Guy B. Wallace – 176151
Mark T. Johnson – 76904
Jennifer U. Bybee – 302212
Travis C. Close – 308673
Rachel L. Steyer – 330064
SCHNEIDER WALLACE COTTRELL KIM LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608-1863
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
Email: gwallace@schneiderwallace.com
mjohnson@schneiderwallace.com
juhrowczik@schneiderwallace.com
tclose@schneiderwallace.com
rsteyer@schneiderwallace.com

Gay Crosthwait Grunfeld – 121944
Jenny S. Yelin – 273601
Benjamin Bien-Kahn – 267933
Adrienne Spiegel – 330482
Maya Campbell – 345180
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com
bbien-kahn@rbgg.com
aspiegel@rbgg.com
mcampbell@rbgg.com

Kathryn A. Stebner – 121088
Brian S. Umpierre – 236399
STEBNER GERTLER & GUADAGNI A Professional Law Corporation
870 Market Street, Suite 1285
San Francisco, California 94102-2918
Telephone: (415) 362-9800
Facsimile: (415) 362-9801
Email: kathryn@sgg-lawfirm.com
brian@sgg-lawfirm.com

David T. Marks – *pro hac vice*
MARKS, BALETTE, GIESSEL & YOUNG, P.L.L.C.
7521 Westview Drive
Houston, Texas 77055
Telephone: (713) 681-3070
Facsimile: (713) 681-2811
Email: davidm@marksfirm.com

Attorneys for Plaintiffs and the Certified Subclasses

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

STACIA STINER; RALPH CARLSON, in his capacity as Trustee of the Beverly E. Carlson and Helen V. Carlson Joint Trust; LORESIA VALLETTE, in her capacity as representative of the Lawrence Quinlan Trust; MICHELE LYTLE, in her capacity as Trustee of the Boris Family Revocable Trust; RALPH SCHMIDT, by and through his Guardian Ad Litem, HEATHER FISHER; PATRICIA LINDSTROM, as successor-in-interest to the Estate of ARTHUR LINDSTROM; BERNIE JESTRABEK-HART; and JEANETTE ALGARME; on their own behalves and on behalf of others similarly situated,

Plaintiffs,

v.

BROOKDALE SENIOR LIVING, INC.; BROOKDALE SENIOR LIVING COMMUNITIES, INC.; and DOES 1 through 100,

Defendants.

Case No. 4:17-cv-03962-HSG (LB)

DECLARATION OF GAY CROSTHWAIT GRUNFELD IN SUPPORT OF PLAINTIFFS' MOTION FOR REASONABLE ATTORNEY'S FEES, COSTS AND EXPENSES

Judge: Hon. Haywood S. Gilliam, Jr.

October 16, 2025
2:00 p.m.
Ctrm. 2, 4th Floor

TABLE OF CONTENTS

Page

I. BACKGROUND AND RELEVANT EXPERIENCE OF RBGG ATTORNEYS 1

II. COURTS REGULARLY APPROVE RBGG'S HOURLY RATES AS REASONABLE 8

III. PLAINTIFFS' COUNSEL'S LODESTAR IS REASONABLE IN LIGHT OF THE COMPLEX AND DIFFICULT CHALLENGES POSED BY THIS CASE 13

IV. RBGG INVESTED THE TIME NECESSARY TO ACHIEVE AN EXCELLENT RESULT FOR THE PLAINTIFFS AND THE CERTIFIED CLASSES 19

A. Plaintiffs' Counsel's Pre-Litigation Investigation 22

B. Litigation of Defendants' Motions to Compel Arbitration, Motions to Dismiss, and Motions to Strike Class Allegations 23

C. Litigating Defendants' Appeal of the January 25, 2019 Order 25

D. Plaintiffs' First Motion for Class Certification 26

E. Plaintiffs Seek Leave to File a Motion for Certification of Subclasses 33

F. Plaintiffs Pursue Supplemental Discovery in Support of the Motion for Certification of Subclasses and for Trial 38

G. The Parties' Cross-Motions for Summary Judgment 41

H. Trial Preparation 43

I. Settlement Negotiations 45

V. TIME SPENT BY PLAINTIFFS' COUNSEL ON THE FEES MOTION WAS NECESSARY AND REASONABLE 46

VI. PLAINTIFFS' COUNSEL'S COSTS AND EXPENSES WERE REASONABLY INCURRED AND NECESSARY TO ACHIEVE RESOLUTION OF THIS CASE 47

I, Gay Crosthwait Grunfeld, declare:

1. I am an attorney duly admitted to practice before this Court. I am the managing partner of the law firm of Rosen Bien Galvan & Grunfeld LLP ("RBGG"), and co-lead counsel of record for Plaintiffs and the Certified Subclasses. I have personal knowledge of the facts set forth herein, and if called as a witness, I could competently so testify. I make this declaration in support of Plaintiffs' Motion for Reasonable Attorney's Fees, Costs and Expenses.

I. BACKGROUND AND RELEVANT EXPERIENCE OF RBGG ATTORNEYS

2. I was appointed class counsel in this case on March 30, 2023, *Stiner v. Brookdale Senior Living, Inc.*, 665 F. Supp. 3d 1150 (N.D. Cal. 2023), and again on July 22, 2024, *Stiner v. Brookdale Senior Living, Inc.*, No. 4:17-cv-03962-HSG (LB), 2024 WL 3498492 (N.D. Cal. July 22, 2024). My firm and I have substantial experience litigating complex class actions, including class actions for injunctive relief under the Americans with Disabilities Act ("ADA") and other disability rights laws. I currently serve as one of the lead counsel in *Armstrong v. Newsom* (N.D. Cal. No. C 94-2307 CW), a class action brought under the due process clause, Title II of the ADA, and Section 504 of the Rehabilitation Act on behalf of persons incarcerated by the California Department of Corrections and Rehabilitation ("CDCR") and persons on California state parole with mobility, hearing, vision, speech, learning, kidney, and developmental disabilities; *Dunsmore v. San Diego County Sheriff's Department* (S.D. Cal. No. 3:20-cv-00406), a class action on behalf of persons incarcerated in the San Diego County Jails, in which we obtained an ADA and state law disability settlement; and *Hendrick v. Grant* (E.D. Cal. No. 2:76-CV-00162-GEB EFB), a class action on behalf of persons incarcerated at the Yuba County Jails, which also includes an ADA claim. I have also been appointed class counsel in a number of other cases, including *Ramirez v. Ghilotti Bros., Inc.* (N.D. Cal. No. 3:12-cv-04590-CRB), a class action on behalf of workers denied pay for all hours worked and for meal and rest breaks; and *L.H. v. Brown* (E.D. Cal. No. CIV S-06-2042 LKK/GGH), a due process and ADA class action on behalf of juveniles on parole in the State of

California.

3. From its formation in 1990, RBGG has been nationally recognized for its civil rights and class action litigation, as well as its prisoner rights, disability rights, employment and consumer class action work. In addition to the cases described above, RBGG is currently lead or co-lead counsel in the following cases involving claims under disability rights statutes in which we obtained consent decrees or court-enforceable settlement agreements: *Cole v. County of Santa Clara*, N.D. Cal. No. 5:16-cv-06594-LHK (class action regarding disability access in the Santa Clara County Jails); *Babu v. County of Alameda*, N.D. Cal. No. 5:18-cv-07677-NC (class action regarding conditions in the Alameda County Jails, including an ADA claim on behalf of class of incarcerated persons with psychiatric disabilities); and *Hernandez v. County of Monterey*, N.D. Cal. No. 5:13-cv-02354-BLF-NMC (class action regarding conditions in the Monterey County Jail, including an ADA claim on behalf of class of incarcerated persons with disabilities).

4. RBGG has litigated a number of other disability rights actions where we have obtained excellent settlement results for our clients, including the following representative cases: *National Federation of the Blind v. Greyhound Lines, Inc.*, N.D. Cal. No. 3:17-cv-03368-RS (class action challenging Greyhound's failure to ensure website and mobile software applications are accessible to blind individuals); *National Federation of the Blind v. Uber Technologies, Inc.*, N.D. Cal. No. 14-cv-04086-NC (class action challenging denials of service and other discrimination against blind and low vision riders with guide dogs who try to use Uber to arrange transportation); *Blanks v. AMC Entertainment, Inc.*, N.D. Cal. No. 4:16-cv-00765-YGR (action on behalf of organizations and blind individuals challenging AMC's failure to provide reliable and accessible audio description services in its movie theaters); *California Council for the Blind v. County of San Mateo*, N.D. Cal. No. 3:15-cv-05784-CRB (action on behalf of organization and blind individuals challenging County's failure to provide accessible absentee voting system for blind and low vision voters); and *Chavez v. County of Los Angeles*, C.D. Cal. No. 2:19-CV-10735-JAK-RAO (action on behalf of deaf individual denied sign language

interpretation during three-day hospitalization during which she underwent surgery to remove one of her organs).

5. Best Lawyers in America placed RBGG in the first tier nationally in Appellate Practice, and in the first tier for San Francisco in Appellate Practice, Commercial Litigation, Employment Law-Individuals, and Civil Rights for 2025, and for many prior years. All of the firm's partners are AV-rated by Martindale Hubbell, and all were recognized as Super Lawyers in 2025 and have been for many years. Senior Counsel Benjamin Bien-Kahn is also recognized as a Super Lawyer and is AV-rated by Martindale Hubbell. Four of the partners, including myself, were named Best Lawyers in America for 2025, and also for many prior years. RBGG attorneys have been honored repeatedly with the *California Lawyer* Attorney of the Year Award, including me in 2012 and 2015, and Mr. Bien-Kahn and former associate Amy Xu in 2022. Seven of the firm's associates, including Brenda Muñoz and Maya Campbell, were named Rising Stars by Super Lawyers in 2025.

6. I graduated from Wellesley College with highest honors and as a member of Phi Beta Kappa in 1981. I graduated from Columbia Law School in 1984 as a Harlan Fiske Stone Scholar and Articles Editor of the *Columbia Law Review*, after which I clerked for the Honorable Jack B. Weinstein of the United States District Court for the Eastern District of New York. My law practice focuses on complex civil litigation, with an emphasis on civil rights, class actions and employment and business litigation. I have spent approximately 20 years litigating and monitoring issues related to enforcement of the ADA, Section 504 of the Rehabilitation Act, and California statutory protections against disability discrimination. As discussed above, I currently serve as one of the lead counsel in *Armstrong*, a class action on behalf of nearly 25,000 California persons with disabilities who are incarcerated or on parole; *Dunsmore*, a class action on behalf of thousands of persons incarcerated in the San Diego County Jails; and *Hedrick*, a class action on behalf of hundreds of persons incarcerated in the Yuba County Jail. I have been approved as class counsel by San Francisco Superior Court Judge Kahn in *Smith v. Shorenstein Hays-*

Nederlander Theatres LLC, San Francisco Cty. Super. Ct. No. CGC-16-554905; by U.S. District Judge Breyer in *Ramirez v. Ghilotti Bros, Inc.,* N.D. Cal. No. 3:12-cv-04590-CRB; by U.S. District Judge Orrick in *Quinby v. ULTA Salon, Cosmetics & Fragrance, Inc.*, N.D. Cal. No. 3:15-cv-04099-WHO; by then-U.S. Magistrate Judge Grewal in *Hernandez v. County of Monterey*, N.D. Cal. No. 5:13-cv-02354-BLF-NMC; by former Alameda County Superior Court Judge Hernandez in *Sunner et al. v. Kenneth R. Turnage II General Contractor, Inc. et al.*, Alameda Cty. Super. Ct. No. RG15772244; and by U.S. District Judge Karlton in *L.H. v. Brown,* E.D. Cal. No. Civ. S-06-2042 LKK/GGH. My work on those cases has established precedent, including under the ADA. In addition, I have served as lead counsel in other litigation resulting in multi-million-dollar settlements. I have over 30 years of experience practicing before trial and appellate courts at both the state and federal levels. A true and correct copy of my resume is attached hereto as **Exhibit A**.

7. **Jenny S. Yelin** is a partner at RBGG. She is a 2010 graduate of the University of California, Berkeley School of Law, where she was an editor on the *California Law Review*, and of Columbia University, from which she graduated *magna cum laude* and as a member of Phi Beta Kappa. Prior to joining RBGG, Ms. Yelin worked for two years at the Santa Clara County Counsel's Office, conducting affirmative litigation on behalf of the County. Ms. Yelin has been an attorney at RBGG since 2012. She became a Senior Counsel in 2020 and a partner in 2022. Ms. Yelin practices complex civil litigation in federal and state courts, with an emphasis on employment cases, class actions, and constitutional and civil rights law. She has worked with numerous clients in the public and private sectors to resolve actual or potential civil litigation concerning employment discrimination and wage and hour violations, and represents middle and high-level executives in their employment contract and severance negotiations. Ms. Yelin also specializes in representing students, faculty members, and staff at higher education institutions in a variety of matters, including Title IX cases, tenure and promotion cases, and disciplinary proceedings. She is experienced in prison conditions of confinement class action cases, having worked for many years on the *Armstrong* class action and then on

Coleman v. Newsom (E.D. Cal. 290-cv-00520-KJM-DB), a class action on behalf of 34,000 individuals incarcerated in California prisons regarding constitutionally-inadequate mental health care and ADA violations. Ms. Yelin is a trained mediator and a member of the U.S. District Court for the Northern District of California's mediation panel. She mediates a variety of civil cases, including ADA and employment matters. She has been selected as a Super Lawyer the past three years and was a Super Lawyers Rising Star every year from 2016 to 2022. She is AV-rated by Martindale Hubbell. A true and correct copy of Ms. Yelin's resume is attached hereto as **Exhibit B**.

8. **Benjamin Bien-Kahn** is a Senior Counsel at RBGG. He is a 2009 graduate of the University of California, Los Angeles School of Law, where he was a member of the Order of the Coif and the recipient of the Judge Jerry Pacht Constitutional Law Award, and of Tufts University, from which he graduated *magna cum laude*. Prior to joining RBGG, he served as a law clerk to the Honorable Rosemary Barkett of the United States Court of Appeals for the Eleventh Circuit. Mr. Bien-Kahn has been an attorney at RBGG since 2012, and became a Senior Counsel in 2019. He practices complex civil litigation in federal and state courts, with an emphasis on class action litigation, constitutional and civil rights law, disability rights, and employment law. For more than decade, Mr. Bien-Kahn has represented the class of California incarcerated people and persons on parole with disabilities in the *Armstrong* case. He has also litigated wrongful death cases on behalf of the families and estates of incarcerated people who died in custody, obtaining significant monetary settlements in *Petrolino v. City and County of San Francisco* (N.D. Cal. No. 16-cv-2946-RS-JCS), *Estate of Medina v. State of Hawaii* (D. Haw. No. CV 12-00340-DKW-RLP), and *Estate of Nunuha v. State of Hawaii* (D. Haw. No. CV 12-00147-DKW-RLP). Mr. Bien-Kahn also represents the not-for-profit publisher Human Rights Defense Center ("HRDC") in First Amendment and due process challenges to censorship by jails and prisons, obtaining consent decrees or settlements in *HRDC v. County of Sonoma* (N.D. Cal. No. 3:25-cv-00361-WHO), *HRDC v. County of Madera* (E.D. Cal. No. 1:23-CV-00332-ADA-HBK), *HRDC v. County of Napa* (N.D. Cal. No. 20-cv-01296-JCS), *HRDC v.*

County of Tehama (E.D. Cal. No. 20-cv-00359-WBS), and *HRDC v. County of Placer* (E.D. Cal. No. 20-cv-00285-JAM). He received the *California Lawyer* Attorney of the Year Award in 2022 as part of the litigation team that obtained an injunction against President Trump's Executive Order 13,943 (August 6, 2020) and its implementing regulations, which would have effectively banned the WeChat social media application. *See U.S. WeChat Users Alliance v. Trump*, 488 F. Supp. 3d 912 (N.D. Cal. 2020). He has been selected as a Super Lawyer the past three years and was a Super Lawyers Rising Star every year from 2014 to 2022. He is AV-rated by Martindale Hubbell. A true and correct copy of Mr. Bien-Kahn's resume is attached hereto as **Exhibit C**.

9. **Christopher Hu** was an associate at RBGG from 2015 to 2018. He is a 2013 graduate of Stanford Law School, where he was president of the *Stanford Law Review*, and of Brown University, from which he graduated *magna cum laude* and as a member of Phi Beta Kappa. Prior to joining RBGG, Mr. Hu served as a law clerk to Justice Goodwin Liu of the Supreme Court of California, and to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. A true and correct copy of Mr. Hu's resume is attached hereto as **Exhibit D**.

10. **Devin Mauney** was an associate at RBGG from 2017 to 2018. He is a 2013 graduate of Harvard Law School, where he was an editor on the *Harvard Law and Policy Review*, and of Barrett Honors College, Arizona State University, from which he graduated *summa cum laude* and as a member of Phi Beta Kappa. Prior to working at RBGG, Mr. Mauney worked as an attorney at the Consumer Financial Protection Bureau. He also served as a law clerk to the Honorable Gladys Kessler of the United States District Court for the District of Columbia, and to the Honorable Thomas Ambro of the United States Court of Appeals for the Third Circuit. A true and correct copy of Mr. Mauney's resume is attached hereto as **Exhibit E**.

11. **Amy Xu** was an associate at RBGG from 2019 to 2024. She is a 2015 graduate of the Washington University School of Law, where she was an editor on the *Washington University Journal of Law and Policy*, and of Washington University, from

which she graduated *magna cum laude*. Prior to working at RBGG, Ms. Xu was an associate at Eversheds Sutherland LLP. She also served as a law clerk for the Honorable Dale A. Drozd of the United States District Court for the Eastern District of California. While at RBGG, Ms. Xu received the *California Lawyer* Attorney of the Year Award in 2022 as part of the litigation team that obtained an injunction against President Trump's Executive Order that would have effectively banned the WeChat social media application. *See U.S. WeChat Users Alliance v. Trump*, 488 F. Supp. 3d 912 (N.D. Cal. 2020). A true and correct copy of Ms. Xu's resume is attached hereto as **Exhibit F**.

12. **Adrienne Spiegel** is an associate at RBGG and a 2019 graduate of Harvard Law School, and of Yale University. Prior to joining RBGG, she was a staff attorney at the East Bay Community Law Center, and a legal fellow with Public Justice. Ms. Spiegel also served as a law clerk to the Honorable Marsha S. Berzon of the United States Court of Appeals for the Ninth Circuit. A true and correct copy of Ms. Spiegel's resume is attached hereto as **Exhibit G**.

13. **Brenda Muñoz** is an associate at RBGG and a 2019 graduate of the University of California, Berkeley School of Law, where she was an editor of the *California Law Review* and the managing editor of the *Berkeley La Raza Law Journal*, and of Stanford University. Prior to working at RBGG, Ms. Muñoz was an associate at Morrison & Foerster LLP. She also served as a law clerk to the Honorable Lisa J. Cisneros of the United States District Court for the Northern District of California. She was named a Super Lawyers Rising Star in 2025. A true and correct copy of Ms. Muñoz's resume is attached hereto as **Exhibit H**.

14. **Maya Campbell** is an associate at RBGG and a 2021 graduate of the University of California, Berkeley School of Law, where she was an editor for the *California Law Review*, and of Reed College. Prior to working at RBGG, Ms. Campbell was an associate at Edelson, P.C., and served as a law clerk to the Honorable Maame Ewusi-Mensah Frimpong of the United States District Court for the Central District of California. She was named a Super Lawyers Rising Star in 2024 and 2025. A true and

correct copy of Ms. Campbell's resume is attached hereto as **Exhibit I**.

15. **Ginger Jackson-Gleich** was an associate at RBGG from 2022 to 2024. She is a 2018 graduate of Harvard Law School, where she was a recipient of the Presidential Public Service Fellowship and worked on the *Harvard Law Review*. She also holds a Master's Degree in Jurisprudence and Social Policy from U.C. Berkeley and a B.A. from University of North Carolina, Chapel Hill, from which she graduated as a member of Phi Beta Kappa. Prior to joining RBGG, Ms. Jackson-Gleich served as a law clerk to two Justices on the Supreme Court of California, and to the Honorable Edward M. Chen of the Northern District of California. A true and correct copy of Ms. Jackson-Gleich's resume is attached hereto as **Exhibit J**.

16. **Ben Hattem** is an associate at RBGG and a 2020 graduate of Stanford Law School, where he was a member of the *Stanford Law Review*, and a teaching assistant to Professor Pamela Karlan and Professor Rabia Belt. Mr. Hattem received his bachelor's degree from Swarthmore College. Mr. Hattem also worked for RBGG as a summer associate. Prior to joining the firm most recently as an associate, he clerked for the Honorable William A. Fletcher of the Ninth Circuit Court of Appeals, the Honorable Goodwin H. Liu of the Supreme Court of California, and the Honorable Myron H. Thompson of the U.S. District Court for the Middle District of Alabama. A true and correct copy of Mr. Hattem's resume is attached hereto as **Exhibit K**.

17. **Karen Stilber**, **Linda Woo** and **F. Gail LaPurja** are senior paralegals at RBGG. **Darcy Edmundson** and **Kedra Chan** are, and **Ellinor Heywood**, **Rebecca Berman**, **Fely Villadelgado**, **Hanna Wallace** and **Luke Weitzenberg** were, paralegals at RBGG. True and correct copies of their resumes are attached hereto as **Exhibit L**. A number of law clerks also contributed to the case, as reflected in our invoice. *See* **Exhibit X**, *infra*.

II. COURTS REGULARLY APPROVE RBGG'S HOURLY RATES AS REASONABLE

18. RBGG's 2025 hourly rates for attorneys and other legal professionals who

worked on this action are wholly consistent with the market rates charged by comparable attorneys and legal staff in the San Francisco Bay Area for work such as that performed in this case. In fact, RBGG's rates are lower than the rates at many San Francisco Bay Area law firms. RBGG's billing practices are similarly comparable to those of other attorneys and legal staff in the San Francisco Bay Area.

19. As the managing partner of the firm, I participate in setting RBGG's rates at least once per year. I also engage in discussions with fee-paying clients about rates. In order to help set rates for my firm, I pay special attention to many sources of information regarding the legal marketplace. The sources upon which I and my partners rely include, but are not limited to: (1) my own and my partners' involvement in attorneys' fees litigation; (2) discussions of attorneys' fees, billing, and work practices with other attorneys; (3) representing other attorneys who seek fees and/or providing expert declarations regarding fees to other attorneys; (4) obtaining declarations from other attorneys regarding market rates, attorneys' fees, billing, and work practices; (5) reviewing surveys, legal newspapers, reported decisions, and treatises regarding prevailing attorneys' rates, fees, billing, and work practices; (6) reviewing attorneys' fees applications and awards in other cases, as well as unpublished decisions; and (7) reviewing rates charged by, and billing and work practices of, other firms that my firm has retained or with whom it has associated.

20. Every year, when my partners and I set rates for the firm, we consider the information we are able to gather regarding other firms' rates, the work we are performing, and the experience of our attorneys and staff, as well as our ongoing communications with our fee-paying clients and potential clients concerning our rates. This is a careful analysis we perform each year by gathering information from numerous law firms and reviewing articles and other public sources of information, such as fee petitions and awards and the information listed above in paragraph 19, to determine the range of prevailing rates in this area for attorneys and paralegals with similar levels of experience performing work of similar complexity. Traditionally, attorneys' billing rates increase each year to reflect the

increased experience level of the attorney, and in accordance with the prevailing market practice. As such, we increase the rates of our attorneys and legal professionals as they gain experience.

21. My 2025 billing rate is $1,325. My partner Jenny Yelin's 2025 billing rate is $925. Senior Counsel Benjamin Bien-Kahn's 2025 rate is $900. Former RBGG associates Christopher Hu and Devin Mauney's 2025 rates are $775. Former RBGG associate Amy Xu's 2025 rate is $700. Former RBGG associate Ginger Jackson-Gleich's 2025 rate is $575. Associates Brenda Muñoz and Adrienne Spiegel's 2025 rates are $550. Associate Benjamin Hattem's 2025 rate is $525. Associate Maya Campbell's 2025 rate is $500. Senior paralegals Karen Stilber and Linda Woo's 2025 rates are $470. Senior paralegal F. Gail LaPurja's 2025 rate is $445. Paralegals Darcy Edmundson and Kedra Chan, and former RBGG paralegals Ellinor Heywood, Rebecca Berman, Fely Villadelgado, Hanna Wallace, and Luke Weitzenberg's 2025 rates are $350.

22. RBGG bills fee-paying clients at my full hourly rates and the full hourly rates for the partners, senior counsel, associates, and paralegals with whom I work, and our firm is paid those rates by our fee-paying clients. They are also the rates we claim in our fee applications in all our fee-shifting cases, both inside and outside the San Francisco Bay Area. These hourly rates contain no contingency, delay or preclusion components. They have been accepted consistently by courts and arbitrators in California, including the following:

a. *Smith v. California Health and Human Services Agency*, N.D. Cal. No. 4:21-cv-07872-HSG (October 21, 2024 Ruling from an Arbitrator on Attorney Fees awarding RBGG's requested 2024 rates, including $1,100 for an RBGG partner (1997 graduate) and $800 for an RBGG senior counsel (2011 graduate). A true and correct copy of the ruling is attached hereto as **Exhibit M**);

b. *United States v. Academy Mortgage Corporation*, No. 3:16-cv-02120-EMC, Dkt. 500 (N.D. Cal. May 31, 2024) (awarding RBGG's requested 2023 hourly rates for its fees work, including $1,475 for an RBGG partner (1962 graduate),

$925 for an RBGG partner (2005 graduate), $875 for an RBGG partner (2008 graduate), $825 for an RBGG senior counsel (2008 graduate), and a senior paralegal rate of $435 for Karen Stilber. A true and correct copy of the ruling is attached hereto as **Exhibit N**);

c. *Prison Legal News v. Ryan*, No. CV-15-02245-PHX-ROS, 2024 WL 1195548, at *2 (D. Ariz. Mar. 20, 2024) (awarding RBGG's requested 2023 rates, including $1,475 for an RBGG partner (1962 graduate), $825 for my partner Jenny Yelin (2010 graduate); $750 for an RBGG senior counsel (2011 graduate), $625 for former RBGG associate Amy Xu (2015 graduate), and paralegal rates ranging from $325 to $435, including $435 for senior paralegal Karen Stilber. A true and correct copy of the Declaration of Sanford Jay Rosen in Support of Plaintiff's Motion for Attorneys' Fees and Expenses describing 2023 rates is attached hereto as **Exhibit O**);

d. *Prison Legal News v. Ryan*, No. 19-17449, 2023 WL 9190364, at *1 (9th Cir. Mar. 21, 2023) (awarding RBGG's requested 2022 rates, including $1,350 for an RBGG partner (1962 graduate), $850 for another RBGG partner (2006 graduate), $575 for former RBGG associate Amy Xu (2015 graduate), and $400 for senior paralegal Karen Stilber);

e. *Andrews v. Equinox Holdings, Inc.*, 570 F. Supp. 3d 803, 806 (N.D. Cal. 2021) (Order approving RBGG's 2021 rates, including $1,250 for an RBGG partner (1962 graduate), $875 for another RBGG partner (1997 graduate), $600 for then-senior counsel Jenny Yelin (2010 graduate), $350 for an RBGG associate (2018 graduate), and paralegal rates ranging from $240 to $275);

f. *Human Rights Defense Center v. County of Napa*, No. 3:20-cv-01296-JCS, 2021 WL 1176640, at *11-12 (N.D. Cal. Mar. 28, 2021) (Order approving RBGG's 2020 rates of $1,100 for a founding partner (1962 graduate), $950 for another partner (1981 graduate), $625 for Senior Counsel Benjamin Bien-Kahn (2009 graduate), and $350 for senior paralegal Linda Woo);

g. *Armstrong v. Brown*, N.D. Cal. No. C94 2307 CW (May 14, 2025 Stipulated Order approving RBGG's fees and costs through periodic fee process, including

my 2025 hourly rate of $1,325, $900 for Senior Counsel Benjamin Bien-Kahn (2009 graduate), $800 for another senior counsel (2011 graduate), $575 for an associate (2017 graduate), $550 for another associate (2018 graduate), $500 for another associate (2020 graduate), and paralegal rates of $335 to $470, including $470 for senior paralegal Karen Stilber. A true and correct copy of the order is attached hereto as **Exhibit P**);

h. *National Federation of the Blind of California, et al. v. Uber Technologies, Inc.*, N.D. Cal. No. 3:14-cv-04086-NC (November 8, 2019 Amended Order awarding RBGG's requested 2019 rates, including hourly rates of $900 for a partner (1980 graduate) and $525 for a senior counsel (2011 graduate). A true and correct copy of the order is attached hereto as **Exhibit Q**);

i. *Hernandez v. County of Monterey*, N.D. Cal. No. 13-cv-02354-BLF (May 1, 2019 Order awarding RBGG's requested 2018 rates. A true and correct copy of the order is attached hereto as **Exhibit R**);

j. *Cole v. County of Santa Clara*, N.D. Cal. No. 16-CV-06594-LHK (March 21, 2019 Order approving RBGG's attorneys' fees based on requested 2018 rates. A true and correct copy of the order is attached hereto as **Exhibit S**);

k. *Sunner et al. v. Kenneth R. Turnage II General Contractor, Inc. et al.*, Alameda Cty. Super. Ct. No. RG15772244 (February 15, 2017 Order approving our request for fees and costs as part of a class action settlement common fund, as well as an excerpt of court filings showing our 2017 billing rates). True and correct copies are attached hereto as **Exhibit T**);

l. *Quinby v. ULTA Salon, Cosmetics & Fragrance, Inc.*, N.D. Cal. No. 3:15-cv-04099-WHO (January 18, 2017 Order approving our request for fees and costs as part of a class action settlement common fund, as well as excerpts of court filings showing our 2016 billing rates. True and correct copies are attached hereto as **Exhibit U**);

m. *National Federation of the Blind of California, et al. v. Uber Technologies, Inc.*, N.D. Cal. No. 3:14-cv-04086-NC (December 6, 2016 Order approving RBGG's 2016 rates, noting that the rates are "reasonable in the San Francisco Bay Area

market[,]" and Declaration of Michael W. Bien in Support of Plaintiffs' Motion for Fees and Costs describing 2016 rates. True and correct copies of the order and declaration are attached hereto as **Exhibit V**);

n. *Hernandez v. County of Monterey*, N.D. Cal. No. 5:13-cv-02354-PSG (November 9, 2015 Order granting attorney's fees and expenses, and Declaration of Michael W. Bien explaining RBGG's requested lodestar based on RBGG's 2015 market rates, including my then-rate of $710 per hour. True and correct copies of the order and declaration are attached hereto as **Exhibit W**);

o. *Armstrong v. Brown*, 805 F. Supp. 2d 918, 922 (N.D. Cal. 2011) (ordering defendants to pay RBGG's "reasonable 2010 hourly rates," including my 2010 rate of $575);

p. *Valdivia v. Brown*, 848 F. Supp. 2d 1141, 1143–44 (E.D. Cal. 2011) (awarding payment of fees at RBGG's 2010 rates of $275 to $800 per hour, given finding that these rates are "are in line with prevailing rates charged by other San Francisco Bay Area attorneys of comparable experience working on similarly complex cases");

q. *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 455 (9th Cir. 2010) (affirming RBGG's requested 2008 rates); and

r. *L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888, 894–95 (E.D. Cal. 2009) (awarding full requested hourly rates of $295 to $640 for RBGG attorneys "based on consideration of the 2008 market rates and the skill of the individual attorneys").

III. PLAINTIFFS' COUNSEL'S LODESTAR IS REASONABLE IN LIGHT OF THE COMPLEX AND DIFFICULT CHALLENGES POSED BY THIS CASE

23. I am familiar with the billing and timekeeping practices of RBGG. Timekeepers at our firm are required to make a record of the work they do at or near the time the work is done, with discrete entries describing each item of work performed and recorded by tenths of an hour, and to either personally enter that information into the firm's timekeeping software or to direct a staff member to do so. The firm's timekeeping software maintains these records in the regular course of RBGG's business, and making

these records is a regular practice of RBGG.

24. We have specific matter numbers to track our efforts in this lawsuit, solely devoted to each phase of this matter, including 1457-01 for merits work and 1457-06 for fees work. Time recorded in each matter was kept contemporaneously.

25. In order to manage the case effectively and efficiently, I allocated responsibilities among different timekeepers to assure coordinated and efficient management of the case, dividing up the labor with particular attention to past experiences and areas of expertise for each attorney and paralegal. I have met regularly with my co-lead counsel Guy Wallace, my co-counsel Brian Umpierre, and with my partner Jenny Yelin to discuss project assignments and supervision of attorneys and paralegals who work on this matter. In staffing this case, consistent with our firm's usual practice, wherever possible, I have delegated assignments to the lowest cost biller assigned to the case.

26. Plaintiffs' litigation team typically met weekly on case strategy and to divide work between RBGG and co-counsel, in order to ensure that all aspects of this complex litigation were handled appropriately and without unnecessary duplication of effort. The attorneys and law firms had specialized roles within the case—for example, each expert witness worked primarily with one attorney on their declarations, Rule 26 reports, and depositions, and each plaintiff worked primarily with one attorney on responding to discovery and preparing for their depositions. RBGG took the lead on, *inter alia*, the briefing of dispositive motions, sealing motion practice for nearly every filing, and responding to Defendants' discovery, whereas our co-counsel took the lead on, *inter alia*, serving discovery on Defendants and follow-up on the same, the briefing of class certification and *Daubert* motions, and expert reports and depositions. But all had to pitch in as matters developed, especially given how aggressively this case was litigated by Defendants.

27. As explained in more detail below, RBGG attorneys spent substantial time working to successfully resolve the claims of the Plaintiffs and of the certified subclasses, and preparing the instant fees petition. At all stages of the litigation, we relied on our

paralegals to assist in marshalling the facts needed to succeed.

28. I am familiar with the skill and experience of all the timekeepers at RBGG who worked on this matter. I believe that my office has performed work on this case efficiently, effectively, with extreme diligence, and without unnecessary duplication. Nevertheless, Ms. Yelin and I reviewed all the relevant times billed by these timekeepers and applied billing judgment reductions where appropriate. In order to have sufficient time to review and prepare time and cost records for this fees petition, RBGG and our co-counsel set a cut-off date of July 15, 2025, as the last date for time and cost entries to include with Plaintiffs' fees petition. If the Court wishes, we can submit additional time records from that date through the final approval hearing.

29. Reviewing the time entries took considerable time and effort, especially given that RBGG's work on this matter dates back to February 2017, more than eight years ago. Ms. Yelin and I vetted each entry line-by-line, consistent with best billing practices and my firm's practice of reviewing and preparing time records for RBGG's fee-paying clients as well as for our contingent fee cases. This review resulted in substantial reduction of claimed time. For example, we have written off all timekeepers who billed five hours or less to a matter, except for time billed by my law partners, who provided invaluable insight, strategic advice and support throughout the past eight years. Ms. Yelin and I made many additional billing judgment reductions in performing our review of RBGG's time, including to account for administrative or unbillable time, inefficiencies, unnecessary duplication of effort, and time that was incorrectly reported to this matter. Where timekeepers recorded different amounts of time for the same meeting, call, or other event, we generally reduced the time to reflect the lowest amount recorded by a timekeeper (exceptions include when a person participated in only a portion of the meeting). We also made numerous discrete billing judgment reductions to work performed by attorneys and paralegals, and cut all travel time by 50%. In addition to these liberal billing judgment reductions, we also applied a 10% across-the-board reduction to further account for any time that might possibly be considered duplicative or excessive, and to account for any

potential issues with Plaintiffs' overall success in the case.

30. Attached hereto as **Exhibit X** is a true and correct copy of the invoice for RBGG's merits work through July 15, 2025. RBGG claims 15,462.9 hours of compensable time on the merits through July 15, 2025, after significant billing judgment reductions that collectively amount to $235,924.50, almost 2% of the value of the total recorded time, before applying the additional 10% across the board reduction. Our merits time, broken down by the principal timekeepers, is as follows:

Timekeeper	Position	Class	Hours	2025 Rate/Hour	Total
Michael Bien	Partner	1980	11.1	$1,675	$18,592.50
Sanford Jay Rosen	Partner	1962	16.6	$1,625	$26,975.00
Gay Grunfeld	Partner	1984	1962.0	$1,325	$2,599,650.00
Ernest Galvan	Partner	1997	4.0	$1,150	$4,600.00
Lisa Ells	Partner	2005	10.4	$1,025	$10,660.00
Jenny Yelin	Partner	2010	2448.4	$925	$2,264,770.00
Ben Bien-Kahn	Senior Counsel	2009	2827.1	$900	$2,544,390.00
Christopher Hu	Associate	2013	375.2	$775	$290,780.00
Devin Mauney	Associate	2013	444.8	$775	$344,720.00
Amy Xu	Associate	2015	2035.8	$700	$1,425,060.00
Ginger Jackson-Gleich	Associate	2018	16.0	$575	$9,200.00
Brenda Muñoz	Associate	2019	411.7	$550	$226,435.00
Adrienne Spiegel	Associate	2019	1020.0	$550	$561,000.00
Benjamin Hattem	Associate	2020	65.5	$525	$34,387.50
Maya Campbell	Associate	2021	327.1	$500	$163,550.00
Karen Stilber	Senior Paralegal		2139.6	$470	$1,005,612.00
Linda Woo	Senior Paralegal		89.3	$470	$41,971.00

Timekeeper	Position	Class	Hours	2025 Rate/Hour	Total
F. Gail LaPurja	Senior Paralegal		12.9	$445	$5,740.50
Grace Brew	Law Clerk		24.6	$425	$10,455.00
Alexandra Daniels	Law Clerk		16.0	$425	$6,800.00
Ines Diaz	Law Clerk		27.8	$425	$11,815.00
Nya Hardaway	Law Clerk		31.2	$425	$13,260.00
Jessica Santillo	Law Clerk		5.7	$425	$2,422.50
Rebecca Berman	Paralegal		61.3	$350	$21,455.00
Kedra Chan	Paralegal		7.1	$350	$2,485.00
Darcy Edmunson	Paralegal		372.4	$350	$130,340.00
Ellinor Heywood	Paralegal		612.1	$350	$214,235.00
Fely Villadelgado	Paralegal		19.4	$350	$6,790.00
Hanna Wallace	Paralegal		10.8	$350	$3,780.00
Luke Weitzenberg	Paralegal		56.9	$350	$19,915.00
Total			**15,462.8**		**$12,021,846.00**

31. The below table reflects RBGG's billing judgment reductions for its merits time, plus the additional 10% across-the-board reduction, amounting to an additional $1,202,184.60 reduction:

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

Reductions to RBGG Merits Work (through July 15, 2025)		
Category	**Hours**	**Amount**
Time Records		
Time Entries: Claimed	15,792.6	$12,021.846.00
Time Entries: Billing Judgments	329.7	$235,924.50
Total (Claimed Entries + Billing Judgment Entries)	15,462.9	$12,257,770.50
10% Across-the-Board Reduction		$1,202,184.60
Total Reduction		$1,438,109.10
% Reduction		11.73%
RBGG Merits Work Lodestar	**15,792.6**	**$10,819,661.40**

Our total merits lodestar through July 15, 2025, after billing judgments, is $10,819,661.40.

32. Due to RBGG's extensive work on this litigation over the past eight years, our firm has been precluded from taking on many other matters, including both full-rate fee-paying and contingent fee work relating to jail/prison investigations and litigation, disability rights law, business and employment cases, and legal malpractice matters. I have turned down multiple employment law and other intakes each month in the past eight years because I could not devote the time necessary to these potential clients due to the heavy workload in this case.

33. RBGG began working on this matter more than eight years ago, in February 2017. Despite spending substantial time on this case, RBGG has not received any payment for work performed in this matter. Nevertheless, RBGG has had to pay the salary and benefits of the lawyers, paralegals and support staff who have worked on this matter, as well as expert costs, deposition costs, travel expenses, and overhead required to support our employees' work (including but not limited to rent, office supplies, computer support, and legal research and telephone charges).

34. A summary of the key work performed by RBGG from case inception through July 15, 2025 is set forth below.

/ / /

IV. RBGG INVESTED THE TIME NECESSARY TO ACHIEVE AN EXCELLENT RESULT FOR THE PLAINTIFFS AND THE CERTIFIED CLASSES

35. We began investigating this matter in February 2017. RBGG and our co-counsel at Schneider Wallace Cottrell Kim LLP ("Schneider Wallace") and Stebner Gertler & Guadagni ("SGG") filed the original complaint on July 13, 2017, on behalf of current and former residents of California Residential Care Facilities for the Elderly ("RCFEs") owned, leased and/or operated by Defendants Brookdale Senior Living, Inc. and Brookdale Senior Living Communities, Inc. ("Defendants" or "Brookdale"), asserting class and individual claims under Title III of the ADA, the Unruh Civil Rights Act ("Unruh Act"), the Consumer Legal Remedies Act ("CLRA"), California's Elder Financial Abuse Statute, and California's Unfair Competition Law ("UCL"). *See* ECF No. 1.

36. The case raised groundbreaking, novel and difficult issues regarding the civil rights of elderly persons and persons with mobility and vision disabilities, and has been vigorously litigated by both sides from the start. The parties engaged in extensive motion practice, conducted 61 days of depositions (including approximately nine days of Rule 30(b)(6) depositions covering eight topics), retained and produced reports and declarations from 14 expert witnesses, and exchanged more than 3.3 million pages of documents in discovery. Plaintiffs' two accessibility experts conducted day-long disability access inspections of 52 of Brookdale's California RCFEs in 2019 and 2020, and then re-inspected the six facilities where the named Plaintiffs live or lived in 2024. They issued comprehensive reports detailing thousands of access barriers at Brookdale's California RCFEs that violate federal and/or state disability access requirements.

37. Defendants litigated this case aggressively at every turn. From October 2021 on, there were at least two law firms representing Brookdale—Seyfarth Shaw LLP and Moore & Lee, P.C. As we prepared for trial, two new firms joined Brookdale's defense team—Quintairos, Prieto, Wood & Boyer, P.A., and Baird Holm LLP—for a total of four. Defendants had scores of lawyers working on the case, and at one point had 130 lawyers working behind the scenes on document review. *See* Mar. 18, 2021 Discovery Hearing

Transcript, ECF No. 224, at 21:13-19 ("We had to have 130 attorneys review the documents. We've spent 22,000 hours."). Defendants filed numerous unnecessary motions—including several meritless motions to strike, *see, e.g.*, ECF Nos. 656, 911; a motion to deny class certification, filed less than four months before the stipulated deadline for Plaintiffs to file their class certification motion, ECF No. 232; and a motion to decertify the Rule 23(b)(2) access barrier subclasses, filed less than three weeks after these subclasses were certified, ECF No. 834. They also filed three motions for sanctions against Plaintiffs, ECF Nos. 657, 686, 797, all of which were denied, ECF Nos. 733, 820, 825. In over thirty years of practice, I have never had a sanctions motion filed against me, other than by the Defendants in this case.

38. Defendants' practice of designating nearly every document that they produced in this action as "confidential" also created hundreds of hours of additional work, requiring us to prepare motions to consider whether documents that Defendants designated as "confidential" which we submitted in support of or opposition to motions should be filed under seal, as required by N.D. Cal. Civil Local Rule 79-5(f). Defendants would typically not even attempt to justify sealing many of the documents and information that they had designated "confidential." We would then have to do additional work re-filing the relevant pleadings with only a smaller subset of documents or portions thereof redacted or filed under seal. On four occasions, the Court ordered the parties to file a single administrative motion to seal consolidating all pending sealing motions, in order to address the high volume of such motions due to Defendants' over-designation of documents and information as "confidential" that could not justifiably be filed under seal. *See* July 22, 2022 Joint Administrative Sealing Motion, ECF No. 550; Sept. 7, 2023 Omnibus Sealing Motion, ECF No. 641; Jan. 3, 2024 Omnibus Sealing Motion, ECF No. 701; Nov. 12, 2024 Omnibus Sealing Motion, ECF No. 925.

39. Plaintiffs achieved substantial success in this hard-fought case. We believe this is the first case in which a Court has held that assisted living facilities are places of public accommodations subject to Title III of the ADA where the issue was contested. We

also believe the class action settlement agreement is the first time owners or operators of assisted living facilities have stipulated to an injunction whereby they are required to renovate assisted living facilities to bring them into compliance with federal accessibility requirements, and to provide an accessible room to any resident who requests one without requiring them to pay for the remediation or modification(s). Further, in the class action settlement agreement, Defendants have agreed to renovate all three assisted living facilities to comply with the 2010 Americans with Disabilities Act Accessibility Standards, including Brookdale San Ramon and Brookdale Scotts Valley, which were constructed before the effective date of the ADA. The class action settlement also includes requirements at the two RCFEs where named plaintiffs still live regarding staffing levels and what representations may be made to current or prospective residents, as well as improved emergency evacuation plans to accommodate residents with disabilities, which could save lives. *See* Jenna Russell, *Speculation Swirls After Deadly Fire at Massachusetts Assisted Living Facility*, THE NEW YORK TIMES (July 15, 2025), https://www.nytimes.com/2025/07/15/us/fire-gabriel-house-fall-river-massachusetts.html?smid=nytcore-ios-share&referringSource=articleShare ("[Q]uestioning lingered on Tuesday about the devastating fire that killed nine residents of an assisted living facility and injured many more over the weekend…. [O]ne former employee who worked there for more than a year said she never saw the staff perform fire drills or practice emergency evacuations, despite a population that included many older patients with mobility limitations who used walkers, wheelchairs or scooters to get around."). Additionally, the eight named plaintiffs obtained relief on all of their individual claims as part of the confidential settlement agreement with Brookdale.

40. The case received significant press coverage, including an investigative piece published by the Washington Post on April 1, 2024, about Brookdale's staffing practices nationwide, *Algorithms Guide Senior Home Staffing. Managers Say Care is Suffering*, which included examples drawn from this case, https://tinyurl.com/assisted-living-staffing, an NBC Bay Area broadcast on November 11, 2021, which included an interview with

Plaintiff and class representative Michele Lytle, the daughter of Plaintiff Edward Boris, https://www.nbcbayarea.com/investigations/nations-largest-senior-living-operator-accused-of-neglect-and-abuse/2729639/?amp, a segment on KQED Radio's California Report on April 17, 2019, which quoted me regarding the lawsuit's challenge to the access barriers at Brookdale's assisted living facilities, https://www.kqed.org/news/11740682/apple-and-qualcomm-reach-a-settlement-over-chip-lawsuit, and an East Bay Times article published on April 14, 2019, *East Bay Seniors, Disabled Residents Sue Nation's Largest Assisted Living Provider*, https://www.eastbaytimes.com/2019/04/14/seniors-disabled-residents-sue-nations-largest-assisted-living-provider/. The press coverage not only shows the importance of this action, but was critical to help us to connect with putative class members. One difficulty in the case was that it was hard to find residents who were willing and able to serve as class representatives in an action challenging the conditions of the assisted living facility where they live and the adequacy of the caregiver staff on whom they rely on a daily basis.

A. Plaintiffs' Counsel's Pre-Litigation Investigation

41. RBGG began work on this matter on February 3, 2017, after being contacted by prospective clients who resided at one of Brookdale's California RCFEs. From that date through the commencement of this action on July 13, 2017, my firm met with numerous witnesses and prospective clients, and conducted a thorough investigation into the potential disability rights law and consumer fraud and related legal claims of residents of Brookdale's California RCFEs. This included conducting legal research into potential claims and defenses; interviewing prospective clients and witnesses; analyzing Brookdale residency agreements, marketing materials and other publicly available documents; gathering and analyzing evidence from prospective clients and witnesses (including letters, e-mails, and family and resident council meeting minutes); and obtaining and analyzing public records from the California Department of Social Services ("DSS"), the agency responsible for regulating RCFEs, and through Public Records Act requests to other public entities with relevant records.

42. During the pre-litigation period, RBGG also met with prospective co-counsel, and entered into a co-counseling agreement with the law firms now known as Schneider Wallace Cottrell Kim LLP and Stebner Gertler & Guadagni, who were also investigating disability law and consumer fraud legal claims on behalf of residents of Brookdale's California RCFEs. We worked with co-counsel to prepare a demand letter to Brookdale and to draft the original Complaint, filed on July 13, 2017 on behalf of four named plaintiffs and/or their Guardians Ad Litem.

43. RBGG identified another plaintiff and putative class representative, the legal representative of Plaintiff Lawrence Quinlan, who we added as a named plaintiff in the First Amended Complaint, filed on August 25, 2017. ECF No. 20.

44. From the outset and throughout the litigation, co-counsel worked to efficiently coordinate our work between firms and to avoid duplications of effort. This declaration focuses on the reasonableness and necessity of the work performed by my law firm to advance the Plaintiffs' claims.

B. Litigation of Defendants' Motions to Compel Arbitration, Motions to Dismiss, and Motions to Strike Class Allegations

45. From July 2017 through January 2019, the parties briefed two rounds of motions to compel arbitration of certain Plaintiffs' claims, two motions to dismiss the operative complaints, and two motions to strike class allegations from the complaints. *See Stiner v. Brookdale Senior Living, Inc.*, 354 F. Supp. 3d 1046, 1051 (N.D. Cal. 2019), *aff'd in part, rev'd in part and remanded*, 810 F. App'x 531 (9th Cir. 2020) ("*Stiner I*"); ECF Nos. 23 (first motion to compel), 59 (second motion to compel), 24 (first motion to dismiss), 60 (second motion to dismiss), 25 (first motion to strike), 61 (second motion to strike). During the litigation of these motions, discovery was not yet open. Discovery commenced on March 14, 2019, after the Court resolved the motions and referred the case to Magistrate Judge Laurel Beeler for discovery matters. ECF No. 117; *see also* ECF Nos. 105, 106, 109. (The Court denied Plaintiffs' earlier April 2018 administrative motion to open discovery. ECF Nos. 57, 63.)

46. On September 28, 2017, Defendants filed their first motion to compel arbitration, motion to dismiss, and motion to strike allegations. ECF Nos. 23-25. RBGG was the primary drafter of Plaintiffs' Opposition to the Motion to Compel Arbitration, ECF No. 31, and approximately half of the arguments in opposition to Defendants' Motion to Dismiss, ECF No. 33, both filed on November 9, 2017.

47. While these motions were pending, my law firm identified four additional plaintiffs and putative class representatives, each of whom had opted out of arbitration—Plaintiff Bernie Jestrabek-Hart, and the legal representatives for Plaintiffs Edward Boris, Arthur Lindstrom, and Ralph Schmidt. We drafted Plaintiffs' Motion for Leave to Amend the First Amended Complaint, filed on February 15, 2018, seeking to remove three plaintiffs who were subject to arbitration clauses, and adding four new plaintiffs who had opted out of arbitration, among other changes. ECF No. 38. Defendants opposed the motion, and RBGG also drafted the Reply brief, filed on March 8, 2018. ECF No. 46. The Court granted leave to file the Second Amended Complaint for good cause and terminated Defendants' pending motions without prejudice to renewal following the filing of the Second Amended Complaint. ECF No. 47. Plaintiffs' Second Amended Complaint was filed on March 29, 2018. ECF No. 52.

48. On April 20, 2018, Defendants filed their renewed motion to compel arbitration, and their second motions to dismiss and to strike allegations in the operative complaint. ECF Nos. 59-61. RBGG was again the primary drafter of Plaintiffs' Opposition to Defendants' Renewed Motion to Compel Arbitration, ECF No. 69, and approximately half the arguments in opposition to Defendants' Motion to Dismiss, including arguments that Defendants had not previously raised, ECF No. 70, all of which were filed on May 17, 2018. My co-lead counsel Guy Wallace and I argued the motions together at the hearing on July 12, 2018. ECF No. 78. On January 25, 2019, the Court denied Defendants' motions to compel and to strike in full, and denied in major part Defendants' motion to dismiss. *Stiner I*, 354 F. Supp. 3d at 1063. The Court found that the ADA applies to assisted living facilities, the first case to ever so hold based on

contested argument, and the first of several orders where the Court so found. *Id.* at 1058-59.

49. Prior to the Court's January 25, 2019 Order, RBGG identified another plaintiff and putative class representative, Plaintiff Jeanette Algarme. On February 15, 2019, we filed the Third Amended Complaint, adding Ms. Algarme as a plaintiff, among other changes. ECF No. 90.

C. Litigating Defendants' Appeal of the January 25, 2019 Order

50. On February 25, 2019, Defendants appealed the part of the Court's Order denying their motion to compel Plaintiffs Helen Carlson and Lawrence Quinlan to arbitrate their claims and sought to stay the case and obtain permission to appeal the part of the Order regarding the applicability of the ADA to assisted living facilities. ECF Nos. 93, 94, 98, 99. RBGG was the primary drafter of Plaintiffs' Opposition to Defendants' Motion to Stay Ms. Carlson's and Mr. Quinlan's claims, which was filed on March 11, 2019. ECF No. 111. On June 5, 2019, the Court denied Defendants' motions to stay and for certification of an interlocutory appeal. *Stiner v. Brookdale Senior Living, Inc.*, 383 F. Supp. 3d 949 (N.D. Cal. 2019) ("*Stiner II*").

51. RBGG took the lead role in litigating Defendants' appeal of the Court's January 25, 2019 Order. On July 5, 2018, Defendants filed their Opening Appellate Brief and a motion to stay litigation of Ms. Carlson's and Mr. Quinlan's claims in the Ninth Circuit Court of Appeals. We drafted the Opposition to the Motion to Stay, filed on July 15, 2019, and the Plaintiffs-Appellees' Answering Brief, filed on October 3, 2019. *See* Case No. 19-15334, ECF No. 16-1, 23. On October 31, 2019, the Court of Appeals denied Defendants' Motion to Stay. *Id.*, ECF No. 29. While RBGG was preparing for oral argument in the midst of the Covid-19 pandemic, the Ninth Circuit issued an order stating no oral argument would occur. On April 24, 2020, the Ninth Circuit affirmed the majority of this Court's denial of Defendants' motion to compel arbitration, finding that Ms. Carlson was not bound to arbitrate any of her claims, and that Mr. Quinlan could litigate his ADA and Unruh Act claims, but was required to arbitrate his claims under the

CLRA, UCL, and Elder Financial Abuse Statute. *Stiner v. Brookdale Senior Living, Inc.*, 810 F. App'x 531 (9th Cir. 2020).

D. Plaintiffs' First Motion for Class Certification

52. Plaintiffs pursued significant discovery in advance of the filing of their first motion for class certification once discovery opened on March 14, 2019. ECF No. 117. Brookdale vigorously opposed discovery, making it necessary for the parties to expend substantial time meeting and conferring on discovery disputes, and forcing Plaintiffs to litigate disputes over the production of such critical and discoverable documents as Brookdale's residency agreements, ESI based on key word searches and custodians, and Brookdale's policies related to disability access law compliance. *See, e.g.*, ECF Nos. 135, 173, 187, 189, 210. From July 10, 2019, through August 2, 2021, the parties filed 17 discovery letter briefs—most of which were granted in full or in major part for Plaintiffs—as well as several requests for discovery conferences with Magistrate Judge Beeler. These included motions drafted by RBGG seeking production of resident complaints made during the proposed class period about caregiver staffing, disability access, and other problems alleged by Plaintiffs, and to permit inspection of the memory care sections of Defendants' California RCFEs, ECF Nos. 144, 162, each of which was granted by the Court, ECF Nos. 147, 166. Many more discovery disputes were resolved without the Court's assistance, through time-consuming negotiations that resulted in compromises between the parties. Almost all of this discovery was relevant to the merits of the plaintiffs' individual claims, regardless of the outcome of Plaintiffs' class certification motion.

53. Prior to the filing of the first class certification motion, Plaintiffs also conducted 16 depositions, including eight days of Rule 30(b)(6) depositions covering seven topics. RBGG took five of those depositions: the depositions of three Executive Directors of Brookdale RCFEs where Plaintiffs live or lived, and two Rule 30(b)(6) depositions. Ms. Yelin and I also participated in five day-long inspections of Brookdale's California RCFEs conducted by Plaintiffs' accessibility experts in 2019 and 2020.

Inspections ultimately had to be curtailed due to the Covid-19 shutdown orders and the need to keep elderly residents in assisted living as safe as possible.

54. RBGG also took the lead in responding to the discovery Defendants propounded on the named plaintiffs, including by drafting responses to Defendants' Interrogatories and Requests for Production of Documents and preparing the document productions for six of the eight named plaintiffs—Jeanette Algarme, Edward Boris, Helen Carlson, Bernie Jestrabek-Hart, Arthur Lindstrom, and Lawrence Quinlan—and by defending the depositions of those six Plaintiffs or their legal representatives. RBGG also prepared a Motion for Substitution of Deceased Plaintiffs, filed on May 17, 2021, to ensure that the successors-in-interest for each Plaintiff who had passed away during the litigation were substituted in as plaintiffs, which was granted on June 2, 2021. ECF Nos. 254, 260.

55. Prior to the filing of Plaintiffs' first motion for class certification, RBGG and our co-counsel spent a significant amount of time analyzing documents produced in discovery by Brookdale and by subpoenaed third parties, as well as publicly available documents and records produced in response to our Public Records Act requests. This included extensive work by RBGG analyzing both pendant call button response time data produced by Defendants, and DSS records of more than 800 deficiency citations issued against Brookdale's California RCFEs during the proposed class period, which provided evidence of Defendants' understaffing and the resulting harms to residents. RBGG also oversaw an investigation by private investigators into potential witnesses who might testify on behalf of the putative classes. RBGG attorneys and paralegals conducted many interviews of putative class members and other witnesses identified from the putative class lists produced by Brookdale in discovery, and worked with those witnesses on declarations submitted in support of the class certification motion.

56. Preparation for the class certification motion was made more difficult by Defendants' last-minute high volume production of documents only eleven weeks before the May 20, 2021 deadline to file the class certification motion, which forced Plaintiffs to file a contested motion to postpone the deadline to move for class certification. *See* ECF

No. 221. Although Defendants had represented to the Court that their document production would be complete by the end of 2020, they produced more than 229,000 documents compromising over 1.2 million pages in January and February 2021, 46% of all the documents and 42% of the total pages Defendants had produced in this case up to that point. ECF No. 221 at 3-4. Even this tardy production was heavily backloaded, with 158,000 pages produced in January 2021, followed by over one million pages in February 2021. *Id.* at 4.

57. On April 30, 2021, while the parties were in the midst of taking depositions and completing discovery in preparation for Plaintiffs' impending motion for class certification, Defendants filed a Motion to Deny Class Certification, supported by eight attorney and witness declarations. ECF No. 238. On May 3, 2021, the Court summarily denied Defendants' motion, noting that "the briefing schedule noticed by Defendants is inconsistent with Dkt. No. [232], the schedule stipulated to by the parties and set by the Court on April 12, 2021, and unfair to the Plaintiffs as it purports to require an opposition within two weeks." ECF No. 250. The Court further found "that this is not the type of unusual case in which a preemptive motion to deny certification is appropriate, efficient or helpful," especially given that "Plaintiffs are currently conducting discovery relating to class certification," and "given Defendants' effort to preemptively foreclose hypothetical amendments to the complaint never sought by Plaintiff, and their suggestion that they may later oppose certification on 'additional grounds.'" *Id.*

58. On August 18, 2021, Plaintiffs filed a motion for class certification, seeking to certify three classes of current and former residents of Brookdale's California RCFEs to pursue claims for declaratory and injunctive relief and damages under the ADA, Unruh Act, CLRA, UCL, and Elder Financial Abuse Statute. *See* ECF No. 276-5. The motion was supported by seven expert declarations—including declarations from Plaintiffs' two accessibility experts, which attached the access reports they prepared for each of the 52 inspections they conducted of Brookdale's California RCFEs in 2019 and 2020—as well as six attorney declarations, declarations from each of the eight named plaintiffs (or their

legal representatives), and 82 declarations from additional putative class members and fact witnesses.

59. RBGG was responsible for identifying the evidence supporting class certification sponsored by the Declaration of Guy Wallace. ECF No. 276-7. We also prepared the Declaration of Benjamin Bien-Kahn and its 571 exhibits, including Facility Evaluation Reports and Complaint Investigation Reports containing 807 deficiency citations issued by DSS against Brookdale's California RCFEs during the proposed class period, and a 97-page index summarizing the relevant citations for the Court. ECF No. 279. I also prepared an attorney declaration regarding RBGG's and my qualifications to be appointed as class counsel. ECF No. 288. My law firm worked with six of the eight named Plaintiffs on their class certification declarations, and we also prepared many other declarations by putative class members and fact witnesses that were filed in support of class certification. RBGG also did significant work helping Plaintiffs' accessibility experts to prepare for filing the access reports documenting the thousands of access barriers they identified during their inspections. My firm also drafted the sealing motion and supporting papers. In light of Brookdale's designation of almost every document they produced in discovery as confidential, extensive work was necessary to redact the materials to file conditionally under seal, ensure that there was nothing potentially confidential included in the publicly-filed pleadings, and coordinating with our co-counsel to finalize and file the class certification motion and supporting papers. ECF No. 276.

60. Our extensive work on the class certification motion was made more difficult by the fact that our office was shut down due to the Covid-19 pandemic from March 17, 2020 until June 2021. Even after that date, we were required to wear masks in the office until 2023. All of our depositions were taken by Zoom until 2024. Our staff worked tirelessly to coordinate our work as seamlessly as possible, notwithstanding the technological challenges and the inability to meet together to review and revise documents and discuss strategy. At various times during the preparation of the motion for class certification, our clients and staff became ill with Covid and had to be further isolated and

unable to participate in the litigation.

61. Once Plaintiffs' Motion for Class Certification was filed, the parties continued to engage in substantial expert and fact discovery and motion practice. Defendants deposed all seven experts who submitted declarations in support of class certification, and filed six motions to exclude the opinions of the seven experts—all of which were denied by the Court. ECF Nos. 346-348, 350, 353, 355. Plaintiffs deposed the three defense experts who submitted declarations opposing class certification, and filed two motions to exclude portions of the testimony and opinions of Defendants' three experts. ECF Nos. 510, 511. Plaintiffs also filed a motion to strike a supplemental expert declaration submitted by Defendants on May 6, 2022, more than two months after their deadline to do so, and only weeks before the deadline for Plaintiffs' Reply. ECF Nos. 503, 504. My firm drafted the Reply Brief in support of the Motion to Strike the additional expert declaration. ECF No. 528. From the filing of the class certification motion on August 18, 2021, through the filing of Plaintiffs' Reply on May 19, 2022, the parties also filed 12 discovery letter briefs to Magistrate Judge Beeler regarding discovery necessary to litigate the motion, the majority of which were resolved in Plaintiffs' favor.

62. RBGG took the lead on Plaintiffs' efforts to depose a subset of the 224 Brookdale residents or legal representatives who submitted declarations opposing class certification ("resident-declarants"), in order to impeach their testimony on Reply. Brookdale opposed these depositions. My firm drafted and argued an informal discovery motion seeking to take no more than 16 depositions of the 224 resident-declarants, lasting no more than four hours each. ECF No. 461. On April 1, 2022, Magistrate Judge Beeler granted the motion in full and required the depositions to "be scheduled and concluded by May 1." ECF No. 463.

63. For the next month, RBGG managed a complex process of identifying and serving resident-declarants with deposition subpoenas and attempting to schedule the depositions, under enormous time pressure during a pandemic with many offices still closed. This included coordinating with process servers to complete service,

communicating with the subpoenaed witnesses and their families to arrange the depositions, and working with court reporter services to reserve court reporters and locations for the depositions across the state of California. Although the Court "direct[ed] Brookdale to cooperate in scheduling the depositions to minimize the burden on the deponents," ECF No. 463, Defendants did not represent any of the resident-declarants, would not accept service on their behalf, were not otherwise able to help with scheduling the depositions, and declined to allow the depositions to occur at Brookdale facilities where declarants—may of whom had disabilities—lived.

64. From April 1 through April 18, 2022, RBGG issued deposition subpoenas to 37 of Brookdale's resident-declarants. We had to cancel 31 of the 37 depositions after learning from witnesses that they were unable or unwilling to testify and/or wished to withdraw the declarations, because process servers were unable to complete service, or because Brookdale had obtained declarations from them even though they lacked the capacity to testify, without the knowledge or consent of their legal representatives and/or family members. Two witnesses did not appear at their depositions. Plaintiffs ultimately took four depositions of Brookdale residents between April 11 and April 29, 2022. ECF No. 506-7, ¶¶ 2-48.

65. On May 19, 2022, Plaintiffs filed their Reply in support of class certification. ECF No. 505-3. We believed it was necessary to submit substantial supporting evidence in reply in order to respond to Defendants' voluminous and wide-ranging opposition—including a 40-page brief, hundreds of witness declarations from residents and company officials, three expert declarations, and multiple attorney declarations, comprising approximately 12,653 pages, *see* ECF No. 529 at 5—which relied heavily on the new argument that Brookdale did not own or operate its California RCFEs. Plaintiffs' Reply brief was thus supported by nine expert declarations, three attorney declarations, 65 declarations from putative class members and fact witnesses, and a request for judicial notice.

66. RBGG was responsible for identifying the evidence submitted in reply to

rebut Defendants' new argument that they did not own or operate their California RCFEs, sponsored by the Reply Declaration of Guy Wallace, and for preparing Mr. Wallace's declaration and its 187 exhibits to refute Brookdale's new position, which the Court ultimately rejected. ECF Nos. 505-4, 505-5, 505-6, 505-7. We also prepared the Reply Declaration of Benjamin Bien-Kahn and its 74 exhibits, summarizing Plaintiffs' efforts to take the depositions of a subset of Brookdale's resident-declarants, as described in paragraphs 62-64, above, ECF No. 508-4, ¶¶ 2-48, laying the foundation for the analysis conducted by RBGG of the resident declarations submitted in opposition to class certification, which revealed numerous indicia of unreliability, *id.*, ¶¶ 49-56, and providing evidence of 33 additional deficiency citations issued by DSS against Brookdale's California RCFEs since the filing of Plaintiffs' class certification motion, *id.*, ¶¶ 57-92. RBGG also prepared additional declarations by putative class members and fact witnesses, drafted the request for judicial notice and the complex sealing motion and supporting papers, and worked on the redactions of materials filed conditionally under seal. ECF Nos. 507, 508.

67. After Plaintiffs' Reply was filed, Defendants filed several motions related to the class certification motion, including an Objection to Reply Evidence, ECF No. 518, an "Emergency Administrative Motion for Status Conference," ECF No. 513, a motion seeking to continue the class certification hearing to allow for additional discovery and/or briefing by Defendants, ECF No. 520, an opposition to Plaintiffs' Request for Judicial Notice seeking to strike allegedly improper argument, ECF No. 524 at 2 n.1, and a motion to strike allegedly improper reply attorney declarations, ECF No. 525. RBGG drafted the reply in support of the request for judicial notice, filed on June 9, 2022, and the opposition to the motion to strike attorney declarations, filed on June 16, 2022. ECF Nos. 536, 543. The class certification motion, eight *Daubert* motions, and all other pending motions were heard on July 8, 2022.

68. After the class certification hearing, the Court ordered the parties to file a single administrative motion to seal that consolidated all motions to seal that remained

pending relating to documents submitted in support of or in opposition to the class certification motion. ECF No. 549. On July 25, 2022, the parties filed the Joint Combined Administrative Motion to Seal. ECF No. 550. RBGG took the lead in drafting Plaintiffs' portions of the joint motion.

69. On March 30, 2023, the Court granted in part and denied in part Plaintiffs' class certification motion, certifying a Rule 23(b)(2) subclass regarding the legality of the Fleet Safety Policy, Brookdale's wheelchair and scooter user transportation policy (the "FSP Subclass"). *See Stiner v. Brookdale Senior Living, Inc.*, 665 F. Supp. 3d 1150 (N.D. Cal. 2023) ("*Stiner III*").

70. From the class certification hearing on July 8, 2022, through March 10, 2023, discovery remained open, but Defendants refused to respond to requests for supplemental discovery going to the merits of Plaintiffs' claims. On September 30, 2022, Defendants filed a Motion to Stay Discovery Pending the Court's Class Certification Ruling. ECF No. 569. RBGG drafted the opposition to the motion to stay, filed on October 14, 2022. ECF No. 571. On March 10, 2023, the Court granted the motion to stay discovery. ECF No. 590.

E. Plaintiffs Seek Leave to File a Motion for Certification of Subclasses

71. After the Court's March 30, 2023 Order, Plaintiffs requested that the Court provide notice to members of the certified FSP Subclass, and to notify former putative members of the other proposed classes that the statute of limitations on their individual claims were no longer tolled. Plaintiffs also sought permission from the Ninth Circuit to appeal the order pursuant to Fed. R. Civ. Proc. 23(f), *see* ECF No. 600-1, supported by amicus briefs from prominent disability-rights nonprofit organizations, but the Ninth Circuit declined to allow the appeal. *Stiner v. Brookdale Senior Living, Inc.*, No. 23-80030, ECF No. 13 (9th Cir. May 31, 2023). The Court paused the litigation while Plaintiffs' Rule 23(f) petition was pending, other than briefing on Plaintiffs' requests regarding class notice. RBGG drafted the reply in support of the motion for class notice, filed on June 6, 2023. ECF No. 616. We also drafted Plaintiffs' portion of the Omnibus

Motion to Seal documents submitted in support of and in opposition to the class notice motion. ECF No. 641.

72. After Plaintiffs filed a motion to terminate the litigation pause, ECF No. 628, the Court held a case management conference ("CMC") on August 24, 2023. At the CMC, the Court granted Plaintiffs' motion to terminate the pause in litigation, reopening discovery, and denied the motion regarding notice to the certified FSP Subclass and to former putative class members. ECF No. 636. On August 31, 2023, at the Court's direction, the parties jointly filed a proposed pretrial schedule and trial date, including a deadline for Plaintiffs to file motion for leave to file a Fourth Amended Complaint, and a motion for leave to file a renewed motion for class certification. ECF No. 640. On October 13, 2023, Plaintiffs filed a Fourth Amended Complaint. ECF No. 647.

73. On October 19, 2023, Plaintiffs filed a Motion for Leave to File a Motion for Certification of Subclasses, seeking leave to propose eight subclasses for certification: six subclasses regarding their claims for violations of the disability access requirements of the ADA and the Unruh Act under Rule 23(b)(2) and 23(b)(3), limited to the six current or former Brookdale RCFEs where the named plaintiffs reside or resided; and two subclasses regarding their consumer fraud claims under the CLRA, UCL and Elder Financial Abuse Statute, limited only to residents who paid Community Fees to Brookdale at the time they moved into its facilities. *See* ECF No. 650. The motion for leave included the argument and evidence in support of certification of the subclasses on the merits, and to the extent possible, Plaintiffs relied upon and adapted their pleadings and research prepared for their original motion for class certification. The motion for leave was supported by eight expert declarations, three attorney declarations, declarations from the eight named plaintiffs (and/or their legal representatives) and from two additional proposed putative class representatives, and 100 declarations from putative subclass members and fact witnesses.

74. For the Motion for Leave, RBGG drafted an updated Declaration of Guy Wallace to include the evidence supporting certification of the proposed subclasses, an updated Declaration of Benjamin Bien-Kahn to introduce evidence of all 839 relevant

deficiency citations issued by DSS against Brookdale's California RCFEs during the proposed class period, and prepared new class certification declarations for six of the eight named plaintiffs (or their legal representatives).

75. On October 23, 2023, Defendants filed a Motion to Strike portions of Plaintiffs' Motion for Leave and a Motion for Sanctions (based on the assertion that it was improper for Plaintiffs to seek leave for certification of two subclasses related to their consumer fraud claims), and an Administrative Motion to shorten the briefing schedule for the Motion to Strike. ECF Nos. 656-658. RBGG drafted the opposition to the motion for sanctions, filed on November 6, 2023. ECF No. 670. The motions were denied in full on February 7, 2024. ECF No. 733.

76. Plaintiffs filed their Reply in Support of their Motion for Leave on November 20, 2023, along with three attorney declarations, one expert declaration, and a supplemental declaration from Plaintiff and putative class representative Jeanette Algarme. RBGG was responsible for drafting the sections of the Reply brief regarding the Elder Financial Abuse statute and on Ms. Algarme's standing to seek injunctive relief on behalf of the proposed Brookhurst access barrier subclass, preparing my declaration regarding a scrivener's error in the operative complaint, and preparing the declaration of Ms. Algarme regarding her intent to return to Brookdale's Brookhurst facility. We also drafted the sealing motion and prepared the redactions for materials filed conditionally under seal. My firm also drafted Plaintiffs' portion of the Omnibus Motion to Seal documents submitted in support of and in opposition the Motion for Leave. ECF No. 701.

77. On December 5, 2023, Defendants filed a Motion to Strike allegedly improper attorney reply declarations, and another Motion for Sanctions. ECF Nos. 681, 682. On December 8, 2023, Defendants filed a second, mostly duplicative, Motion to Strike the amended attorney declaration of my co-counsel Brian Umpierre. ECF No. 683. RBGG drafted the opposition to the motion for sanctions regarding the allegedly improper attorney declarations. ECF No. 686. The Court denied both Defendants' motions to strike and the motion for sanctions on February 7, 2024. ECF No. 733. Although the Court did

find that the attorney declarations contained some improper argument, the Court also "admonishe[d]" Defendants for "filing multiple motions pertaining to and containing virtually identical material," "causing Plaintiffs to spend twice as long briefing materially identical issues, and the Court to spend twice as long sorting through the parties' briefing on the motions to strike," thereby "bogging down the Court with serial and ancillary motions to strike and motions for sanctions." ECF No. 733 at 6 n.5.

78. On February 1, 2024, the Court heard argument regarding Plaintiffs' motion for leave to file a motion for certification of subclasses. On February 7, 2024, the Court granted the motion in part, granting Plaintiffs leave to file a motion for certification of the six access barrier facility-based subclasses on their ADA and Unruh Act claims. ECF No. 733. Plaintiffs filed the motion for certification of subclasses two days later, seeking certification under Rule 23(b)(3) of subclasses for damages under the Unruh Act for physical access barriers at all six facilities, and certification under Rule 23(b)(2) of subclasses for declaratory and injunctive relief at the three facilities—Brookhurst, Scotts Valley and San Ramon—where named plaintiffs had standing to pursue this relief. ECF No. 740.

79. Defendants requested and were granted more than three months to prepare their opposition to Plaintiffs' motion for certification of subclasses, based on their representation to the Court that their accessibility expert would need to conduct inspections of the six current and former Brookdale RCFEs for Defendants in order to oppose the motion. Defendants filed the opposition to the motion for certification of subclasses on May 13, 2024. ECF No. 783. Notwithstanding Defendants' representation, there were no declarations or reports regarding any inspections by Defendants' accessibility expert accompanying the Opposition.

80. Plaintiffs filed their Reply in Support of the Motion for Certification of Subclasses on June 4, 2024. ECF No. 805. RBGG drafted the Reply Declaration of Guy Wallace, sponsoring evidence obtained since the filing the motion for certification of subclasses, and the declaration of Plaintiff and putative class representative Bernie

Jestrabek-Hart, correcting information submitted by Defendants' accessibility expert in opposition to class certification. We also drafted certain sections of the reply brief, and the sealing motion and supporting pleadings.

81. The hearing on the motion for certification of subclasses was held on June 27, 2024. ECF No. 814. On July 22, 2024, the Court granted in part Plaintiffs' motion, certifying the three Rule 23(b)(2) facility-specific access barrier subclasses. *Stiner v. Brookdale Senior Living, Inc.*, No. 4:17-cv-03962-HSG (LB), 2024 WL 3498492 (N.D. Cal. July 22, 2024) ("*Stiner IV*").

82. On August 8, 2024, Defendants filed a motion to decertify the Rule 23(b)(2) access barrier subclasses seeking injunctive and declaratory relief, less than three weeks after these subclasses were certified. ECF No. 834. Plaintiffs opposed the motion on September 3, 2024. ECF No. 853. On November 15, 2024, the Court denied Defendants' motion. ECF No. 930. In the Order, the Court noted that Defendants "outright misrepresent the holding" of a case they relied upon, and admonished that "the Court has zero tolerance for such misrepresentations of case holdings. It should go without saying, but apparently the Court must say it: the parties are directed in the strongest terms *never to shade, overstate or misrepresent the holding of any case*. Any future instances of such lack of candor, by either party, will be a basis for sanctions. Enough." ECF No. 930 at 1, n.2.

83. Although the Court did not certify the six Rule 23(b)(3) facility-specific access barrier subclasses in its July 22, 2024 Order, the Court noted that, "given the divergence of authorities within the circuit and the significance of the answer for people with disabilities, the Court is of the view that further clarification regarding the relationship between standing and Rule 23(b) predominance in Unruh Act cases would benefit the courts and litigants," and as such, "the Court would consider a request from the parties to certify this question to the Ninth Circuit." *Stiner IV*, 2024 WL 3498492, at *12, n.15. Accordingly, on August 15, 2024, Plaintiffs filed a motion to certify an order for an interlocutory appeal on the issue of whether the Court applied the correct legal standard

regarding standing, eligibility for statutory damages, and Fed. R. Civ. Proc. 23(b) predominance in Unruh Act cases involving disability access claims. ECF No. 841. The Court heard Plaintiffs' motion on September 19, 2024. On March 18, 2025, the Court terminated the motion as moot. ECF No. 1027.

F. Plaintiffs Pursue Supplemental Discovery in Support of the Motion for Certification of Subclasses and for Trial

84. Once the Court lifted the litigation pause on August 25, 2023, Plaintiffs promptly pursued supplemental discovery in support of their motion for certification of subclasses, and to obtain the evidence needed for trial. All of the discovery sought during this time period was important to the merits of the plaintiffs' individual claims and/or to the claims of the certified subclasses. Defendants once again vigorously opposed discovery. It was again necessary for the parties to spend a substantial amount of time meeting and conferring over discovery disputes. The parties had to litigate disputes over critical information and documents, such as to permit Plaintiffs' accessibility experts to re-inspect the six Brookdale RCFEs where named Plaintiffs live or lived, and to require Brookdale to supplement its document production as required by Rule 26(e), including by producing relevant ESI created more recently than early 2021. *See*, *e.g.*, ECF Nos. 705, 714, 760.

85. From December 2023 through the close of fact discovery on August 1, 2024, the parties filed 13 discovery letter briefs, two noticed motions to compel discovery, and two motions for reconsideration of discovery orders—the majority of which were resolved in favor of Plaintiffs. RBGG drafted one of the noticed motions to compel and 6 discovery letter briefs, successfully seeking, *inter alia*, production of the class list for the certified FSP Subclass, responses to Plaintiffs' interrogatories regarding the factual bases for the affirmative defenses pled by Defendants and for their position on the existence of access barriers identified by Plaintiffs' experts that the named plaintiffs encountered, and permission to take additional fact witness depositions. *See* ECF Nos. 691, 704, 712, 716, 717, 753, 754, 755. Many more discovery disputes were resolved without the Court's

assistance, but only after time-consuming negotiations and the exchange of draft informal discovery letter briefs. For example, Defendants only agreed to produce the class lists for the three certified Rule 23(b)(2) access barrier subclasses after the parties had exchanged portions of a draft discovery letter brief, after having refused to produce the identities of the class members to class counsel throughout the meet and confer process.

86. Our efforts to obtain the class list for the certified FSP Subclass is an example of the difficulties Plaintiffs faced in obtaining discovery during this period. Defendants refused to produce anything in response to Plaintiffs' document request seeking the class list and would consider no compromises in the meet and confer process. At Magistrate Judge Beeler's direction, we ultimately briefed and filed three motions to compel on this single discovery dispute between December 21, 2023, and March 8, 2024—two discovery letter briefs and one noticed motion. ECF Nos. 691, 695, 700, 704, 716, 748, 755. On April 25, 2024, Magistrate Judge Beeler resolved the discovery dispute in our favor, ordering Defendants to produce the class list. ECF No. 778. Defendants then filed a motion for relief from the April 25 Order, ECF No. 779, which this Court denied on May 2, 2024, ECF No. 781. During a May 6, 2024, meet and confer, Defendants stated for the first time that, notwithstanding the plain text of the March 30, 2023 Order defining the FSP Subclass to include former residents going back to July 2014, *see Stiner III*, 665 F. Supp. 3d at 1195-96, they would only produce the class list for current residents of Brookdale's California RCFEs. Defendants refused to bring this new discovery dispute to Magistrate Judge Beeler, and instead filed a motion with this Court seeking clarification of the March 30, 2023 Order. ECF No. 782. RBGG drafted Plaintiffs' response to the motion for clarification, arguing that the March 30, 2023 Order defines the FSP Subclass to include, *inter alia*, former residents, which was confirmed by the Court in its July 22, 2024 Order. *See* ECF No. 794; *Stiner IV*, 2024 WL 3498492 at *13-14. It was only at that point that Brookdale began a rolling production of the names and contact information for the members of a class that had been certified nearly 16 months earlier.

87. In March and April 2024, Plaintiffs also conducted 10 depositions of fact

witnesses and defended the deposition of the legal representative of one plaintiff. RBGG took 7 of those depositions: the depositions of one former Executive Director and three current or former Health and Wellness Directors of Brookdale's San Ramon and Scotts Valley RCFEs (where two named plaintiffs live), and three depositions of resident-declarants who submitted declarations in opposition to class certification. Plaintiffs' accessibility experts also re-inspected the six facilities where the named Plaintiffs reside(d). RBGG attorneys participated in three of these day-long inspections. RBGG also prepared and served supplemental document productions and interrogatory responses for six of the eight named plaintiffs, pursuant to our duty to supplement under Rule 26(e).

88. On May 1 and May 15, 2024, Plaintiffs disclosed Rule 26 expert reports for ten experts. RBGG worked with Dr. Alex Barchuk, Plaintiffs' medical expert on wheelchair transfers, on his Rule 26 expert report. In September and October 2024, Plaintiffs took the depositions of three of Defendants' experts and defended the depositions of seven of Plaintiffs' experts. RBGG defended the deposition of Dr. Barchuk. On September 26, 2024, Plaintiffs filed a motion to exclude certain testimony of one of Defendants' experts, and Defendants filed a motion to exclude certain testimony of five of Plaintiffs' experts. ECF Nos. 881, 882. RBGG drafted the portions of the opposition to Defendants' *Daubert* motion challenging certain opinions of Dr. Barchuk, which was filed on October 10, 2024. ECF No. 904.

89. On May 31, 2024, Defendants filed another motion for sanctions, seeking to disqualify my co-counsel Mark Johnson and to exclude Plaintiffs' expert on emergency evacuations based on a dispute over whether Plaintiffs were permitted to invite their counsel and expert to visit their resident rooms and the common areas of the facilities where they lived without first serving a formal inspection request. ECF No. 797. Plaintiffs opposed the motion for sanctions on June 14, 2024. ECF No. 811. RBGG worked with Plaintiff Bernie Jestrabek-Hart on her supporting declaration, and helped with the drafting of the opposition to the sanctions motion, which the Court denied without hearing. *See* August 2, 2024 Minute Entry, ECF No. 825.

G. The Parties' Cross-Motions for Summary Judgment

90. On September 5, 2024, the parties filed cross motions for summary judgment. Plaintiffs filed a motion for partial summary judgment, seeking final determination of seven key issues in order to streamline the case for trial, including that Brookdale owns and/or operates its California RCFEs, that Brookdale's assisted living facilities are covered by Title III of the ADA, and the existence of 146 physical access barriers in the common areas of five Brookdale RCFEs that apply to persons with mobility disabilities, in violation of the applicable federal and/or state accessibility standards. ECF No. 856 at 10-11. Brookdale filed a motion seeking summary judgment on all of Plaintiffs' claims (other than Plaintiffs' staffing-related claims, which had been stayed and bifurcated for a separate trial by the Court). ECF No. 861. RBGG took the lead role in briefing the cross-motions for summary judgment for Plaintiffs.

91. Plaintiffs' Motion for Partial Summary Judgment was supported by three expert declarations and an attorney declaration. RBGG drafted the memorandum of points and authorities and proposed order, identified the evidence necessary to support the motion, and prepared the Declaration of Benjamin Bien-Kahn and its 70 exhibits. We also prepared the sealing motion.

92. Plaintiffs filed their opposition to Defendants' Motion for Summary Judgment on September 26, 2024. ECF No. 884. RBGG drafted most of the memorandum of points and authorities in opposition to summary judgment, identified the evidence necessary to oppose the motion, and prepared the Declaration of Benjamin Bien-Kahn and its 53 exhibits. We also worked with Plaintiffs' two accessibility experts to prepare their declarations opposing summary judgment and the supporting exhibits, and prepared the sealing motion..

93. On October 10, 2024, Plaintiffs filed their Reply in support of their motion for partial summary judgment. ECF No. 902. RBGG drafted most of the reply brief and the Reply Declaration of Benjamin Bien-Kahn. RBGG also drafted Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment, filed

on October 17, 2024, ECF No. 908, and the opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence, filed on November 1, 2024, ECF No. 922. We also drafted Plaintiffs' portion of the Omnibus Motion to Seal documents submitted in support of and in opposition to the parties' cross-motions for summary judgment. ECF No. 925.

94. On December 13, 2024, the Court granted in part Brookdale's motion for summary judgment, dismissing the Plaintiffs' and the certified subclasses' Unruh Act claims for alleged violations of the California Building Code, and denying summary judgment for Defendants as to all other claims. ECF No. 978. Although the Court denied in part Plaintiffs' motion for partial summary judgment, the Court made a number of findings that narrowed the remaining issues for trial in Plaintiffs' favor. In the Order, the Court reaffirmed that Brookdale's California RCFEs are places of public accommodation under Title III of the ADA, found that successor owners and operators like Brookdale may be found liable for disability discrimination when their newly constructed facilities do not adhere to the applicable federal accessibility standards, rejected Defendants' arguments that the FSP subclass claims are moot, and found that Defendants could not establish a direct threat affirmative defense to the FSP subclass's claims as a matter of law.

95. In the December 13, 2024 Order, the Court also found that there was no factual or legal basis for denying plaintiffs' motion for partial summary judgment with respect to the existence of 146 physical access barriers included in the motion, but deferred on granting the partial summary judgment based on the Court's inability to determine from Plaintiffs' papers the substance and form of the relief sought. ECF No. 978 at 12. Plaintiffs clarified at the pretrial conference that they sought judgment on those barriers based on the fact that there is no dispute as to their existence and that they violate the applicable federal accessibility standards. At the Court's direction, we submitted a Revised [Proposed] Order Entering Partial Summary Judgment on the subset of barriers at issue that indisputably violate federal accessibility standards. ECF No. 984. In their response, Defendants did not dispute that each barrier at issue exists and violates the ADA,

but argued that partial summary judgment should be denied because there remained a material factual dispute as to Ms. Algarme's standing to represent the Brookhurst Subclass. ECF No. 985. On December 26, 2024, the Court denied Plaintiffs' Motion for Summary Judgment as to the Brookhurst Subclass's access barrier claims, based on the dispute over Ms. Algarme's standing, and deferred ruling on the motion with respect to the individual access barrier claims for damages brought by plaintiffs who resided at Brookdale's Hemet and Fountaingrove facilities, which would not be tried until after the first trial on the certified subclasses' claims. ECF No. 988. Plaintiffs' motion for partial summary judgment thus successfully streamlined these issues for trial.

96. On January 17, 2025, the Court entered an Order clarifying that it had also granted summary judgment against Defendants on both Defendants' argument that application of the ADA to its assisted living facilities would result in a violation of Defendants' right to due process, and that the injunctive relief claims of the FSP Subclass were mooted by a recent litigation-motivated change to Defendants' transportation policies, thereby further narrowing the issues for trial in favor of Plaintiffs. ECF No. 1017.

H. Trial Preparation

97. The first trial of three trials—on the injunctive relief claims of the four certified subclasses—was set to begin on January 27, 2025, with jury selection to commence on January 24, 2025. ECF Nos. 789, 927. In accordance with deadlines set by the Court's civil standing order, the parties diligently prepared two rounds of pretrial filings: an initial set filed in late November and early December 2024, and a second revised set filed after the Court's issuance of the December 13, 2024 summary judgment order in early January 2025. *See* ECF Nos. 939-976; 995-1002. Both sets of pre-trial pleadings occurred around major holidays when our office was closed, creating logistical hurdles. Both sets were also joint, requiring many hours of meet and confer and lasting late into several nights.

98. With substantial assistance from our co-counsel, my firm took the lead on drafting the Joint Pretrial Statement, ECF No. 965, and in preparing Plaintiffs' exhibits list

and the list of evidence that might be introduced at trial obtained from deposition testimony, interrogatory responses, or responses to requests for admission; Plaintiffs' objections to Defendants' exhibits and discovery designations; and Plaintiffs' responses to Defendants' objections to our exhibits and discovery designations. *See* ECF No. 965-2. RBGG drafted two of Plaintiffs' five motions *in limine*, ECF Nos. 941, 945, and the opposition to one of Defendants' three motions *in limine*, ECF No. 955. RBGG was also the primary drafter of the Joint Proposed Neutral Statement of the Case, ECF No. 957, Plaintiffs' Trial Brief, ECF No. 964, and the Joint Supplemental Statement in Response to Order ECF No. 950, requiring the parties to identify "relevant, comparable cases involving similar claims and those cases' total trial times," ECF No. 976. With Schneider Wallace taking the lead, we also did substantial work to prepare the joint proposed jury instructions, the witness list, and the demonstratives for trial. ECF No. 972.

99. After the December 17, 2024 pretrial conference, RBGG and our co-counsel worked on updating and amending the pretrial filings that were re-filed in advance of the second pretrial conference on January 14, 2025. During the period between pretrial conferences, Defendants also filed a motion for a bench trial as to the claims of the Brookhurst Subclass, and a motion to reopen discovery to obtain Plaintiff Algarme's medical records. ECF Nos. 989, 990. RBGG drafted Plaintiffs' oppositions to both motions. ECF Nos. 993, 994. Class counsel also prepared for and conducted a mock trial to prepare for the first of the three trials.

100. To rebut Defendants' argument that Ms. Algarme lacked standing to represent the Brookhurst Subclass, on January 9, 2025, I traveled with her to Brookdale's Brookhurst facility while a videographer filmed her, to show that she was willing and able to return if Brookdale were to remove the physical access barriers. I immediately shared the video with Defendants' counsel, because I considered this evidence to have eliminated Brookdale's standing defense. Based on Brookdale's pre-trial filings, they did not contest any of the ADA barriers identified by Plaintiffs' experts. Having rebutted Defendants' standing defense, liability under the ADA seemed highly likely.

I. Settlement Negotiations

101. In October 2019 and September 2021, the parties participated in two mediation sessions with Judge Edward A. Infante (Ret.) through JAMS, neither of which was successful. We incurred mediation fees and expended time preparing the mediation briefs and attending the unsuccessful mediations.

102. Beginning on October 15, 2024, as ordered by the Court, the parties participated in four Mandatory Settlement Conference sessions with Magistrate Judge Joseph C. Spero. Judge Spero facilitated additional settlement communications outside of the scheduled mediation sessions, and the parties also worked directly through several meet and confers to reach a final agreement in principle, culminating in a confidential term sheet entered on February 6, 2025. On March 16, 2025, the parties reached a final Class Action Settlement Agreement and a Confidential Individual Settlement resolving the individual claims of the eight named plaintiffs.

103. On March 17, 2025, Plaintiffs filed an unopposed motion for preliminary approval of the class action settlement for injunctive relief, resolving the claims of the four subclasses. ECF No. 1026. On May 1, 2025, the Court held a hearing on the motion, and ordered the parties to file a supplemental brief on why the proposed class action settlement does not impermissibly confer preferential treatment on certain named class members; and a description of the parties' proposed process for providing class notice of the settlement. ECF No. 1035. Plaintiffs filed an unopposed supplemental statement in support of the motion for preliminary approval on May 22, 2025, and the parties' joint proposed class notice plan on May 29, 2025. ECF Nos. 1043, 1044. On June 13, 2025, the Court entered an Order granting preliminary approval of the class settlement for injunctive relief, ECF No. 1047. The parties then stipulated to a schedule for the events necessary for final approval of the class action settlement, ECF No. 1049, including notice to the subclasses, which was issued on July 10, 2025. Throughout this period, we remained in close touch with the class representatives and named plaintiffs. We conducted Zoom meetings, sent emails, and drafted letters to ensure that they were fully informed of our trial preparation

and settlement efforts, and they had a sufficient basis to determine whether to agree to the class action and individual settlements.

V. TIME SPENT BY PLAINTIFFS' COUNSEL ON THE FEES MOTION WAS NECESSARY AND REASONABLE

104. I have substantial experience litigating fees motions in federal and state courts. I have drafted declarations and briefs in support of Plaintiffs' attorneys' fees motions in the *Gober v. Ralphs Grocery Co.*, 137 Cal. App. 4th 204 (2006), *L.H. v. Schwarzenegger*, 848 F. Supp. 2d 1141 (E.D. Cal. 2011), *Armstrong v. Brown*, 805 F. Supp. 2d 918 (N.D. Cal. 2011), and *Dunsmore v. San Diego*, No. 3:20-cv-00406-AJB-DDL (S.D. Cal.) cases. I also regularly review Plaintiffs counsel's time and costs as part of a periodic fees process established in the *Armstrong* and *Hedrick* cases. In that capacity, I frequently reduce time that I believe is excessive or duplicative. I also carefully review Plaintiffs' bills and remove costs that were incurred inappropriately or should be billed to a different matter.

105. Reviewing RBGG's fees work required a similarly careful line-by-line vetting of many hundreds of RBGG time entries recorded in the 1457-06 matter. As with the merits time, Ms. Yelin and I made many billing judgment reductions to account for administrative time, inefficiencies, unnecessary duplication of effort, and time that was incorrectly reported to this matter. We also made numerous discrete billing judgment reductions to work performed by attorneys and paralegals, and also applied a 10% across-the-board reduction to further account for any time that might possibly be considered duplicative or excessive.

106. Attached hereto as **Exhibit Y** is a true and correct copy of the invoice for RBGG's fees work through July 15, 2025. After the time reductions described above, RBGG is claiming for 261.9 hours of our time working on the fees petition through that date. After substantial billing judgment reductions and an additional 10% across-the-board discount, collectively amounting to nearly 15% of the value of its total recorded time (or $32,826.55), RBGG seeks a fees lodestar of $189,508.95 for their work through July 15,

2025. The below table reflects RBGG's billing judgment reductions for its fees time:

Reductions to RBGG Fees Work (through July 15, 2025)		
Category	**Hours**	**Amount**
Time Records		
Time Entries: Claimed	261.9	$210,565.50
Time Entries: Billing Judgments	13.9	$11,770.00
Total (Claimed Entries + Billing Judgment Entries)	275.8	$222,335.50
10% Across-the-Board Reduction	$21,056.55	
Total Reduction		$32,826.55
% Reduction		14.76%
RBGG Fees Work Lodestar	**261.9**	**$189,508.95**

107. In my opinion, the time spent on the fees motion and supporting declarations was necessary and appropriate given the complexity and scope of the project.

VI. PLAINTIFFS' COUNSEL'S COSTS AND EXPENSES WERE REASONABLY INCURRED AND NECESSARY TO ACHIEVE RESOLUTION OF THIS CASE

108. Pursuant to our co-counseling arrangement with Schneider Wallace, many of the costs incurred in this action were split between the two law firms. Other costs and expenses were paid directly. Attached hereto as **Exhibit Z** is a summary listing of the expenses and costs RBGG paid to pursue Plaintiffs' claims, beginning in 2017, as well as the receipts supporting the expenses and costs. RBGG seeks a total of $1,116,924.97 in costs and expenses through July 15, 2025.

109. Plaintiffs relied heavily on their two disability access experts, Jeffrey Scott Mastin and Gary Waters, in order to prevail on the claims of the three facility-specific subclasses. The ADA and the California Building Code both contain specific accessibility standards, about which Mr. Mastin and Mr. Waters possess vast expertise. Without their expertise, Plaintiffs could not have identified and obtained Defendants' agreement to remediate hundreds of access barriers at Brookdale's Brookhurst, San Ramon and Scotts Valley facilities. Mr. Mastin's and Mr. Waters' most time-consuming tasks pertained to

conducting 58 day-long inspections of Brookdale's California RCFEs for compliance with state and federal accessibility standards, and drafting reports documenting the findings of those inspections. Mr. Mastin's and Mr. Waters' inspections involved taking detailed measurements of hundreds of elements required to be compliant with state and federal accessibility standards. After the inspections, Mr. Mastin and Mr. Waters prepared detailed site inspection reports for each RCFE that identified every barrier found with a citation to the governing standard(s) and, typically, photograph(s) of the barrier. These reports have been provided to Brookdale and can be used in the future to remediate barriers at facilities beyond those where the named Plaintiffs reside or resided. Mr. Mastin and Mr. Waters also each prepared several declarations in support of Plaintiffs' motions for class certification and declarations in opposition to Defendants' motion for summary judgment, as well as Rule 26 expert reports, and sat for two depositions each. RBGG incurred $426,422.71 in expert fees for the work performed by Mr. Mastin and Mr. Waters.

110. Plaintiffs also reasonably incurred the costs associated with the work performed by their other experts, in order to achieve successful resolution of the case for the certified subclasses and the plaintiffs' individual claims. Plaintiffs relied on their transportation access expert, Douglas Cross, and their medical expert on wheelchair transfers, Dr. Alex Barchuk, to prevail on the claims of the FSP Subclass. Plaintiffs also reasonably incurred expert fees relating to their emergency evacuation and understaffing claims, and the calculation of the damages for the putative classes and individual plaintiffs, which contributed to the parties' settlement discussions and the actual settlement agreement and stipulated injunction. RBGG incurred $326,753.89 in expert fees for the work performed by Plaintiffs' other experts (not including Mr. Mastin and Mr. Waters).

111. Most of the other costs incurred by RBGG are routine litigation expenses. These include court reporter and travel costs associated with taking depositions, transcripts, travel expenses in connection with client meetings, depositions, and site inspections, costs for service of process and service of subpoenas, mediation fees,

consultant fees for the mock trial, jury consultation, and preparation of trial demonstratives, and the costs for legal research, and copying, printing and mailing costs. I have carefully reviewed the costs incurred by RBGG both as I paid them and for this fee petition. All of the costs claimed by Plaintiffs were necessarily incurred in the prosecution of Plaintiffs' successful claims on behalf of the certified classes and individual plaintiffs. Plaintiffs' counsel have advanced all fees and costs in this litigation.

112. RBGG seeks a total of $1,116,924.97 in costs and expenses incurred from May 17, 2017 to present, as broken down by category of costs and expenses in this chart:

RBGG Costs/Expenses	
Copying/Printing	$18,352.20
Court Reporter Fees	$842.74
Depositions	$82,555.22
Document Hosting/Management	$55,914.47
Expert/Consultant Fees	$872,847.54
Investigation Services	$13,524.25
Legal and Fact Research	$39,732.96
Mediation Fees	$4,700.00
Postage/Delivery	$2,128.22
Miscellaneous	$1,646.22
Service of Process/Subpoenas	$11,025.71
Travel Expenses	$13,425.19
Long Distance Telephone	$230.25
Total Expenses	**$1,116,924.97**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at San Francisco, California this 6th day of August 2025.

Gay Crosthwait Grunfeld

TABLE OF CONTENTS

EXHIBITS TO DECLARATION OF GAY CROSTHWAIT GRUNFELD IN SUPPORT OF PLAINTIFFS' MOTION FOR REASONABLE ATTORNEY'S FEES, COSTS AND EXPENSES

DESCRIPTION	EXHIBIT NO.
Gay Crosthwait Grunfeld Resume	A
Jenny S. Yelin Resume	B
Benjamin Bien-Kahn Resume	C
Christopher Hu Resume	D
Devin Mauney Resume	E
Amy Xu Resume	F
Adrienne Spiegel Resume	G
Brenda Muñoz Resume	H
Maya Campbell Resume	I
Ginger Jackson-Gleich Resume	J
Ben Hattem Resume	K
Karen Stilber, Linda Woo, F. Gail LaPurja, Darcy Edmundson, Kedra Chan, Ellinor Heywood, Rebecca Berman, Fely Villadelgado, Hanna Wallace, and Luke Weitzenberg Resumes	L
Smith v. California Health and Human Services Agency, N.D. Cal. No. 4:21-cv-07872-HSG (October 21, 2024)	M
United States v. Academy Mortgage Corporation, No. 3:16-cv-02120-EMC, Dkt. 500 (N.D. Cal. May 31, 2024)	N
Declaration of Sanford Jay Rosen in Support of Motion for Attorneys' Fees, decided in *Prison Legal News v. Ryan*, No. CV-15-02245-PHX-ROS, 2024 WL 1195548 (D. Ariz. Mar. 20, 2024)	O
Armstrong v. Brown, N.D. Cal. No. C94 2307 CW (May 14, 2025)	P
National Federation of the Blind of California, et al. v. Uber Technologies, Inc., N.D. Cal. No. 3:14-cv-04086-NC (November 8, 2019)	Q

DESCRIPTION	EXHIBIT NO.
Hernandez v. County of Monterey, N.D. Cal. No. 13-cv-02354-BLF (May 1, 2019)	R
Cole v. County of Santa Clara, N.D. Cal. No. 16-CV-06594-LHK (March 21, 2019)	S
Sunner et al. v. Kenneth R. Turnage II General Contractor, Inc. et al., Alameda Cty. Super. Ct. No. RG15772244 (February 15, 2017)	T
Quinby v. ULTA Salon, Cosmetics & Fragrance, Inc., N.D. Cal. No. 3:15-cv-04099-WHO (January 18, 2017)	U
National Federation of the Blind of California, et al. v. Uber Technologies, Inc., N.D. Cal. No. 3:14-cv-04086-NC (December 6, 2016)	V
Hernandez v. County of Monterey, N.D. Cal. No. 5:13-cv-02354-PSG (November 9, 2015)	W
RBGG's Invoice for RBGG's Merits Work Through July 15, 2025	X
RBGG's Invoice for Fees Work Through July 15, 2025	Y
Summary Listing of RBGG's Expenses and Costs and Supporting Receipts	Z

EXHIBIT A

ROSEN BIEN GALVAN & GRUNFELD LLP

Gay Crosthwait Grunfeld
(formerly Danforth)

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: ggrunfeld@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP; San Francisco, California
Managing Partner **2018 – Present**
Partner **2008 – 2017**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Rosen Bien & Galvan, LLP; San Francisco, California **2005 – 2007**
Associate Attorney

Bryant, Clohan & Baruh, LLP; Palo Alto, California **2001 – 2005**
Associate Attorney

General and complex civil litigation, including jury trial experience, in real estate, business, insurance "bad faith," construction defect, and employment claims and disputes.

Fenwick & West; Palo Alto, California **1996 – 1997**
Associate Attorney

Represented high-tech companies in employment, commercial, and trade secret disputes, and provided employment counseling and advice.

State of California, Administrative Office of the Courts **1993 – 1995**
San Francisco, California
Consultant & Editor

California Judicial Council report, Achieving Equal Justice for Women and Men in the Courts.

Dickson & Ross; Oakland, California **1989 – 1991**
Associate Attorney

Employment and environmental litigation in court and in administrative proceedings.

Altshuler & Berzon; San Francisco, California **1985 – 1989**
Associate Attorney

Represented individuals, labor unions, and non-profit organizations in employment, labor, and environmental matters.

The Honorable Jack B. Weinstein, Chief Judge **1984 – 1985**
United States District Court for the Eastern District of New York
Law Clerk

PUBLISHED CASES

Dunsmore v. County of San Diego, __ F. Supp. 3d __, 2025 WL 675353 (S.D. Cal. March 3, 2025)
Armstrong v. Newsom, 724 F. Supp. 3d 886 (2024)
Armstrong v. Newsom, 58 F.4th 1283 (9th Cir. 2023)
Armstrong v. Newsom, No. 94-CV-02307 CW, 2021 WL 933106 (N.D. Cal. Mar. 11, 2021), *aff'd in part, vacated in part*, 58 F.4th 1283 (9th Cir. 2023)
Armstrong v. Newsom, 484 F. Supp. 3d 808 (N.D. Cal. 2020), *aff'd*, 58 F.4th 1283 (9th Cir. 2023)
Armstrong v. Newsom, 475 F. Supp. 3d 1038 (N.D. Cal. 2020)
Armstrong v. Brown, 103 F. Supp. 3d 1070 (N.D. Cal. 2015)
Armstrong v. Brown, 732 F.3d 955 (9th Cir. 2013), *cert denied*, 134 S. Ct. 2725 (2014)
Armstrong v. Brown, 939 F. Supp. 2d 1012 (N.D. Cal. 2013)
Armstrong v. Brown, 857 F. Supp. 2d 919 (N.D. Cal. 2012)
Armstrong v. Brown, 805 F. Supp. 2d 918 (N.D. Cal. 2011)
Armstrong v. Schwarzenegger, 622 F.3d 1058 (9th Cir. 2010)
Olabi v. Neutron Holdings, Inc., 50 Cal. App. 5th 1017 (2020)
Brome v. California Highway Patrol, 44 Cal. App. 5th 786 (2020) *aff'd in part by Stiner v. Brookdale Senior Living, Inc.*, 810 F. App'x 531 (9th Cir. 2020)
Stiner et al. v. Brookdale Senior Living, Inc. et al., No. 17-cv-03962-HSG, 2024 WL 3498492 (N.D. Cal. July 22, 2024)
Stiner et al. v. Brookdale Senior Living, Inc. et al., 665 F. Supp. 3d 1150 (N.D. Cal. 2023)
Stiner et al., v. Brookdale Senior Living, Inc. et al., 383 F. Supp. 3d 949 (N.D. Cal. 2019)
Stiner et al. v. Brookdale Senior Living, Inc. et al., 354 F. Supp. 3d 1046 (N.D. Cal. 2019)
Hernandez v. County of Monterey, 110 F. Supp. 3d 929 (N.D. Cal. 2015)
Hernandez v. County of Monterey, 305 F.R.D. 132 (N.D. Cal. 2015)
Hernandez v. County of Monterey, 70 F. Supp. 3d 963 (N.D. Cal. 2014)
Sassman v. Brown, 99 F.Supp.3d 1223 (E.D. Cal 2015)
Sassman v. Brown, 73 F.Supp.3d 1241 (E.D. Cal. 2014)
Ramirez v. Ghilotti Bros. Inc., 941 F. Supp. 2d 1197 (N.D. Cal. 2013)
L.H. v. Schwarzenegger, 645 F. Supp. 2d 888 (E.D. Cal 2009)
L.H. v. Schwarzenegger, 519 F. Supp. 2d 1072 (E.D. Cal. 2007)
Sacramento Old City Assn. v. City Council, 229 Cal. App. 3d 1011 (1991)
AFL-CIO v. Deukmejian, 212 Cal. App. 3d 425 (1989)
Patel v. Quality Inn South, 846 F.2d 700 (11th Cir. 1988)
International Union, United Automobile, Aerospace and Agricultural Implement Workers v. Brock, 816 F.2d 761 (D.C. Cir. 1987)
County of Los Angeles v. State of California, 43 Cal. 3d 46 (1987)
K & M Glass Co. v. International Brotherhood of Painters,121 L.R.R.M. 3005 (N.D. Cal. 1986)

PUBLICATIONS

"Upholding the rule of law in the face of presidential lawlessness," San Francisco *Daily Journal* (March 7, 2025)
"Jobless Californians Harmed by Dysfunction in State Safety Nets," *San Francisco Attorney Magazine* (Winter 2022) (with Cara Trapani)
"Ending involuntary servitude in California," San Francisco *Daily Journal* (March 10, 2022) (with Marc Shinn-Krantz)
"Overcoming *Pitchess* In Workplace Discrimination Suits," *Plaintiff magazine* (January 2022) (with Priyah Kaul)
"A significant blow to firms looking to arbitrate discrimination claims," San Francisco *Daily Journal* (January 21, 2020) (with Cara Trapani)
"Ending Sexual Orientation Discrimination in Employment," *The Recorder* (February 16, 2018) (with Marc J. Shinn-Krantz)
"The Consequences of Not Responding to Sexual Harassment Allegations," *The Recorder* (March 28, 2017) (with Krista Stone-Manista)
"More women lawyers taking pay equality to court," San Francisco *Daily Journal* (October 13, 2016) (with Jenny Yelin)
"Putting parenting on a firm basis," *San Francisco Attorney* (Summer 2015) (with Jenny Yelin)
"Privilege when firms advise themselves," San Francisco *Daily Journal* (April 3, 2015) (with Sarah Poppy Alexander)
"Construction's Wage and Hour Woes," *The Recorder* (November 4, 2013) (with Megan Sallomi)
"Your First Three Years," *The Recorder* (January 7, 2013)
"Enforcing Settlement Agreements," *The Recorder* (November 5, 2012) (with Benjamin Bien-Kahn)
"Challenges to an at-large election system," *The Recorder* (September 24, 2012) (with Blake Thompson)
"Expanding Partnership Liability," *The Recorder* (July 16, 2012) (with Elizabeth Avery)
"Navigating Expert Witness Disclosure in Federal Courts," *The Recorder* (February 20, 2012) (with Blake Thompson)
"Know What Not to Ask," *The Recorder* (November 10, 2011) (with Alyce Perry)
"How Businesses Can Protect Their Valuable Trade Secrets," San Francisco *Daily Journal* (September 26, 2011) (with Aaron J. Fischer)
"Get the Most Out of Your Expert," *The Recorder* (April 27, 2011) (with Blake Thompson)
"A Picture is Worth a Thousand Words," San Francisco *Daily Journal* (March 23, 2011) (with Leslie Thornton)
"No Time To Waste," *The Recorder* (November 16, 2009) (with Amy Whelan)
"Cases of Two Women Illustrate Harm of Mandatory Arbitration Clauses," San Francisco *Daily Journal* (August 7, 2009) (with Nura Maznavi)
"Without Reform, California's Juvenile Justice System Will Condemn Youth To Bleak Future," San Francisco *Daily Journal* (October 8, 2007) (with Michael W. Bien)
"Some Reflections on Conflicts Between Government Attorneys and Clients" 1 Touro L. Rev. 1 (1985) (with Jack B. Weinstein)

"Article III Problems in Enforcing the Balanced Budget Amendment," 83 Colum. L. Rev. 1065 (1983).

PRESENTATIONS

- Panelist, "In Custody Death & Abuse Town Hall," Racial Justice Coalition of San Diego, May 8 and July 24, 2025, San Diego, California
- Moderator, "What are Potential Solutions to the Homelessness Crisis?" Ninth Circuit Court of Appeals Annual Conference, Portland, Oregon, August 3, 2023
- Testimony before Subcommittee No. 5 of the California Senate Budget and Fiscal Review Committee on CDCR's Court-Ordered Staff Misconduct Remedies. March 2, 2023, Sacramento, California
- Presenter (with Rev. Anna Rossi and Alma Robinson), "Ending Slavery for Good," Grace Cathedral, October 17, 2021, San Francisco, California
- Moderator, "Hot Topics in Wage and Hour Law: What Practitioners Need to Know," California Lawyers' Association, Labor and Employment Section, Webinar, December 9, 2020
- Panelist, "Toot Your Own Horn: Mastering the Art of Self-Advocacy," Federal Bar Association's Women Attorneys Advocacy Project, October 22, 2019, San Francisco, California
- Panelist, "Zero Tolerance: Interrupting Bias using the ABA's Toolkit," California Women Lawyers Annual Conference, September 20, 2019, Sacramento, California
- Moderator, "Women in the Courtroom," *Daily Journal* Women Leadership in Law Conference, November 15, 2018, San Francisco, California
- Moderator, "Women and Diverse Lawyers and Business Development," *Daily Journal* Women Leadership in Law Conference, November 15, 2018, San Francisco, California
- Moderator, "The Opioid Crisis: Its Genesis, National Implications, and Potential Solutions," Ninth Circuit Judicial Conference, July 25, 2018, Anaheim, California
- Panelist, Labor & Employment Roundtable, *California Lawyer*, November 2017
- Moderator, "Best Practices for Promoting Fair Pay," Association of Corporate Counsel Diversity and Inclusion Committee Event Featuring Equal Rights Advocates, September 8, 2016
- Panelist, Labor & Employment Roundtable, *California Lawyer*, May 2016
- "Rule 23(b)(2) Revisited: Institutional Reform Cases," Panel at the Impact Fund's 12th Annual Class Action Conference Agenda, February 28, 2014
- "How to Litigate a Wage and Hour Case: Challenges with Representing Foreign Language FLSA Clients," American Association of Justice Annual Conference, July 26, 2013, San Francisco, California

- "Let's Get Real: From 'Win – Win' to 'Can Live With – Can Live With,'" ABA Section of Dispute Resolution Spring Conference, April 5, 2013, Chicago Illinois
- "Representing Classes with Special Challenges," Impact Fund, 11th Annual Class Action Conference, March 1, 2013, Berkeley, California
- "ADA in Jails & Prisons," Workshop at the 2010 Training & Advocacy Support Center of the National Disability Rights Network, P & A/CAP Annual Conference, June 10, 2010, Los Angeles, California
- "Due Process for Juvenile Parolees: What Comes Next After *L.H. v. Schwarzenegger*?," Administrative Office of the Courts' Beyond the Bench XIX: Communicating and Collaborating Conference, December 11-12, 2008, San Francisco, California

EDUCATION

Columbia Law School, New York, New York **J.D., 1984**

Articles Editor, Columbia Law Review
Harlan Fiske Stone Scholar, 1982, 1983, 1984
Charles Bathgate Beck Prize in Property
Parker School Recognition in Foreign and; International Law, with Honors
Public Interest Law Foundation
Teaching Fellow in Property

Wellesley College, Wellesley, Massachusetts **B.A. (Philosophy), 1981**

Phi Beta Kappa
Graduated Durant Scholar (highest honors)

BAR ADMISSIONS

State Bar of California, No. 121944 (1985)
Supreme Court of the United States
U.S. Court of Appeals for the Ninth Circuit
U.S. District Courts for the Southern, Eastern, and Northern Districts of California

PROFESSIONAL AWARDS AND HONORS

Daily Journal Top 100 Lawyers in California (2014, 2015, 2016, 2020-2024)
Daily Journal Top Women Lawyers (2011-2025)
Equal Rights Advocates Gender Justice Honoree (2016)
Best Lawyers in America, Employment Law (2016, 2017, 2020-2025)
Northern California "Super Lawyer" in General Litigation (2012-2025) (Top 100) (2012, 2016) (Top 50 Women) (2012-2018, 2020, 2021)
California Lawyer Attorneys of the Year Award ("CLAY") (2013, 2016)
The Recorder, Attorney of the Year (2012)
California Women Lawyers' Fay Stender Award (1995)
Martindale Hubbell AV Peer Review Rated

PROFESSIONAL AFFILIATIONS AND ACTIVITIES

Trustee, Grace Cathedral Board of Trustees (2025 –)
Member, Circuit Executive Committee, Ninth Circuit Court of Appeals (2017 – 2023)
Boiler Room Volunteer, Voter Protection for Nevada Coordinated Democratic Campaign (2020, 2022, 2024)
Member, Finance Committee, Biden for President (2020, 2023-2024); Harris Victory Fund (2024)
Trustee, San Francisco Law Library (2016 – 2020), Vice President (2020 – Present)
Representative, Lawyers Representative Committee, N.D. Cal. (2014 – 2017)
Member, Finance Committee, Clinton for President (2016)
Board of Directors, Equal Rights Advocates (2011 – 2017); Vice Chair (2013 – 2017)
Member, Committee on Gender Equity, California Women Lawyers (2012 – 2014)
Judge *Pro Tempore*, San Francisco Superior Court (2004 – 2007, 2012)
Judicial Arbitrator, Santa Clara Superior Court (2004 – 2005)
Judge *Pro Tempore*, Santa Clara Superior Court (2004 – 2005)
Pro Bono Counsel, Adolescent Counseling Services (2003 – 2004)
Member, Santa Clara County Bar Association (2001 – 2005)
Member, Palo Alto Bar Association (2001 – 2005)
Member, San Mateo County Bar Association (2001 – 2005)
Member, Bar Association of San Francisco (1985 – 1997; 2005 – Present)
Member, San Francisco Chronicle Community Advisory Board (1995)
President, San Francisco Women Lawyers Alliance (1992 – 1993)
President, SFWLA Foundation (1990 – 1993)
Director, SFWLA (1988 – 1993)
Member, Coalition to Prevent Lead Poisoning (1992)
Director, Northern California Service League (1988 – 1990)

EXHIBIT B

ROSEN BIEN GALVAN & GRUNFELD LLP

Jenny S. Yelin

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: jyelin@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California

Partner — **January 2022 – Present**
Senior Counsel — **January 2020 – December 2021**
Associate Attorney — **June 2012 – January 2020**

Represent clients in a variety of general and complex civil cases, with a focus on employment and civil rights cases, especially class actions. Significant practice negotiating individual employment and severance agreements, including executive equity compensation packages. Also specialize in representing faculty in public and private academic institutions.

Recent representative federal court matters in which I am or was actively involved:

Coleman v. Newsom, E.D. Cal. 2:90-cv-00520-KJM-DB: we are class counsel on behalf of 38,000 individuals incarcerated in California prisons in this long-standing prison reform case regarding constitutionally inadequate mental health care. *See Brown v. Plata*, 563 U.S. 493 (2011). I am one of the principal attorneys for Plaintiffs. Among other things, I was responsible for briefing in the district court and Ninth Circuit that protected the injunctive requirement that seriously mentally ill patients in crisis be transferred to inpatient mental health care within 24 hours. *Coleman v. Brown*, 756 F. App'x 677 (9th Cir. 2018).

Stiner v. Brookdale Senior Living, Inc. et al., N.D. Cal No. 4:17-CV-03962-HSG (LB): in this class action on behalf of seniors and people with disabilities, we achieved the first ever ruling (based on contested proceedings) that the Americans with Disabilities Act applied to Assisted Living Facilities. We also achieved a ground-breaking injunctive relief settlement, including an agreement to remediate access barriers at three Brookdale facilities in California. The final fairness hearing is scheduled for October 2025. I was responsible for a near complete win in the Ninth Circuit on the Defendants' appeal of the district court's denial of a motion to compel arbitration. *See Stiner v. Brookdale Senior Living, Inc*., 810 F. App'x 531 (9th Cir. 2020).

Brocas et al. v. University of Southern California et al., C.D. Cal. No. 2:23-cv-07280-MEMF(PDx): I represent two married Professors of Economics at USC who allege unequal pay, discrimination, and retaliation.

Andrews v. Equinox Holdings, Inc., N.D. Cal. No. 3:20-cv-00485-SK: I represented an individual who sued Equinox for age discrimination and prevailed on a summary judgment motion filed by the defendant.

Office of the County Counsel
County of Santa Clara, California
Deputy County Counsel **July 2011 – May 2012**
Impact Litigation and Social Justice Fellow **August 2010 – July 2011**

Advised County on employment and labor issues, including reviewing County departments' disciplinary decisions to ensure compliance with employment laws and advising County's Office of Labor Relations. Litigated consumer protection, civil rights, and social justice cases.

EDUCATION

University of California, Berkeley School of Law **J.D., 2010**

California Law Review (2008-2010).

Columbia University; New York, New York **B.A., History, *magna cum laude*, 2004**

Honors: Phi Beta Kappa; Departmental Honors in History

BAR ADMISSIONS, MEMBERSHIPS, AND OTHER PROFESSIONAL ACTIVITIES

State Bar of California, No. 273601 (2010)

Mediator for the United States District Court, Northern District of California, ADR Program. Mediate employment, civil rights, commercial, and other civil cases. (October 2019 – Present)

Member of the Board of Directors, Legal Aid at Work, San Francisco, CA (2023 - Present)

Member, Bar Association of San Francisco and California Employment Lawyers Association

PROFESSIONAL AWARDS AND HONORS

Daily Journal Top Labor and Employment Attorney, 2023-2025

Lawdragon, 500 Leading Plaintiff Employment and Civil Rights Lawyers, 2024

Super Lawyer (2023-2025)

Northern California Super Lawyers Rising Star (2016-2022)

Martindale Hubbell AV Preeminent Rating

PUBLICATIONS

"California Supreme Court Issues Decision on Use of Private Email," *The Recorder* (March 8, 2017) (with Ernest Galvan);

"More women lawyers taking pay equality to court," San Francisco *Daily Journal* (October 13, 2016) (with Gay Grunfeld);

"Putting parenting on a firm basis," *San Francisco Attorney* (Summer 2015) (with Gay Grunfeld).

EXHIBIT C

ROSEN BIEN GALVAN & GRUNFELD LLP

Benjamin Bien-Kahn

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: bbien-kahn@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld, LLP, San Francisco, California
Senior Counsel **January 2019 – Present**
Associate Attorney **April 2012 – December 2018**

Practices general and complex civil litigation in federal and state courts at the trial and appellate levels, with focus on class action litigation, constitutional and civil rights law, business disputes, disability rights, and employment law. He has substantial experience litigating class actions on behalf of people with disabilities, as well as monitoring compliance with injunctions in the long-standing prison reform case *Armstrong v. Newsom*. He has successfully litigated wrongful death cases on behalf of the families and estates of incarcerated persons whose deaths in custody were caused by the deliberate indifference of prison and jail officials, and First Amendment cases enforcing the rights of publishers to communicate with people in county jails.

Law Offices of Geri Lynn Green, LC **July 2011 – March 2012**
San Francisco, California
Attorney

Litigated successful federal criminal defense of client facing RICO charges; drafted pre- and post-trial motions, subpoenas, jury instructions, and trial memoranda; analyzed transcripts and discovery; prepared witness binders and cross-examination outlines; assisted with trial strategy; second chair for key hearings and witness examinations.

California Appellate Project, San Francisco, California **Spring 2011**
Volunteer Attorney

Drafted *habeas corpus* petition challenging execution following prolonged confinement in unconstitutional conditions.

Law Clerk to the Honorable Rosemary Barkett **January 2010 – December 2010**
U.S. Court of Appeals for the Eleventh Circuit
Miami, Florida

Conducted legal research regarding issues of constitutional, criminal, immigration and procedural law; prepared cases for oral argument; and drafted judicial opinions and persuasive legal memoranda seeking and opposing en banc review.

American Civil Liberties Union of Northern California **Summer 2008**
San Francisco, California
Police Practices Policy Intern

Aided successful effort to cut funding for surveillance cameras invading privacy on public streets; drafted letter to law enforcement on the dangers of the use of Tasers; prepared responses to opponents of sunshine ordinance; investigated police harassment claim.

Disability Rights Education and Defense Fund **Summer 2007**
Berkeley, California
Legal Intern

Conducted organizational outreach for investigation into special education in jails and prisons; drafted memorandum on administrative exhaustion requirements under the Individuals with Disabilities Education Act; drafted demand letter for public accommodation discrimination case.

House Minority Leader Nancy Pelosi **Summers of 2003 and 2004**
Washington, D.C. and San Francisco, California
Intern

EDUCATION

UCLA School of Law, Los Angeles, California **J.D., May 2009**

Honors: Order of the Coif; Judge Jerry Pacht Constitutional Law Award, presented annually to one third-year student who has "demonstrated excellence in the field of constitutional law throughout his or her law school career."

Activities: El Centro Legal Clinics – Downtown Housing Clinic

Tufts University, Medford, MA **B.A. in History, *magna cum laude*, May 2004**

BAR ADMISSIONS

State Bar of California, No. 267933 (2009)
United States Supreme Court
U.S. Court of Appeals for the Ninth Circuit
U.S. District Courts for the Eastern, Central and Northern Districts of California

PUBLISHED CASES

U.S. WeChat Users Alliance v. Trump, 488 F. Supp. 3d 912 (N.D. Cal. 2020) (granting on First Amendment grounds preliminary injunction against President Trump's Executive Order 13,943 and its implementing regulations, which would have effectively banned the WeChat social media application and cut off 19 million daily users in the United States)

Brome v. California Highway Patrol, 44 Cal. App. 5th 786 (2020) (reversing summary judgment on statute of limitations grounds officer's Fair Employment and Housing Act sexual orientation discrimination and harassment claims, reaffirming importance of applying equitable doctrines to allow employment claims to be heard on the merits)

Stiner et al. v. Brookdale Senior Living, Inc. et al., 383 F. Supp. 3d 949 (N.D. Cal. 2019) (denying motion to dismiss disability and consumer fraud claims by California assisted living residents in putative class action against the largest assisted living provider in the United States, and holding for the first time that assisted living facilities are covered by Title III of the ADA)

PROFESSIONAL HONORS AND AWARDS

California Lawyer Attorney of the Year Award (2022)

Northern California SuperLawyer (2023 – 2025)

Northern California SuperLawyers Rising Star (2014 – 2022)

Martindale-Hubbell A-V Rated

PUBLICATIONS/PRESENTATIONS

Presenter, "The Impact of the ADA on Police Accountability in Prisons," Bar Association of San Francisco, Equality Committee on Disability Rights (June 18, 2024)

Presenter, "Breaking the Cycle Between Homelessness and Incarceration," Bar Association of San Francisco, Equality Committee on Disability Rights (December 12, 2023)

Presenter, "2021 Disability Employment Law Updates," Bar Association of San Francisco, Equality Committee on Disability Rights (January 31, 2022)

Presenter, "2020 Disability Employment Law Updates," Bar Association of San Francisco, Equality Committee on Disability Rights (January 13, 2021)

Presenter, "2019 Disability Employment Law Updates," Bar Association of San Francisco, Equality Committee on Disability Rights (January 16, 2020)

Presenter, "Applying *Olmstead*'s Integration Mandate to Barriers to Successful Reentry for People with Disabilities After Incarceration," Jacobus tenBroek Disability Law Symposium (March 28, 2019)

Presenter, "2018 Disability Employment Law Updates," Bar Association of San Francisco, Equality Committee on Disability Rights (December 11, 2018)

Presenter, "Pleading, Winning, and Enforcing ADA Class Actions," Bar Association of San Francisco, Equality Committee on Disability Rights (January 27, 2016)

"Enforcing Settlement Agreements," The Recorder (November 5, 2012) (with Gay Grunfeld)

PROFESSIONAL ASSOCIATIONS

Chair of Equality Committee for Disability Rights, Bar Association of San Francisco (2023 on)

Member, Disability Rights Bar Association

EXHIBIT D

ROSEN BIEN GALVAN & GRUNFELD LLP

Christopher Hu

50 Fremont Street, 19th Floor
San Francisco, California 94105-2235

T: (415) 433-6830
F: (415) 433-7104
E: chu@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **October 2015 – February 2018**
Associate Attorney

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Supreme Court of California **September 2014 – September 2015**
San Francisco, California
Law Clerk to Justice Goodwin Liu

Drafted bench memos, opinions, and memos concerning petitions for review.

U.S. Court of Appeals for the Ninth Circuit **August 2013 – August 2014**
Pasadena, California
Law Clerk to the Honorable Kim McLane Wardlaw

Drafted bench memos, published and unpublished dispositions, and *en banc* memos.

Stanford Law School Supreme Court Litigation Clinic **Spring 2012 & Spring 2013**
Stanford, California
Certified Law Student

Researched and drafted sections of two U.S. Supreme Court petitions for certiorari and one brief in opposition to certiorari; participated in workshop discussions of all clinic briefs.

Phillips & Cohen LLP, San Francisco, California **Summer 2012**
Summer Associate

Conducted legal research related to False Claims Act litigation and tax and securities whistleblower claims; drafted *amicus* brief on Article III standing of *qui tam* relators.

Gilbert & Sackman, Los Angeles, California **Summer 2011**
Summer Law Clerk

Awarded Peggy Browning Fund fellowship for summer position at union-side labor law firm; worked on labor arbitration and employee benefits litigation

Bishop Museum (Hawai'i State Museum of Natural & Cultural History) **2008 – 2010**
Honolulu, Hawai'i
Development Assistant

University of Pennsylvania Press, Philadelphia, Pennsylvania **2006 – 2008**
Acquisitions Assistant

EDUCATION

Stanford Law School, Stanford, California **J.D., 2013**

Honors & Activities: President, *Stanford Law Review*; Gerald Gunther Prize for Outstanding Performance in Administrative Law; Judge Thelton E. Henderson Prize in Supreme Court Litigation Clinic; Quarterfinalist, Kirkwood Moot Court Competition; Research Assistant to Professor William B. Gould IV

Brown University, Providence, Rhode Island **B.A., *magna cum laude*, 2006**
English and Political Science

Honors: Phi Beta Kappa; Preston Gurney Prize in Literary Criticism

BAR ADMISSIONS

State Bar of California No. 293052 (2013)

EXHIBIT E

ROSEN BIEN GALVAN & GRUNFELD LLP

Devin W. Mauney

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: DMauney@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2017 – 2018**
Associate Attorney

General and complex civil litigation, with an emphasis on civil rights, consumer protection, employment, disability rights, and commercial disputes, at the trial court and appellate levels.

United States Court of Appeals for the Third Circuit **September 2016 – August 2017**
Wilmington, Delaware
Judicial Law Clerk to the Honorable Thomas Ambro

Assisted in the resolution of appeals before the U.S. Court of Appeals for the Third Circuit.

United States District Court for the District of Columbia **August 2014 – April 2016**
Washington, District of Columbia
Judicial Law Clerk to the Honorable Gladys Kessler

Assisted in the resolution of cases before the U.S. District Court for D.C.

Consumer Financial Protection Bureau
Washington, District of Columbia
Counsel to the Deputy Director and Associate Director **April 2014 – August 2014**
for Supervision, Enforcement, and Fair Lending

Advised on legal and policy matters, including enforcement actions; represented Division of Supervision, Enforcement, and Fair Lending at interoffice meetings; reviewed regulatory guidance, decision memoranda, and documents for public release; drafted briefing materials for congressional hearings.

Special Assistant to the Enforcement Director **August 2013 – March 2014**

Assisted Enforcement Director's management of the Office of Enforcement; advised on developments in the law; drafted decision memoranda resolving supervisory appeals; served as Office's primary contact for Bureau's Executive Secretary; represented Office before Civil Penalty Fund Governance Board; produced biweekly reports on enforcement actions and consumer redress; reviewed documents for agency-wide clearance; wrote public presentations for Enforcement Director; analyzed team performance metrics.

Legal Intern **July 2012 – August 2012**
June 2011 – August 2011

Assisted ongoing investigations and drafted legal memoranda concerning the Dodd-Frank Act.

Federal Reserve Board of Governors **May 2012 – June 2012**
Washington, District of Columbia
Summer Law Clerk

Drafted legal memoranda on the Board's enforcement and rulemaking procedures; produced briefing materials for congressional hearings.

EDUCATION

Harvard Law School, Cambridge, Massachusetts **J.D., *magna cum laude*, 2013**

Honors: Dean's Scholar Prizes (top grade) in seven courses; Heyman Fellowship (academic excellence and demonstrated commitment to public service)

Activities: Editor, *Harvard Law and Policy Review*; Harvard College Teaching Fellow, Bioethics (awarded Harvard University Certificate of Distinction in Teaching); Volunteer, Harvard Immigration Project; Student-Attorney, Predatory Lending/Consumer Protection Clinic

Barrett Honors College, Arizona State University **B.S., *summa cum laude*, 2009**
Tempe, Arizona **Economics**

Honors: Harry S. Truman Scholar; Phi Beta Kappa

Study abroad: Pontifical Catholic University of São Paulo, Brazil, Fall 2007.

BAR ADMISSIONS

State Bar of California No. 294634 (2013)
U.S. District Court for the District of Columbia No. D00437 (2015)
U.S. District Court for the Northern District of California (2017)
U.S. District Court for the Eastern District of California (2017)
U.S. Court of Appeals for the Third Circuit (2017)

LANGUAGES

Fluent in Spanish; proficient in Portuguese

EXHIBIT F

ROSEN BIEN GALVAN & GRUNFELD LLP

Amy Xu

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: AXu@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2019 – 2024**
Associate Attorney

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

U.S. District Court, Eastern District Of California **September 2017 – August 2019**
Fresno, California
Law Clerk to the Honorable Dale A. Drozd

Research and draft orders on dispositive motions for civil cases, including preparing bench memos for oral arguments; assist with preparation for jury trials, including pretrial conferences, jury instructions, and motions in limine; oversee administrative tasks within chambers, including managing Judge Drozd's civil law and motion calendar, hiring interns, and reviewing future clerkship applications.

Eversheds Sutherland LLP, Washington, D.C.
Associate **October 2015 – July 2017**
Summer Associate **May 2014 – July 2014**

Represented financial firms, broker-dealers, and investment advisers in investigations before the SEC and FINRA; counseled clients on regulatory and compliance matters including cybersecurity and privacy concerns, 12b-1 fees and mutual fund share class disclosures, chief compliance officer liability, and other federal securities law issues; drafted legal memoranda, motions, Wells submissions, and discovery responses, prepared materials for production to regulatory bodies, and prepared clients for on the record testimonies and depositions; maintained an active *pro bono* practice, including arguing a case before the Baltimore Immigration Court, resulting in an order granting withholding of removal for a Guatemalan woman seeking safety from an abusive family member; a landlord-tenant case to oppose eviction; a class action on behalf of blind federal contractors to ensure accessibility to SAM.gov; and a petition for resentencing pursuant to *Montgomery v. Louisiana*, 136 S. Ct. 718 (2016).

U.S. District Court, Eastern District of Missouri **Spring 2015**
St. Louis, Missouri
Judicial Intern to the Honorable Audrey G. Fleissig

Member of a multi-disciplinary team to establish the Sentencing Alternatives Improving Lives (SAIL) Program, a diversion program for felony criminal defendants; drafted and revised program operating documents and coordinated training programs; researched employment, emergency housing, and low-income tax preparation resources for program participants.

Missouri State Public Defender, St. Louis, Missouri **Fall 2014**
Intern

Represented clients charged with felony crimes in preliminary hearings before the St. Louis County Circuit Court; drafted substantive motions after interviewing clients, conducting legal research, and investigating factual issues; advocated for clients in a weekly docket of probation revocation hearings, which included conducting intake interviews with clients, negotiating with prosecutors, and assisting in the entry of plea agreements.

Bryan Cave Leighton Paisner LLP, St. Louis, Missouri **Summer 2013**
Summer Associate

Researched and drafted memos for matters, including environmental litigation and breach of government contracts.

EDUCATION

Washington University School of Law, St. Louis, Missouri **J.D., *cum laude*, 2015**

Honors: David M. Becker Scholar in Law (2012-15); Equal Justice Works Award (2015); Marshall-Brennan Fellowship (2015)

Activities: Chief Executive Notes & Projects Editor for *Washington University Journal of Law and Policy*; Research Assistant and Teaching Assistant to Professor Gerrit De Geest for First-Year Contract Law (2014-15); Instructor for Washington University undergraduate course entitled "Women and the Law" (2014-15); High school mock trial coach at Clyde C. Miller Career Academy (2013-15)

Washington University in St. Louis **B.A., *magna cum laude*, 2010**
St. Louis, Missouri **Economics and Political Science**

Honors: John B. Ervin Scholar (4 year full-tuition scholarship for academic excellence, leadership, and service)

BAR ADMISSIONS

New York, 2016
California, 2020

LANGUAGES

Chinese (conversational)

EXHIBIT G

ROSEN BIEN GALVAN & GRUNFELD LLP

Adrienne Spiegel

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: aspiegel@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP **2023 – Present**
Associate Attorney

Practice general and complex civil litigation, with an emphasis on civil rights claims in federal district and appellate courts.

East Bay Community Law Center **2022 – 2023**
Staff Attorney and Clinical Supervising Attorney

Represented teenagers in expulsion, special education, and delinquency matters. As Clinical Supervising Attorney at UC Berkeley School of Law, co-taught seminar on juvenile justice and education law, and supervised law students' clinical work.

The Honorable Marsha S. Berzon, **2021 – 2022**
U.S. Court of Appeals for the Ninth Circuit
Law Clerk

Drafted judicial opinions and internal memoranda on issues spanning constitutional law, criminal law and procedure, immigration law, and administrative law.

Public Justice **2019 – 2021**
Legal Fellow

Developed § 1983 suit based on fatal denial of medical care in Texas jail, and defeated motion to dismiss based on qualified immunity. Drafted Third Circuit brief on behalf of meatpacking-plant workers whom OSHA failed to protect during the pandemic, advancing novel interpretation of OSH Act provision. Represented K-12 and college students in civil rights matters against their schools.

San Francisco City Attorney's Office, **Summer 2018**
Complex And Affirmative Litigation Team
Law Clerk

Wrote California Supreme Court brief. Researched discovery privileges. Reviewed contracts.

San Francisco Public Defender's Office **January 2018**
Law Clerk

Wrote felony-reduction and suppression motions. Prepared arguments for preliminary hearing.

National Center For Youth Law **Summer 2017**
Law Clerk

Researched claims for due process challenge to state's over-medication of foster youth. Wrote memo on source and scope of government duties. Drafted opposition to motion to dismiss.

American Civil Liberties Union **June 2013 – March 2016**
LGBT & HIV Project
Paralegal

Edited appellate and Supreme Court briefs. Created and maintained spreadsheets tracking all marriage cases (80+) between *Windsor* and *Obergefell*, and all early-stage employment discrimination cases, including *Bostock*. Worked closely with lead attorney on *Masterpiece Cakeshop* before Colorado Court of Appeals. Oversaw intake. Served as the paralegal representative on committee redesigning ACLU's national litigation database.

Genders & Sexualities Alliance Network
Board Member **2020 – Present**
Board Co-Chair **2021 – 2023**

Co-led Board of Directors. Oversaw executive transition.

EDUCATION

Harvard Law School **J.D., *cum laude*, 2019**

Honors: Klemens von Klemperer Writing Prize; Dean's Prize for academic performance in Criminal Procedure (Adjudications), Employment Law, and Public Problems Seminar

Activities: Teaching Fellow for Criminal Procedure (Investigations); Contributor at OnLabor.org; Research Assistant for Professors Andrew Crespo and Benjamin Sachs; Training Director and Mediator for Harvard Mediation Program

Yale University **B.A., Philosophy, *with distinction*, 2012**

Activities: Dwight Hall Academic Mentoring Program; Urban Resources Initiative; Student Director ("Poobah") of Freshman Outdoor Orientation Trips; Women's Rugby

BAR ADMISSIONS

State Bar of California, No. 330482 (2020)

PROFESSIONAL ASSOCIATIONS

Member, Federal Bar Association's Northern District of California Chapter

EXHIBIT H

ROSEN BIEN GALVAN & GRUNFELD LLP

Brenda Muñoz

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: BMunoz@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2024 – Present**
Associate Attorney **2022 – 2023**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

U.S. District Court for the Northern District of California **2023 – 2024**
Law Clerk to the Honorable Lisa J. Cisneros

Researched and drafted bench memoranda, orders, and opinions in various areas of federal and state law. Responsible for all aspects of case management and docket administration. Reviewed and recommended final disposition of discovery and other pretrial motions.

Morrison & Foerster LLP, San Francisco, California
Litigation Associate **September 2019 – February 2022**
Summer Associate **Summer 2018**

Represented clients in a wide variety of litigation matters, including consumer class actions, white collar, and securities actions. Assisted with depositions and witness interviews in various internal corporate investigations and Delaware Chancery Court breach of contract actions. Drafted briefs, motions, discovery requests and responses, and memoranda in multiple federal Telephone Consumer Protection Act class action matters. Experienced in managing and organizing document production projects. Significant *pro bono* work on behalf of asylum seekers and DACA recipients in immigration matters before United States Citizenship and Immigration Services (USCIS).

California Supreme Court, San Francisco **August 2018 – December 2018**
Judicial Extern to Justice Mariano-Florentino Cuéllar

Worked with chambers attorneys to advise the justice concerning which matters should be granted review. Engaged in research and writing to help the justice's chambers assess draft opinions circulated by other chambers. Prepared research relevant to matters assigned to the justice's chambers.

East Bay Community Law Center, Berkeley, California **January 2019 – May 2019**
Student Intern **August 2017 – May 2018**

Represented an asylum-seeker in removal proceedings before the San Francisco Immigration Court. Researched, drafted, prepared, and filed supporting documentation with the San Francisco Immigration Court and USCIS as part of that asylum petition and accompanying adjustment of status application.

EDUCATION

University of California, Berkeley, School of Law **J.D., 2019**

Honors: Prosser Prize, Spring 2019: The Constitution in Wartime; Best Oral Argument in Writing & Oral Advocacy section; *California Law Review* 2018 Diversity Award

Activities: California Law Review, Development Editor; *Berkeley La Raza Law Journal*, Managing Editor

Stanford University **B.A., with distinction, Political Science, 2014**

Honors: Interdisciplinary Honors in Comparative Studies in Race & Ethnicity; 2014 Jerry I. Porras Chicano/Latino Community Scholar Prize for Academic Excellence

BAR ADMISSIONS

State Bar of California, No. 328813 (2019)

PROFESSIONAL AFFILIATIONS AND ACTIVITIES

San Francisco La Raza Lawyers Association
East Bay La Raza Lawyers Association

LANGUAGES

Spanish

EXHIBIT I

ROSEN BIEN GALVAN & GRUNFELD LLP

Maya E. Campbell

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: mcampbell@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2023 – Present**
Associate Attorney

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

U.S. District Court, Central District of California **February 2022 – June 2023**
Los Angeles, California
Law Clerk to the Honorable Maame Ewusi-Mensah Frimpong

Edelson, P.C., San Francisco, California
Litigation Associate **September 2021 – January 2022**

Practice covered multiple areas, including mass torts, consumer protection, and data privacy. Authored or substantially contributed to motions for matters before federal court and researched complex issues for client advising and internal use.

Summer Associate **Summer 2020**

Drafted litigation and case development memos for the consumer protection, mass torts, and privacy litigation practice groups. Drafted multiple briefs including an opposition to a motion for summary judgment and a memorandum for final settlement approval. Attended hearings and mediation sessions.

American Civil Liberties Union, San Francisco, California **September – December 2020**
Intern, Immigrants' Rights Project

Conducted legal and fact research for litigation relating to Title 42, deportation defense, and asylum claims.

U.S. District Court, Northern District of California **January – April 2020**
Oakland, California
Judicial Extern to the Honorable Donna M. Ryu

Public Counsel, Los Angeles, California **Summer 2019**
Law Clerk, Opportunity Under Law Project

Performed legal and factual research for memos addressing federal and state constitutional questions relating to the right to literacy and education, equal opportunity, and civil rights.

Performed fact-based research for case development. Attended client and community meetings with organizational partners.

Cohen Milstein Sellers & Toll, PLLC, Washington, D.C. **June 2015 – April 2018**
Paralegal, Antitrust Practice Group

Provided comprehensive litigation support to attorneys including deposition preparation, Bluebook citation and filings in state and federal court. Performed factual and legal research. Maintained case files. Served as paralegal to lead counsel on the Flint Water consolidated class action litigation.

EDUCATION

University of California, Berkeley, School of Law **J.D., 2021**

Honors: American Jurisprudence Award: Civil Rights in American History (Fall 2019); Henderson Scholar; Public Interest and Social Justice Certificate

Activities: Senior Articles and Essays Editor (Vol. 109), *California Law Review*; Student Member, Curriculum Committee, 2020-21; Co-Chair, Womxn of Color Collective, 2019-20; Black History Month Chair, Law Students of African Descent, 2019-20; Student Researcher, International Human Rights Workshop; 2019 Third-Place Defense Team, Bales Mock Trial Competition; 2020-21 Fellow, The Appellate Project; Queer Caucus; Research Assistant to Professors Joy Milligan and Dylan C. Penningroth

Reed College, Portland, Oregon **B.A., History, 2015**

Honors: Commendation for Academic Excellence; Initiative Grant in Undergraduate Research

Activities: Intern, Multicultural Resource Center; Research Assistant to Professor Margot Minardi, Department of History

BAR ADMISSIONS

State Bar of California, No. 345180 (2022)

PROFESSIONAL HONORS AND AWARDS

Northern California SuperLawyers Rising Star (2024-2025)

PUBLICATIONS/PRESENTATIONS

Note, *"Perceived to be Deviant": Social Norms, Social Change, and New York State's "Walking While Trans" Ban*, 110 CALIF. L. REV. 1065 (June 2022).

LANGUAGES

French (professional working proficiency)

EXHIBIT J

ROSEN BIEN GALVAN & GRUNFELD LLP

Ginger Jackson-Gleich

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: GJackson-Gleich@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2022 – January 2024**
Associate Attorney

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Supreme Court of California, San Francisco California
Law Clerk to the Honorable Joshua Groban **November 2021 – August 2022**
Law Clerk to the Honorable Mariano-Florentino Cuéllar **August – October 2021**

Compassionate Release Clearinghouse **January 2021 – August 2021**
***Pro Bono* Attorney**

The Prison Policy Initiative, Easthampton, Massachusetts **August 2020 – July 2021**
Policy Counsel

Working remotely from California, wrote 50-state reports on jail voting and jury exclusion. Advocated for prison gerrymandering reform.

U.S. District Court for the Northern District of California **July 2019 – August 2020**
Law Clerk to the Honorable Edward M. Chen

Wrote bench memos. Drafted orders and opinions. Assisted with trials. Supervised legal externs.

Alameda County Public Defender's Office **September 2018 – July 2019**
Oakland, California
Post-Bar Legal Assistant

Interviewed Spanish- and English-speaking clients. Represented clients at arraignment. Wrote and argued motions and wrote legal memos.

Alameda County Public Defender's Office **May 2017 – August 2017**
Oakland, California
Summer Law Clerk

Drafted appellate briefs. Wrote legal research memos. Assisted attorneys in preparation for trial.

American Civil Liberties Union, New York, New York **July 2016 – August 2016**
Intern, Criminal Law Reform Project

Wrote memoranda discussing legal theories for litigation of challenges to indigent defense systems. Investigated legislative history of state drug laws. Interviewed jury venire for death penalty appeal.

Department of Justice, Civil Rights Division, Washington, D.C. **May 2016 – July 2016**
Intern, Special Litigation Section

Drafted compliance documents for consent decrees. Wrote legal memos on discriminatory policing. Collected evidence of excessive use of force by police. Wrote memo on protections for LGBT prisoners.

Human Rights Watch, New York, New York **January 2016 – April 2016**
Legal Intern, U.S. Program

Conducted legal and empirical research for report on criminalization of drug possession in the U.S.

Harvard Defenders, Cambridge, Massachusetts **2015 – 2018**
Student Attorney & Director of Training

Provide free representation to low-income defendants at show-cause hearings. Designed and organized monthly trainings covering ethics, legal defense strategies, and investigation and representation skills.

Mount Tamalpais College, San Quentin, California **2010 and 2014**
Tutor and Teaching Assistant

San Francisco University High School, San Francisco, California **2010 – 2015**
Director of Student Leadership, Class Dean, & Teacher

Developed and directed student leadership program. Led team of senior class advisors. Taught AP Economics.

San Francisco Bar Association, San Francisco, California **2009**
Bilingual Legal Interviewer

Interviewed Spanish- and English-speaking clients. Referred clients to attorneys, legal services, and clinics.

Office of Mayor John Hickenlooper, Denver, Colorado **2008**
Special Assistant

Wrote speeches. Staffed the Mayor at events. Communicated with constituents on behalf of the Mayor's Office.

EDUCATION

Harvard Law School, Cambridge, Massachusetts **J.D., *cum laude*, 2018**

Honors: Harvard University Presidential Public Service Fellowship; James Vorenberg Equal Justice Summer Fellowship; Heyman Summer Internship for Federal Government Service

Activities: Editor and Outreach Chair, *Harvard Law Review*; Research Assistant to Professor Philip Heymann

University of California, Berkeley **M.A., Jurisprudence and Social Policy, 2010**

Honors: Philip Selznick Fellowship for Jurisprudence and Social Policy; Law and Economics Fellowship

Activities: Research Assistant to Professor Frank Zimring

University of North Carolina, Chapel Hill **B.A., Highest Distinction, May 2007**
Political Science and Economics

Honors: Phi Beta Kappa; John Motley Morehead Scholarship (merit scholarship—now called the Morehead-Cain Scholarship); Chancellor's L. Richardson Preyer Award for Excellence in Political Science; Undergraduate Fellow, Center for the Study of the Presidency, Washington, D.C.

Thesis: The Impact of Felony Disenfranchisement on Voter Turnout Among Eligible, Non-Felon Voters (Highest Honors)

BAR ADMISSIONS

State Bar of California, No. 324454 (2018)

PUBLISHED CASES

PUBLICATIONS/PRESENTATIONS

PROFESSIONAL AFFILIATIONS AND ACTIVITIES

LANGUAGES

EXHIBIT K

ROSEN BIEN GALVAN & GRUNFELD LLP

Ben Hattem

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: BHattem@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2024 – Present**
Associate Attorney **2022 – 2023**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

U.S. Court of Appeals for the Ninth Circuit **2023 – 2024**
Law Clerk to the Honorable William Fletcher

Researched and wrote bench memoranda and draft opinions.

Supreme Court of California **2021 – 2022**
Law Clerk to the Honorable Goodwin H. Liu

Researched and wrote bench memoranda and draft opinions.

United States District Court for the Middle District of Alabama **2020 – 2021**
Law Clerk to the Honorable Myron H. Thompson

Researched and wrote bench memoranda and draft opinions.

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California
Law Clerk **Summer 2019**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Stanford Supreme Court Litigation Clinic
Advanced Clinic Student **Fall 2019**
Clinic Student **Spring 2019**

Merits briefing and oral argument preparation on behalf of the employees in *Bostock v. Clayton County*, 140 S. Ct. 1731 (2020)

Bazelon Center for Mental Health Law, Washington, D.C. **Summer 2018**
Legal Intern

Assisted with complex, class action, and appellate litigation on behalf of individuals with disabilities

Freelance Journalist **2013 – 2017**
New York, New York and Ramallah, West Bank

Conducted investigative and long-form reporting for *Politico* magazine, BuzzFeed News, and others; won various awards and fellowships, including the New York Press Club's 2016 Nellie Bly Cub Reporter Award for best work by a reporter with three or fewer years of professional experience

EDUCATION

Stanford Law School, Stanford, California **J.D., 2020**

Honors: Gerald Gunther Prizes for Outstanding Performance in Civil Procedure, Criminal Procedure: Investigation, and Legal Research and Writing; John Hart Ely Prizes for Outstanding Performance in Cities in Distress and Disability Law; Justice John Paul Stevens Public Interest Fellow

Activities: *Stanford Law Review* (Outstanding Member Editor Service Award); *Stanford Journal of Civil Rights and Civil Liberties*; Teaching Assistant to Professor Pamela Karlan (Constitutional Law); Teaching Assistant to Professor Rabia Belt (Criminal Law); Research Assistant to Professor Michelle Wilde Anderson; Research Assistant to Professor Rabia Belt; Co-Manager, 2018 Shaking the Foundations Conference; Co-President, Record Expungement Pro Bono Project; 3L Public Interest Fellow; 2L Public Interest Mentor; graduated with 300+ hours of *pro bono* work

Swarthmore College, Swarthmore, Pennsylvania **B.A., 2012**

Activities: Student Financial Policy Representative (2011)

BAR ADMISSIONS

State Bar of California, No. 335232 (2020)

PUBLICATIONS/PRESENTATIONS

"Carceral Trauma and Disability Law," 72 STAN. L. REV. 995 (2020)

"How Washington Winks at Violent Discipline of Special Needs Kids," POLITICO MAGAZINE (November 2017)

"The General Who Went to War on Suicide," POLITICO MAGAZINE (Friday cover story; March 2017)

"A Beating at Bellevue, Then Months of Silence," BUZZFEED NEWS INVESTIGATIONS (June 2016)

EXHIBIT L

ROSEN BIEN GALVAN & GRUNFELD LLP

Karen E. Stilber

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: kstilber@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2009 - Present**
Senior Litigation Paralegal

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Responsibilities include: *Class action monitoring and enforcement* – interview and correspond with class members, tour correctional facilities, analyze document productions, and draft portions of compliance reports for attorney review. *Discovery* – manage, review, analyze and code large volumes of documents, review and analyze written discovery and deposition transcripts, assist with deposition preparation. *Motions and other filings in state and federal courts* – draft basic pleadings, fact and cite check, edit and proofread briefs, prepare supporting documents for various types of motions, including motions to compel, summary judgment, class certification and preliminary approval motions, supervise finalization of all papers. Ensure compliance with court rules and assist with filings, including ECF filing. *Appellate work* – edit and cite check briefs filed in appellate courts, prepare appellate appendices, ensure compliance with all rules and procedures, assist attorneys with oral argument preparation. *Research* – conduct legal research using Westlaw and Lexis and factual research relating to case development. *Calendaring* – responsibility for calculating and calendaring case deadlines pursuant to federal, state and local rules.

The Sturdevant Law Firm, San Francisco, California **2006 – 2008**
Litigation Paralegal

Senior paralegal in nationally-recognized plaintiff's firm specializing in class actions. Primary paralegal on several class action matters involving issues relating to consumer protection, unlawful and unfair business practices, predatory lending, false and misleading advertising and federal and state disability nondiscrimination laws.

Preston Gates Ellis, LLP, San Francisco, California
Litigation Paralegal **1999 – 2006**
Litigation Secretary **1998 – 1999**

Worked on wide variety of general civil commercial and employment litigation matters in San Francisco branch of large Seattle-based law firm. Trial and arbitration experience included witness and exhibit preparation, preparation of jury instructions and trial binders. Assisted attorneys at trial.

Bradley, Curley & Asiano, Larkspur, California **1995 – 1998**
Litigation Secretary

Secretary to construction defect litigation attorneys in insurance defense firm.

Barry & Tong, San Francisco, California **1990 – 1995**
Litigation Secretary

Secretary to attorneys in general litigation firm.

EDUCATION

University of North Carolina, Chapel Hill **B.A., International Studies, 1989**

Year Abroad Program, Seville, Spain, 1987-1988

ROSEN BIEN GALVAN & GRUNFELD LLP

Linda H. Woo

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: lwoo@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2015 – Present**
Senior Paralegal

White collar criminal defense; and general and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels. Handle a variety of paralegal duties including: Review documents using Concordance and Relativity; coordinate document productions in complex cases relating to government enforcement matters to the Securities & Exchange Commission and the United States Attorney's Office and create and maintain databases of discovery; participate in meetings with clients, co-counsel, and investigators; legal research using Westlaw and Lexis; assemble deposition, witness and trial binders; and draft letters to clients.

K&L Gates LLP, San Francisco, California **2006 – 2015**
Senior Litigation Paralegal

Handled a variety of paralegal duties including: document review; coordinated document productions; assisted attorneys during depositions and trials with the display of exhibits and graphics using Trial Director; reviewed audit response packages and letters to accounting firms; legal research using Westlaw and Lexis; and assembled deposition, witness and closing binders.

United States Attorney's Office, Northern District of California
Paralegal – White Collar Crimes and Securities Fraud
San Francisco Main Office **August 2002 – January 2006**
Oakland Branch Office **October 1999 – August 2002**

Received the Attorney General's Award for Excellence in legal Support as a Paralegal in August 2001; coordinated document production; created and maintained databases of discovery and trial materials; assisted attorneys during trial using Sanction and PowerPoint; served as press liaison.

United States Attorney's Office, Northern District of California
Chief Legal Technician – Organized Crime Strike Force
San Francisco Main Office **August 1995 – October 1999**

Provided legal support to seven Assistant United States Attorneys; supervised two legal secretaries.

United States Attorney's Office, Northern District of California
Legal Technician – Criminal Division
San Francisco Main Office **June 1988 – August 1995**

Provided legal support to criminal attorneys.

EDUCATION

San Francisco State University **Paralegal Certificate, 1998**
College of Extended Learning **(*with honors*)**

San Francisco State University **B.S., Biology (emphasis in Physiology), 1990**

ROSEN BIEN GALVAN & GRUNFELD LLP

F. Gail LaPurja

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: glapurja@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **April 2015 – Present**
Sr. Paralegal/Notary Public

Assist with management of large class action cases; prepare court filings; conduct legal research; draft and finalize correspondence and pleadings for attorney review/signature; review discovery and court documents and docket as necessary; communicate with clients, opposing counsel, court clerks, etc.; and assist attorneys with trial preparation.

K&L Gates LLP, San Francisco, California **December 2008 – April 2015**
Litigation Secretary/Notary Public

Government Enforcement/White Collar (Criminal Defense), Commercial/Civil Litigation, and Tort/Personal Injury (Asbestos Defense)

Kauff McClain & McGuire LLP, San Francisco, California **June 2008 – December 2008**
Litigation Secretary/Notary Public

Labor and Employment Law and Commercial/Civil Litigation

Winston & Strawn LLP, San Francisco, California **October 2006 – June 2008**
Litigation Secretary/Notary Public

Labor and Employment Law and Commercial/Civil Litigation

Kirkpatrick & Lockhart Nicholson Graham LLP **September 2000 – October 2006**
San Francisco, California
Litigation Secretary/Notary Public

Labor and Employment Law and Commercial/Civil Litigation

McKenna & Cuneo LLP, San Francisco, California **April 2000 – September 2000**
Litigation Secretary/Notary Public

Labor and Employment Law and Commercial/Civil Litigation

McCutchen Doyle Brown & Enerson LLP **March 1999 – March 2000**
San Francisco, California
Litigation Secretary/Notary Public

Commercial/Civil Litigation and Intellectual Property

Hanson Bridgett Marcus Vlahos & Rudy LLP
San Francisco, California **July 1993 – July 1998**
Litigation Secretary/Notary Public
Labor and Employment Law and Commercial/Civil Litigation

Morrison & Foerster LLP, San Francisco, California **June 1990 to July 1993**
Litigation Secretary/Notary Public
Labor and Employment Law and Commercial/Civil Litigation

EDUCATION

University of California, Berkeley, Extension **Certificate in Paralegal Studies, 2015**
With Distinction

Heald Business College **Associate of Applied Science, 1989**
Honors Student; Dean's List

ROSEN BIEN GALVAN & GRUNFELD LLP

Darcy Edmundson

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: dedmundson@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California
Paralegal **2024 – Present**
Paralegal Clerk **2023 – 2024**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Pitzer College Title IX Office, Claremont, California **October 2022 – present**
Title IX Student Assistant

Conceptualized and carried out campus-wide events related to assault-prevention. Collected and interpreted research related to prevention programming and workshops

Center for Employment Opportunities New York, New York **June – October 2021**
Legal and Compliance Intern **June – October 2022**

Expedited the discovery phase of a class-action lawsuit through data retrieval and compilation. Compiled classified documents as a part of a company-wide data organization project

Photoworks Gallery of Glen Echo, Glen Echo, Maryland **August 2017 – June 2019**
Gallery Intern

Supervised gallery hours and informed potential buyers on current exhibitions. Designed and hosted banquets and fundraiser events

EDUCATION

Pitzer College, Claremont, California **B.A., Political Studies, Art History, 2023**

Activities: Co-Head, Pitzer Advocates for Survivors of Sexual Assault (August 2021 May 2023); President, Pitzer Chess Club President (August 2019 – May 2023); Orientation Leader, Orientation Adventure Program (August 2021 and August 2022)

LANGUAGES

Spanish (proficient)

ROSEN BIEN GALVAN & GRUNFELD LLP

Kedra Chan

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: kchan@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2021 – Present**
Paralegal

Assist with management of large class action cases; prepare court filings; conduct legal research; draft and finalize correspondence and pleadings for attorney review/signature; review discovery and court documents and docket as necessary; communicate with clients, opposing counsel, court clerks, etc.

First Republic Bank, San Francisco, California **May 2018 – February 2020**
Executive Assistant to Senior Vice President and
Associate General Counsel for Legal Lending Team

Provided administrative support to the team and worked directly with the Senior Vice President and Associate General Counsel to help increase efficiency by providing effective administrative support including interacting with various departments as a liaison for loan teams or management. Updated outside counsel list of over 250 attorneys by revamping list to allow for selection by region and specialization. Updated process for onboarding new firms to ensure proper documentation was on file. Worked with HR and executive team to develop and streamline hiring process by scheduling, tracking, and greeting potential candidates which led to hiring three new colleagues. Created a welcome packet for new colleagues and provided training on intranet basics and departmental procedures.

Music in Schools Today, San Francisco, California **October 2017 – April 2018**
Salesforce Administrator/Consultant

Designed and integrated grants tracking system using change management best practices and approaches. Fellowship assignment for successfully completing certification program.

O'Melveny & Myers, LLP, San Francisco, California **March 2016 – December 2016**
Executive Assistant

Executive assistant to three high-level stakeholders for the Intellectual Property & Technology Group and the Trademark Group within US, Asia and Europe. Managed complex domestic and international travel. Scheduled individual conference calls with 30+ top level executives in US, Europe and Asia for annual evaluation interview. Maintained business critical email for over 200 clients utilizing MS Outlook folders. Prepared conflict reports for new client requests, existing client new matter requests, and new pro bono client requests and submitted for

approvals. Maintained log of new client/new matter requests. Tracked Continued Legal Education course credit to ensure compliance with practicing law license requirements. Organized and maintained administrative files and case files.

Bryan Cave LLP, San Francisco, California **August 2008 – November 2015**
Administrative Assistant

Provided administrative and legal support to attorneys of the Commercial Litigation, Environmental, and Banking & Real Estate groups. Established procedures and processes for newly opened satellite office. accommodate its 200% growth in first year. Managed complex calendars, domestic travel, time entry and expenses. Automated document onboarding process for new State and Federal actions utilizing existing document management system. Consistently prepared documents for e-filing in all levels of State and Federal court, adhering to court's procedures. Successfully completed 8 e-filings in one day in various matters. Created PowerPoint presentations for new business leads. Member for the firm's Annual United Way Koko Challenge Committee to support the effort to eliminate poverty in the Bay Area. Received Koko Challenge Award three years in a row. Coordinated firm-led real estate forum each month for 50+ attendees.

Skadden Arps LLP, San Francisco, California **September 2005 – August 2008**
Administrative Assistant

Provided legal and administrative support to two partners and two mid-level associates of the Insurance Defense and Mass Torts groups. Established guidelines and procedures for electronic repository of case-specific documents using Documatrix (search, view and retrieve document(s) from database). Drafted legal documents including pleadings, correspondence and memoranda. Completed timely filing of business-critical documents in Federal and State Courts in all levels. Assisted attorneys with pre-trial and trial documentation including drafting of jury instructions, expert witness designations, dispositive motions and trial briefs, and prepared hearing binders. Managed domestic travel, complex calendars and time entry.

EDUCATION

City College of San Francisco

General Education

Salesforce Administrator Certification, Salesforce

LANGUAGES

Spanish, Cantonese

ROSEN BIEN GALVAN & GRUNFELD LLP

Ellie Heywood

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: eheywood@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2019 – 2022**
Paralegal

Assist with management of large class action cases; draft correspondence and communicate with clients; interview class members and potential class members, tour correctional facilities as part of ongoing monitoring of injunctive orders, analyze document productions, and draft portions of compliance reports for attorney review.

Joseph McKeen Center for Common Good **September 2018-March 2019**
Alternative Spring Break Service Trip Leader

Conducted outreach to Puerto Rican non-profits to build a week-long service and learning trip around issues of community health, women's rights, and restoration efforts after hurricane María. Orchestrated, facilitated, and guided weekly educational seminars for college student participants, deepening the group's knowledge of Puerto Rico's sociopolitical and historical context. Handled logistical issues of finding housing, transportation, and volunteer opportunities on the island, while accounting for possible health and safety concerns.

Sexual Assault Response Services of Southern Maine (SARSSM) **June-August 2018**
and Sexual Assault Support Services of Midcoast Maine (SASSMM)
Denning Fellow

For SARSSM, organized and facilitated workshops for the Latinx survivors of sexual violence in the greater Portland area. Conducted workshops in Spanish, translated documents, and compiled a comprehensive report of findings. For SASSMM, curated and developed educational and training materials for service providers about sexual violence against older adults. Improved organization's website design and edited pre-existing training manuals. Wrote and presented a grant proposal for the Forest Foundation (non-profit organization in Boston), as a recipient of Bowdoin College's Denning Fellowship.

Bowdoin College **Sept. 2016-May 2017**
Office Gender Violence Prevention and Education
Production Manager (V-DAY)

Facilitated group discussions with V-Day members surrounding topics of consent, sexism, and female empowerment. Organized, produced, and budgeted "Take Back the Night," and Rise: Untold Stories of Bowdoin Women, fundraising over $2000

Bowdoin College Admissions **Senior Interview – 2018**
Summer Fellow – 2017

Interviewed and recruited prospective students for the incoming class at Bowdoin College. Offered a measured analysis of the student as a candidate through evaluative reports. Promoted, represented, and synthesized aspects of Bowdoin College to prospective students and their families through personally-tailored tours and informational sessions alongside one of the College's Admissions Counselor. Answered and clarified questions about the administrative, academic, and extracurricular structures of the college via face-to-face conversations, email correspondence, and office telephone calls.

Bowdoin College's Senior Class Gift Campaign **December 2018 – May 2019**
Class Agent, Alumni Relations

Engage in outreach efforts to promote philanthropic giving to the college's Alumni Fund. Educate and counsel a cohort of peers to encourage them to make annual donations as alumni.

Bowdoin College **November 2018 – May 2019**
Office for Gender Violence Prevention and Education
Student Program Coordinator

Assisting in the creation, design, and distribution of poster and social media campaigns. Leading and initiating focus-groups with students, faculty, and staff, alongside event-planning and scheduling.

EDUCATION

Bowdoin College, Brunswick, Maine **B.A., 2019**
Government and Legal Studies, Hispanic Studies

Honors: Sarah and James Bowdoin Day Scholar (Dean's List) (2016, 2017); GPA 3.840

University of Salamanca (IES) Salamanca, Spain **Spring 2018**

Intensive Spanish Language and Cultural Immersion Program

Queen's University Belfast **Fall 2017**
Belfast, Northern Ireland

School of Politics and Law, Peace and Conflict

LANGUAGES

Spanish

ROSEN BIEN GALVAN & GRUNFELD LLP

Rebecca Berman

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: rberman@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California
Paralegal **2021 – 2022**
Paralegal Clerk **2020 – 2021**

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Office of the New York State Attorney General **Summer 2019**
New York, New York
Summer Law Intern

Assisted Legal Support Analysts and Assistant Attorneys General in the Public Integrity Bureau with case investigations. Sent subpoenas, analyzed productions, prepared memoranda, completed independent research projects, and attended court proceedings.

Maine Coalition Against Sexual Assault, Augusta, Maine **Summer 2018**
Public Policy Intern

Conducted research on statutes of limitations in Maine and made policy recommendations.

Broadwater Title, Brunswick, Maine **August 2017 – June 2018**
Legal Intern

Set up and organized new client files and recorded documents in county registries. Spoke with town offices to obtain property information and write legal property descriptions.

EDUCATION

Bowdoin College **B.A., Government & Legal Studies and Francophone Studies 2020**
Brunswick, Maine **Minor in Computer Science**

Honors: Year-long independent research project focused on the Politics of Sexual Violence in Supreme Court Confirmation Hearings (Government and Legal Studies Department).

Awards: Phi Beta Kappa, Sarah and James Bowdoin Scholar, Book Award (earned a 4.0 GPA).

ROSEN BIEN GALVAN & GRUNFELD LLP

Fely Francisco Villadelgado

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: fvilladelgado@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **June 2012 – 2024**
Paralegal

Assist with management of large class action cases, prepare court filings, conduct legal research, draft correspondence, transcribe telephone calls and correspondence and assist attorneys with trial preparation.

Low, Ball & Lynch, San Francisco, California **November 2010 – January 2012**
Legal Secretary

Supported three Associates specializing in civil law, insurance defense, construction, premises liability, public entity, landlord/tenant defenses and personal injury litigation.

Luce, Forward, Hamilton & Scripps LLP, San Francisco, California **June 2007 – June 2008**
Legal Secretary

Supported a Partner specializing in family wealth, exempt organizations and international estate planning. Responsibilities included: editing, revising and finalizing revocable and/or irrevocable trusts, last wills, durable powers of attorney for management of property and personal affairs, certifications of trust, assignments of trust agreements, advance health care directives and authorizations for use and disclosure of protected health information. Also supported an Associate in real estate and environmental litigation. Prior to the above assignments, I supported a Partner specializing in chapter 7 and 11 bankruptcy cases.

Goldberg, Stinnett, Meyers & Davis, San Francisco, California **July 2002 – June 2007**
Legal Secretary

Supported two Partners and an Associate specializing in chapter 7 and 11 bankruptcy cases. Responsibilities included: ECF filing in the Northern and Eastern District; drafting notices; requests for entry of orders, declarations in support thereof, filing proposed orders and certificates of services, filing and serving various pleadings; faxing and photocopying small and large volumes of documents; transcription; editing, revising and distributing pleadings and other documents

Morrison & Foerster, LLP, San Francisco, California **October 2000 – June 2002**
Legal Secretary

Supported three litigation Associates, one of whom did intellectual property litigation. Duties included: transcription; filing and serving various pleadings; arranging travel/seminars for attorneys; faxing, photocopying and scanning documents; processed legal documents (contracts, memorandum,

letters, briefs, charts, etc.), answering telephones; serving documents on opposing counsel and general office duties.

Brown & Wood, San Francisco, California **November 1994 – August 2000**
Legal Secretary

Supported a Senior Associate, Associate and a contract Attorney specializing in corporate securities and public finance.

EDUCATION

University of Santo Tomas, Manila, Philippines	**B.S., Administration**
University of South Dakota	**Various Units**
Control Data Institute	**Word Processor/Secretary**

LANGUAGES

Fluent in Tagalog

ROSEN BIEN GALVAN & GRUNFELD LLP

Hanna N. Wallace

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: HWallace@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **June 2017 – 2019**
Paralegal

Assist with development and management of large class action cases, including preparation of court filings and supporting documents, conducting factual research, and corresponding with class members and governmental entities. Interview class members and potential class members, tour correctional facilities as part of ongoing monitoring of injunctive orders, analyze document productions, and draft portions of compliance reports for attorney review.

Law Offices of James M. Sitkin, Oakland, California **October 2016 – May 2017**
Legal Assistant

Legal assistant for a civil litigation firm specializing in representation of employees in overtime class actions. Assist with legal filings, financial record upkeep, preparing billings, document editing and management, communicating with firm's vendors/suppliers, and other administrative tasks. Learning to execute court filings, format pleadings and discovery, tabulate data, and conduct basic legal research.

Root & Rebound, Oakland, California **June 2016 – August 2016**
Communications and Development Intern

Assisted with the summer fundraising events and initiatives with a budget of +$10,000. Managed volunteers and interns during fundraising events. Managed correspondence, data upkeep, organization, and outreach surrounding fundraising efforts. Assisted with the implementation of development and communications materials including newsletter writing and research for grant applications. Managed and tracked donations, donor and contact databases, and acknowledge-ments. Helped with data and impact analysis from surveys that help the organization better target goals/strategy for incarceration reentry education and advocacy.

m/Oppenheim Associates, San Francisco, California **May 2015 – October 2015**
Research Assistant

Provided support for the Research, and Marketing teams. Edited, finalized, and assembled portfolio packets for clients, did significant external nonprofit research to assist executive searches, led database cleanup projects, and scheduled and coordinated travel/meetings.

Schoolspace, Dublin, Ireland **June 2014 – August 2014**
Marketing Intern

Assisted with administrative work, data analysis projects, marketing strategies, and project assistance. Sat in on meetings with present and potential clients, and often was responsible for final edits of portfolios.

EDUCATION

University of California, Berkeley **B.A., Economics, 2017**

Activities: Research Assistant, Economics Department, September 2016-May 2017; Sage Mentorship Project, January 2014-December 2015; Campaign Manager for ASUC Senate Campaign, January 2015-May 2015.

ROSEN BIEN GALVAN & GRUNFELD LLP

Luke Weitzenberg

101 Mission Street, Sixth Floor
San Francisco, California 94105-1738

T: (415) 433-6830
F: (415) 433-7104
E: lweitzenberg@rbgg.com

EXPERIENCE

Rosen Bien Galvan & Grunfeld LLP, San Francisco, California **2022 – 2023**
Paralegal Clerk

General and complex civil litigation, with an emphasis on civil rights, employment, business, and attorneys' fees cases, at the trial court and appellate levels.

Volunteer Lawyers Project, Portland, Maine **May 2021 – August 2021**
Summer Intern

Reached out to hundreds of clients and performed intakes daily; received numerous letters of gratitude from clients and supervisors. Managed client and case information in Legal Server; initiated implementation of Google Voice to ensure client privacy and efficiency.

Walkup, Melodia, Kelly & Schoenberger **July 2020 – April 2021**
San Francisco, California
Law Clerk

Communicated with clients to collect information needed to receive compensation from PG&E for their role in California wildfires.

Abbey, Weitzenberg, Warren, and Emory **May 2019 – August 2019**
Santa Rosa, California
Summer Intern

Worked with programs such as ProLaw and Excel to organize and file case documents relating to the fire lawsuit against PG&E. Organized case files for trial, coordinated transfer of files from office to the courthouse and assisted with trial logistics.

Bowdoin Orient **Newspaper, Brunswick, Maine** **August 2018 – May 2019**
Staff Reporter

Conducted and transcribed interviews with various staff members and students on the Bowdoin campus (articles available upon request). Wrote in-depth stories under strict time schedules while consistently meeting deadlines.

EDUCATION

Bowdoin College Brunswick, Maine **Bachelor of Arts, History & English, 2022**

Honors: Sarah and James Bowdoin Scholar, Bowdoin Book Scholar

EXHIBIT M

Hon. Wynne S. Carvill (Ret.)
JAMS, Suite 1500
Two Embarcadero Center
San Francisco, CA 94111
c/o gdittmar@jamsadr.com

JAMS ARBITRATION
OIA Arbitration No. 18111; JAMS Ref. No. 1100115944

SMITH, GRACE ELIZABETH,
Claimant,

v.

KAISER FOUNDATION HEALTH PLAN, INC.,
Respondent.

RULING ON ATTORNEY FEES APPLICATION

1. **Parties & Counsel:** The parties to this arbitration and their counsel are -

For Claimant Grace Smith	For Respondent Kaiser Foundation Health Plan, Inc.
Disability Rights Education and Defense Fund Claudia Center, Esq. Silvia Yee, Esq. Erin H. Neff, Esq. 3075 Adeline St., Ste. 210 Berkeley, CA 94703	**Sheppard Mullin Richter & Hampton LLP** Robert J. Guite, Esq. Moe Keshavarzi, Esq. John T. Brooks, Esq. Andrew Dane, Esq. Alexander Kuljis, Esq.

and **Rosen, Bien, Galvan & Grunfeld** Ernest Galvan, Esq. Michael Nunez, Esq. 101 Mission St., 6th Fl. San Francisco, CA 94105	Samuel Brooks, Esq. 333 S. Hope St., 43rd Fl. Los Angeles, CA 90071

2. Arbitrator: On May 22, 2023, the individual identified below was appointed by the Office of Independent Administrator ("OIA") as the sole arbitrator, and initial disclosures were made on May 24, 2023. No objection has been raised.

Hon. Wynne Carvill (Ret.)
JAMS, Suite 1500
Two Embarcadero Center
San Francisco, CA 94111
wcarvill@jamsadr.com

3. Case Manager:

For JAMS	For OIA
Giana Dittmar JAMS, Suite 1400 1925 Century Park East Los Angeles, CA 90067 Tel. 310-309-6202 gdittmar@jamsadr.com	Marcella A. Bell OIA, Suite #A35 635S. Hobart Blvd., Los Angeles, CA 90005 Tel. 213-637-9847 oia@oia-kaiserarb.com

4. Agreement to Arbitrate:

This matter came to arbitration pursuant to a federal court order in *Smith v. Watanabe* (N.D.Cal. #21-CV-07872-HSG)("federal action") compelling arbitration and in accordance with the mandatory arbitration provisions of Claimant's membership agreement with Kaiser as reflected in her Evidence of Coverage document ("EOC"). The latter specifies that any claim that "arises from or related to an alleged violation of any duty incident to or arising out of this EOC or a [Member's] relationship to [Respondent]" shall be submitted to binding arbitration.

5. Applicable Law and Rules:

The OIA Rules for Kaiser Permanente Member Arbitrations (as amended January 1, 2023) ("Rules") and the substantive law of the State of California apply to this arbitration.

6. Claims and Arbitrability:

On or about March 26, 2023, Claimant filed a Demand for Arbitration with the OIA. A Response was filed on or about July 20, 2023. The foregoing claims are arbitrable.

7. Attorney Fees Application:

On September 1, 2024, Kaiser filed a dispositive motion, after which there were various discovery disputes, some discovery, and then an opposition filed on April 8, 2024. Kaiser filed a reply on April 26, 2024, and oral argument occurred on May 1, 2024. On May 15, 2024, the dispositive motion was denied in a ruling that observed that, had there been a cross-motion, it would have been granted on the then-existing record ("May 15th Order"). Subsequently, the parties entered into a stipulated resolution, on which a partial award was issued on July 12, 2024. That award provided Claimant with a monetary recovery sufficient to pay for a motorized wheelchair and physical therapy and required a replacement wheelchair every five years under certain conditions.

The only remaining issue is attorney fees. On August 19th, Claimant filed a request for a total award of $1,584,847.93, which consisted of a $725,921.40 lodestar, a multiplier of 2.0, $103,145.95 for post-May 25th work on fees, and costs of $29,859.18. Kaiser's opposition was filed September 23rd, and a reply on October 7th. As the latter contained new evidence,[1] a sur-reply was allowed after the oral argument on October 11th. The issues are whether Claimant is a prevailing party entitled to fees, the appropriate lodestar, whether a multiplier is warranted or even available, and costs.

A) Prevailing Party Issue

Both Section 1557 of the Affordable Care Act ("ACA") and Section 504 of the Rehabilitation Act provide for prevailing plaintiff fee awards. (*Religious Sisters of Mercy v. Azar* (D.N.D. 2021) 513 F.Supp.3d 1113, 1123, *aff'd* (8th Cir. 2022) 55 F.4th 583; *Armstrong v. Davis* (9th Cir. 2003) 318 F.3d 965, 970.) Claimant argues that she is the prevailing party by securing a court enforceable settlement agreement on the ACA/504 cause of action. (*Richard S. v. Dept. of Developmental Servs*. (9th Cir. 2003) 317 F.3d 1080, 1086, 1088.) Further, while the Unruh Act was not reached in the May 15th Order, she argues that the findings and analysis in that Order would support entry of judgment on that state claim as well, which also provides for prevailing plaintiff fee awards.

Respondent counters that (1) Claimant did not prevail on the ACA/504 claim because there was no cross-motion or a full record to support such a cross-motion, (2) the alternative discretionary grounds based on *Moncharsh v. Heily & Blase* (1992) 3 Cal.4th 1 cannot support a fee award, (3) the stipulated partial award does not find any statutory violation, and (4) Claimant only obtained relief for herself and not the broad, class-wide injunctive relief barring enforcement of Kaiser's $2,000 limit on coverage for wheelchairs, which it is argued was her primary litigation objective as reflected in the Demand's requested relief.

To accept Respondent's first three arguments would mean that Claimant should have rejected the Arbitrator's June 3rd suggestion that the parties accept the May 15th

[1] New evidence may be received in the discretion of the court/arbitrator provided that a sur-reply is permitted. (*Jay v. Mahaffey* (2013) 218 Cal.App.4th 1522, 1538.)

Order on the ACA/504 claim and should have continued to pursue her May 22nd motion for summary adjudication and, if necessary, a full arbitration hearing solely for the purpose of preserving her right to prevailing party fees. That would have been a huge waste of resources for both sides because it was clear from the briefing on the first dispositive motion that Claimant would win on her ACA/504 claim and, if required, on ancillary claims such as the Unruh Act. The effect on Respondent would be an additional six-figure sum added to the fee motion. The undersigned rejects the notion that in settling the matter based on the May 15th Order Claimant in effect forfeited her right to fees.[2] Further, that is clearly not the law: a settlement may support a fee award where it results in the plaintiff or claimant obtaining significant relief. (*See, e.g., Richard S, supra*, 317 F.3d at1087, and cases cited therein; *Graciano v. Robinson Ford Sales, Inc.* (2006) 144 Cal.App.4th 140, 153 [plaintiff prevailing party even though she abandoned effort to obtain public benefit via injunctive relief].)

Moreover, Respondent's position does not square with the language of the Partial Award. While that award did not expressly state any statutory basis, it did state that the stipulated "resolution was determined by the Arbitrator to be a reasonable accommodation under the circumstances of this case." The term "reasonable accommodation" is a concept found in the ACA implementing regulations (*e.g.,* 45 C.F.R. §92.15) and repeatedly cited as a program requirement of Section 504. (*Alexander v. Choate* (1985) 469 U.S. 287, 301.) The May 15th Order specifically relied on *Alexander* and the Ninth Circuit's application of that framework in *Doe v. CVS Pharmacy, Inc*. (9th Cir. 2020) 982 F.3d 1204, and the district court on remand. Thus, the Partial Award did in fact have an explicit statutory basis – namely, the requirement that a disabled person be afforded a reasonable accommodation.

As for the fourth argument, *Richard S* and *Graciano* make it clear that a plaintiff can be a prevailing party even where the settlement affords him or her "significantly less" than the relief initially sought. (*See also Hensley v. Eckerhart* (1983) 461 U.S. 424, 433 [plaintiff prevailing if succeeds "on any significant issue…[and] receives some of the benefit sought in bringing the suit"].) The broader relief sought by Claimant was and remains the objective in the pending federal action, in which the motion to compel this individual plaintiff to arbitration was granted. While there was no injunctive or declaratory relief in this arbitration, had Claimant not settled, the failure to provide a "reasonable accommodation" probably would have supported a facially broader award – e.g., a declaration that Kaiser's policies and procedures failed to provide a reasonable accommodation for members requiring a motorized wheelchair in violation of Section 504 of the Rehabilitation Act and Section 1557 of the ACA. Instead of continuing with her own dispositive motion filed on May 22, 2024, to obtain such a declaration, she accepted a settlement, which fairly may be characterized as a "bellwhether." The

[2] Actually, the risk to Claimant was just the opposite: if she had failed to accept a Kaiser offer to resolve the dispute on the basis of the May 15th Order and continued to litigate the issues to a final award, Kaiser might have argued and the undersigned concluded that post-May 15th fees were not reasonably incurred because the result was available in a Kaiser settlement offer. In light of that risk, it is ironic that Kaiser is using the resolution that saved it further fee exposure to argue that Claimant should be awarded ***no*** fees. ("No good deed goes …")

Disability Rights Education & Defense Fund ("DREDF") has used it in the federal action and in negotiating with various entities.[3] The stipulated award thus has had and will continue to have a broader impact than just her individualized relief. (Center Reply Decl. at ¶¶ 3-5.)

Significantly, *if Claimant had initially just filed an arbitration demand under her membership agreement* – as Respondent maintains she should have – and asserted the ACA/504 and Unruh Act claims to obtain a motorized wheelchair, she would have received the same result and clearly been entitled to fees. (*Religious Sisters*, *supra*; *Armstrong*, *supra*; s*ee also Morales v. Whole Foods Mkt., Inc.* (N.D.Cal. July 31) 2013 WL 3967639 *2 [re Unruh Act].) A final award in that scenario would very likely contain a declaration such as that posited above. She should not lose the right to fees she would have had in a stand-alone arbitration just because she attempted to join others in a class action and was then relegated to an arbitration.[4]

In short, Claimant obtained sufficient relief to entitle her to being viewed as the prevailing party in the arbitration and is statutorily entitled to attorney fees incurred in the arbitration as opposed to the federal action.

B) Lodestar Rates

In the lodestar calculation, one applies reasonable rates in accordance with the prevailing market rates in the relevant community for non-contingent litigation of the same type. (*Ketchum v. Moses* (2011) 24 Cal.4th 1122; *Barjon v. Dalton* (9th Cir. 1997) 132 F.3rd 496.) Claimant was represented by a private firm (Rosen Bien Galvan & Grunfeld LLP ("RBGG")) and a non-profit legal advocacy group (the DREDF). Both sets of Claimant's attorneys submitted claims based on their usual and customary rates or rates that have been allowed on fee petitions by other Bay Area courts and supported by their own declarations and that of two experts (Richard Pearl and Shawna Parks), which relied in part on rate surveys and fee awards by courts in the Bay Area. Respondent

[3] Kaiser sought language that would make the resolution confidential or otherwise limit DREDF's ability to use it as a bellwhether. Those efforts were rejected. One may thus expect this award to lead to numerous individual arbitrations commenced against Kaiser and other health insurers with similar policies by members/insured who need motorized wheelchairs. The respondents in such cases may expect to be required to bear the costs of arbitration and subject to prevailing party fee awards in most instances. Thus, the impact will probably be much broader than Ms. Smith's case. The situation is not unlike that faced by employers who have arbitration clauses that bar class actions but result in mass arbitration filings with a total exposure analogous to a class action but with higher transaction costs. In those situations, the first arbitration award often has a ripple effect through the following ones and is the basis for settling the balance.

[4]The terms of the arbitration provisions in the Kaiser membership agreement stating that each side bears their own fees is irrelevant. An arbitration provision cannot override a statutory right to attorney fees where such a claim is otherwise subject to arbitration. (*Castillo v. CleanNet USA, Inc.* (N.D.Cal. 2018) 358 F.Supp.3d 912, 934-39 (to be enforceable arbitration agreements must afford all types of relief otherwise available); *Scott-Ortiz v. CBRE Inc*. (D. Ariz. 2020) 501 F.Supp.3d 717, 727-28 (interpreting "Except as otherwise required by law").)

countered with its own counsel's declaration and that of an expert (Gerry Knapton), who relied in part on a well-known survey of legal rates – the Wolters Kluwar Real Rate Report ("Wolters Kluwar Report"). The latter categorizes rates in quartiles where the highest rates are those charged by large firms in complex and high value cases. The crux of Respondent's argument is that the relatively small dollar value of Claimant's individual claim did not justify retention of counsel at the higher rate quartiles being sought on this application.

The undersigned rejects the notion that the fee determination in this case should be based on the dollar value of the individual claim. To begin with, there are numerous cases where a fee award far exceeds the value of an individual claim. For example, in various Labor Code cases, a successful employee recovering wages is entitled to fees under Section 1194(a), and it is not uncommon for the fee award to far exceed the amount of unpaid wages.[5] Similar disparities between a plaintiff's recovery and the attorney fee award are found in Song-Beverly Act and other consumer cases. (*See, e.g.*, *Graciano v. Robinson Ford Sales, Inc.* (2006) 144 Cal.App.4th 140, 164 [fees not to be limited to a proportion of the consumer's recovery].) The obvious rationale for the statutory fee provision is to incentivize counsel to take on cases that have very low dollar value for the individual, who would not be able to retain counsel if retention was based on either an hourly rate or contingency fee. (*See, e.g., City of Riverside v. Rivera* (1986) 477 U.S. 576-577 [no proportional limitation in civil rights cases because would seriously undermine congressional intent]; *Blackwell v. Foley* (N.D.Cal. 2010) 724 F.Supp.2d 1068, 1075-1077 [discussing policies supporting full fee awards[6]].) *Blackwell* was an individual disability discrimination case exemplifying an award of fees far in excess of plaintiff's monetary recovery.

Further, here the case was an offshoot of a large class action, and it is understandable that class counsel and the putative class representatives had a strong interest in consistency between the positions in the federal action and the arbitration, as a misstep in one could adversely impact the other. Finally, the issues in this case were by no means simple and required expertise in both the underling statutes and the relevant case law, which as noted in the May 15th Order was conflicting. Given that complexity, it is understandable that Claimant would seek highly qualified counsel with expertise in the subject matter.

---

[5] This reality is one of the reasons in the undersigned's experience as a mediator, employers often settle for an amount far in excess of a realistic assessment of the exposure for unpaid wages: it is the potential attorney fees exposure that drives the settlement. No one in that context argues that the possibility of a modest unpaid wages award means that plaintiff's counsel will not be fully compensated for the effort to take the case through trial. *City of Riverside* and *Blackwell* explain the policy reasons supporting such fee awards.

[6] The purpose of these policies, moreover, is to incentivize *quality* counsel to take on such cases. That is why the standard references "usual and customary rates" *without* the additional qualifier of "for cases of this size." Such a qualifier would be counter to the very rationale for statutory fee awards.

Here the fees for the various counsel were well within the range of rates for counsel of similar seniority and experience as reflected in the supporting declarations, which detail their education, experience, and significant successes. RBGG's senior attorney (Galvan) just recently had his 2023 rate of $1050 approved by the court in *Prison Legal News v. Ryan* (D.Ariz. Mar. 20) 2024 WL 1195548 at *2. DREDF's senior attorney (Center) has 25 years of experience in complex class actions and disability rights litigation. The rates sought here ($1,100 and $995, respectively) are well within the range of $810 to $1,725 that Pearl found for attorneys at or near their level of experience and professional stature and consistent with Parks' experience in the market and the rates for her own disability advocacy group in similar litigation. The rates sought for Yee ($880), Nunez ($800) and Neff ($535) are within the range of rates for their experience level. The rates sought for Arulanantham ($575) and Meyers ($490) are in the low range Pearl identified in the market. The record is simply replete with evidence that the rates sought to be approved are within the prevailing market rates in the relevant community for non-contingent litigation.[7]

In short, based on a review of this record, the quality of the advocacy on both sides, the evidence of prevailing rates in the Bay Area, and the undersigned's own experience in reviewing fee petitions in various contexts as both a trial judge and arbitrator in the Bay Area, these rates are deemed reasonable under applicable standards.[8]

C) Lodestar Hours

The more difficult issue is the appropriate hours attributable to this arbitration, which is an offshoot of a federal class action with some overlapping issues; however, the federal case raised certain unique issues unrelated to the arbitration. The latter, for example, has an organizational plaintiff, which may pose standing issues, and also has a state agency and its director as defendants, which pose Eleventh Amendment issues. None of these are found in the arbitration or relate to the Kaiser claims. It is not easy to sort these differences out in the context of the motion for fees; however, Claimant's counsel have sorted the time they are claiming into six discreet categories, and the parties and their experts have organized their arguments accordingly. That organizational convention is followed below.

---

[7] Defense counsel countered in oral argument with a representation as to his own rate, which is significantly below the rate of Nunez, for example, even though the latter is more junior and significantly less experienced than defense counsel. That may well be true, but it is only one data point and does not show that the ranges discussed by Pearl or shown in the various quartiles of the Wolters Kluwar Report are not "the market." Further, a court or arbitrator is not obligated to consider a lower rate paid to defense counsel. (*Goplin v. BMW of North America, LLC* (2016) 4 Cal.App.5th 462, 474.)

[8] The rates sought to be approved are based on the attorneys' current rates, and yet the work stretches back over time. Given the fact that they were not paid when the work was performed, the use of current rates is an appropriate way to address the delay in payment. (*Prison Legal News v. Schwarzenegger* (9th Cir. 2010) 608 F.3d 446, 454; *Blackwell, supra*, 724 F.Supp.2d at 1078.) The fact that this approach is taken means that the same delay should not be reflected in any multiplier.

1. Case Development: DREDF claims 15.83 hours, and RBGG 91.0 hours.[9] DREDF states it began investigating Kaiser's practices regarding wheelchairs in October 2019, which is about the time Claimant contacted them, and this work continued through the summer of 2020. The work was mostly by an associate (Myers) and consisted of factual investigation and some legal research. RBGG time records indicate an associate started legal research on the case in February 2021. Both the factual inquiries and the legal research of possible claims would have been necessary whether the eventual decision was to file an individual arbitration or a class action.[10] Respondent does not address this work other than to complain that the entries here and elsewhere have redactions that make it difficult to determine what was done. A review of the redactions leads the undersigned to conclude they do not impair the ability of make a judgment as to whether the work is compensable.[11] This category consists of compensable work developing the case regardless of whether it would be initially filed as a class action or arbitration. Note that there are Myers entries referring to phone calls with other attorneys, and yet the latter time is not included in the claim, which evidences the exercise of billing judgment.

Claimant has carried her initial burden of showing compensable work, and it is not rebutted. Thus, RDEDF is awarded $9,552.30 for 15.83 hours and RBGG $57,522.50 for its 91 hours on this category.

2. Complaint /Amended Complaint: DREDF claims 75.61 hours, and RBGG 33.1 hours. This work began in September of 2020 and involved developing the claims and legal theories on which the federal complaint would be based, but also would be the basis for the eventual arbitration demand. The research also encompassed class action issues and the basis for including a state agency in the complaint – both of which would be extraneous to the eventual arbitration. The Galvan Reply Declaration and the Center Declaration make it clear that work on the state agency issues was not included in their time, but the inference is that work on class issues was. It was argued that class action research and drafting was *de minimus*. This may be true, but there should be some further adjustments for the class issues and whatever work may have been done on federal procedural matters and the applicable Local Rules. Undoubtedly, though, the bulk of the work went into framing the substantive federal statutory and pendent state claims that lay at the heart of both the federal case and the arbitration.

---

[9] I use Tables 11 and 15 in Galvan's Reply Declaration, which sought to correct/clarify entries in his original declaration's Exhibit 4.

[10] It is a mystery why Knapton dismisses this entire category. One must ask whether, in his view, the arbitration should have been commenced without any factual investigation or legal research.

[11] For example, the first entry by DREDF reads: "Call with REDACTED and S. Yee re: REDACTED's recent experiences with Kaiser DME denials and appeal." Clearly, this shows factual investigation of Kaiser DME denials, and the redaction of the interviewee's name is irrelevant to the issue of whether the work was related to the arbitration. Kaiser objects that interviews of members other than Claimant are irrelevant; however, a reasonable investigation would include contacting others to see if there was something unique about Claimant's experience.

Claimant has carried her initial burden of showing a significant amount of compensable work, but the hours claimed are adjusted downward by 10%. Thus, RDEDF is awarded $41,789.30 for 68 hours, and RBGG $26,775.00 for 28 hours on this category.

3. Kaiser Motions: DREDF claims $101,771.65 for 189.37 hours, and RBGG $87,760 for 105.5 hours. This category covers the work opposing the motion to compel arbitration and opposing the motion to dismiss. The former was the focus of DREDF, and the latter was RBGG's responsibility. Respondent argues that the motion to dismiss the federal action was unrelated to the arbitration and that Claimant could not credibly dispute she was subject to the arbitration clause. Claimant counters that her Kaiser claims were part of the motion to dismiss, and that competent counsel owed a duty to the client to see if there was a way around the arbitration clause.

With regard to the motion to dismiss, there were other plaintiffs, including an entity plaintiff, and the defendants included a state agency and its director. Thus, plaintiffs would have had to respond to a motion to dismiss even if Kaiser had never been included as a defendant. The motion to dismiss does not become compensable just because Kaiser was added as a defendant, especially where the claims against it were clearly distinct from the Eleventh Amendment issues posed by the state defendants and the focus of the motion to dismiss. As for the motion to compel arbitration, it is patently clear that under controlling Supreme Court decisions giving the broadest possible scope to the FAA, there was no credible argument for avoiding the Kaiser arbitration provision, which has been around for over 50 years and repeatedly upheld. There was certainly no basis for avoiding the reach of the FAA based on some notion of Congressional intent underlying the ACA. (See Sept. 27, 2022, Order of District Court at pp. 4-5 [noting no case supporting such a theory or the other theories advanced to resist arbitration].) Were Claimant a paying client, it is very doubtful the arbitration clause would have been challenged.[12] The more likely scenario would have been to include Claimant as a plaintiff only on the claims against the state agency and its director.

Claimant has not carried her burden of proof that this work is compensable in the arbitration. Her case should have commenced as an arbitration. Thus, RDEDF and RBGG, which claimed a total of 294.87 hours for this work, are awarded no fees for this category.

4. Other Federal Litigation Tasks: DREDF claims 9.84 hours, and RBGG 30.3 hours. Aside from drafting the complaint, there were other tasks related to the federal action such as Rule 26(f) disclosures and a co-counsel agreement. Some of this would clearly be needed for the arbitration (e.g., a counsel agreement) and other work would also overlap with what would be required in an arbitration – for example, Rule 26(f) disclosures are analogous to JAMS Rule 17 disclosures or what would be required in response to initial discovery under the OIA Rules. But not all of the "other" federal litigation tasks would be required in the arbitration or otherwise related thereto.

[12] There is an additional issue of allegedly excessive time spent preparing for oral argument on the motion to compel, but this objection is rendered moot by the ruling on the category as a whole.

Claimant has carried her initial burden of showing a significant amount of compensable work, but the hours are adjusted downward by 50%. Thus, RDEDF is awarded $4,202.90 on 4.9 hours, and RBGG $13,820.00 on 15.1 hours for this category.

5. Arbitration: DREDF claims 195.58 hours, and RBGG 218.2 hours. The arbitration involved numerous contentious discovery disputes and a complex dispositive motion, which itself involved controversies as to whether it was more akin to a motion to dismiss or summary judgment. There were calls between the parties and Arbitrator on many of these issues. Preparing the declarations, including those of two experts, and fully briefing the complex statutory issues justified the effort reflected in the hours. Clearly, all of this work was necessary for Claimant to develop her claims in arbitration, defeat the dispositive motion, and obtain a ruling that might well have supported a cross-motion for summary judgment but for the procedural posture of the case. Respondent's criticism of these fees is unconvincing. It is true that the fees sought are high, but a defendant "cannot litigate tenaciously and then be heard to complain about the time necessarily spent by plaintiff in response." (*City of Riverside, supra,* 477 U.S. at n.11*; see also Camacho v. Schafer* (1987) 193 Cal.App.3d 718, 724.) Here the defense was vigorous, and Claimant's efforts were appropriate.

Claimant has carried her initial burden of showing compensable work, and the defense has not credibly challenged any of the claimed fees. Thus, RDEDF is awarded $166,536.60 for 195.58 hours, and RBGG $190,550.00 for 218.2 hours on this category.

6. Fees Motion: DREDF claims 30.36 hours, and RBGG 91.7 hours through October 4, 2024. A prevailing party is entitled to "fees on fees." (*Hensley, supra,* 461 U.S. at 429.) The fee motion was heavily contested, with expert declarations submitted by each side, including in reply, and detailed billing records were submitted and contested. As with the arbitration itself, given the tenacity of the defense, the fees incurred by Claimant should not be unexpected. (*See City of Riverside*, *supra*.)

Claimant has carried her initial burden of showing compensable work, and the defense has not credibly rebutted that showing. Thus, RDEDF is awarded $46,528.75 for 52.2 hours, and RBGG $138,592.50 for 165.6 hours on this category through October 4th. In addition, they claim $7,500 as an estimate of their additional work through October 7th. This is a reasonable estimate.

The totals for the above six categories come to $268,609.85 for RDEDF and $427,260.00 for RBGG before any multiplier plus $7,500 to be divided between RDEDF and RBGG.

D) Multiplier

Respondent argues that a multiplier is appropriate under the federal statutes only in very rare or unusual circumstances because quality of representation, novelty and complexity of the issues, etc. are captured either in the appropriate hourly rate or total hours. (*Perdue v. Kenny A. ex rel Winn* (2010) 559 U.S. 542, 551-554; *Mangold v.*

California Pub. Utilities Comm. (9th Cir. 1995) 67 F.3d 1470, 1478.) While there could theoretically be other factors that may not be captured by the lodestar, Respondent argues there has not been the requisite evidentiary showing. Claimant counters that this is one of the rare cases where *Perdue* would allow a multiplier, and alternatively there were state law claims for which multipliers are generally appropriate for novel or difficult issues, the contingency risk, the quality of the advocacy, etc.

The stipulation and the underlying May 15th Order were entered based on the ACA/504 claim, and the Unruh Act and other state claims were not reached. Nor were the state claims included in Claimant's own dispositive motion of May 25, 2024, and thus there is no basis in the record for finding, in effect, a *de facto* Unruh Act ruling that might support a multiplier under California law. Accordingly, *Perdue* controls. Given the hours and rates allowed above, the undersigned concludes that a multiplier is not available in this case based on a finding of unusual or rare circumstances within the meaning of *Perdue*. There is certainly no evidentiary basis for such an exception.

E) Costs

After some minor adjustments on the WestLaw costs, Claimant seeks $29,364.42 in costs ($16,273.34 RBGG and $13,091.08 RDEDF). The largest disputed piece of these costs is for expert witness fess. Respondent argues these should be apportioned between the federal case and the arbitration. The apportionment claim is rejected as these experts did submit reports/testimony related to the arbitration. They cannot be "apportioned;" they were considered in their entirety in the arbitration and compensable in full.

Costs of $29,364.42 are awarded.

F) Conclusion

This is *not* a partial award, but based on the foregoing analysis, the undersigned intends to issue a Final Award that (1) recites the original resolution on the merits and (2) awards fees and costs of $703,369.85 and $29,364.42, respectively. Counsel are invited to *immediately* call attention to any typographical or computational error via an Access email because the Final Award will issue shortly.

DATED: October 21, 2024

_____
Wynne S. Carvill

EXHIBIT N

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiffs, v. ACADEMY MORTGAGE CORPORATIONN, Defendants.	Case No. 16-cv-02120-EMC **FILED UNDER SEAL** **ORDER GRANTING IN PART RELATOR'S MOTION FOR FEES** Docket No. 440

I. INTRODUCTION

Presently pending before this Court is Relator, Gwen Thrower's Motion for Attorney's Fees and Expenses. Docket No. 440 ("Mot."). Relator requests an award of $13,706,930.87, for work performed by two law firms in connecting with this *qui tam* action alleging fraudulent practices of certifying residential mortgage loans by the Defendant, Academy Mortgage. *See id.* The request is made pursuant to the False Claims Act's fee-shifting provision, 31 U.S.C. § 3730(d)(2), which governs civil actions for false claims and awards fees to the Relator in instances of settlement. This amount reflects a "lodestar" multiplier of 2.0 for merits work performed by one of Relator's law firms, and also reflects fees in connection with the motion for fees—though the multiplier does not apply to those fees. The litigation ensued in 2016, Docket No. 1, and the case settled in August 2022 for $38,500,00.00, aside from attorney's fees and costs prior to trial but after briefing on motion for summary judgment.

In its motion, Relator seeks the following: (1) merits fees of $12,622,146.70 ($6,203.542.35 (T&S) and $215,062.00 (RBGG)), and a 2.0 enhancement on T&S's fees); (2) $995,346.85 for work on the fee motion; and (3) $89,437.77 for litigation expenses. Mot. at 2-3. In total, Relator seeks $13,706,930.87. *Id.*

In consideration of the parties' briefing, including supplemental briefs filed by the parties, the Court **GRANTS in part and DENIES in part** Relator's request, as modified herein. In total, Relator is awarded: **$8,585,530.20** in attorney's fees, and perhaps interest added to reimbursements for T&S's payments to RBGG—and **$89,437.77** for expenses. The attorney's fees are comprised of $7,798,146.44 for merits work ((T&S) $7,655,431.44 and (RBGG) $142,715) and $787,383.76 for fee motion fees. A summary of reductions is as follows:

Subject	**Reduction**	**Reduction Amount**
	Merits Work Fees	
T&S Hourly Rates	Reduce rates of attorneys: JNT $888 vs. $1200; JF $630 vs. $800; ML $860 vs. $1000; JL $840 vs. $925; CT $437.50 vs. 550. Reduce rates of paralegals from $435 to $325, aside from Sarah Hulbert	**$1,467,949.00** pre-multiplier ($1,449,117.00 (attorneys) + $18,832.00 (paralegals))
RBGG rates	Reduce hourly rates from 2023 market rates to 2017 rate	**$72,347.00** reduction
Specific reductions: email entries	Reduce recovery of four unsupported email entries	**$2,740** pre-multiplier
Reduction for fees in drafting initial complaint	50% reduction on 87.5 hours of drafting initial complaint	**$242,920.75** pre-multiplier
Time spent locating counsel	Eliminate 125.6 hours of redundant work in search for trial counsel.	**$115,400** reduction pre-multiplier
Lodestar multiplier	Reduce from 2.0 to 1.75	
Total fee award: **$7,798,146.44** (T&S: $7,655,431.44 ($4,374,532.25 x 1.75); RBGG $142,715 ($215,062.00 requested - $72,347.00 reduction for hourly rates)).		
	Fee Motion Fees	
RBGG re-reviewing T&S time entries	Reduce hours from the re-reviewing of time entries	**$120,476**/178 hours
Overall reduction	Overall 10% reduction	
Total fee award: **$787,383.76** (($995,346.85 - $120,476) x 0.90).		
Expenses		
Total expenses awarded: **$89,437.77** (no reductions)		

II. FACTUAL AND PROCEDURAL BACKGROUND

A. History of the Case

This suit involves allegations by Gwen Thrower (the "Relator") against Academy Mortgage ("Academy"), a lender that participated in the Federal Housing Administration ("FHA") Direct Endorsement ("DE") program. Docket No. 45 ("FAC") ¶ 23. Academy, as a program participant, is permitted to underwrite and endorse eligible residential mortgages for government insurance. *Id.* ¶ 20. If a borrower defaults, the Department of Housing and Urban Development ("HUD") becomes liable for the loan. *Id.* ¶ 7. Lenders that are part of the DE program can endorse loans for insurance without government review; HUD relies on lender certifications to ensure only eligible loans with acceptable risk are endorsed. ¶¶ 146-50.

The Relator is a former underwriter at Academy and stepped forward to disclose evidence that Academy was engaging in practices that allegedly contravened federal regulations and caused the government to insure unacceptably risky loans. *See id.* Relator pursued the action qui tam action on behalf of the United States pursuant to the False Claims Act ("FCA") 31 U.S.C. § 3730(d). *See generally id.*

In such actions, the United States may intervene if it deems the case worth the cost-benefit analysis. After Relator filed her initial complaint, the Government considered Relator's evidence and declined to intervene in the case. *See* Docket No. 440, Thomas Decl. ¶ 68. In January 2017, Relator informed the Government she would exercise here right to proceed with the case. *Id.* ¶ 72. Thomas & Solomon LLP ("T&S"), the first of Relator's firms, was involved in the case from the outset. *See* Docket No. 1 (initial complaint). Once Relator decided to proceed without the government's involvement, T&S hired RBGG as local counsel in January 2017. Docket No. 440, Rosen Decl. ¶ 5. RBGG was paid by T&S monthly. *Id.*

Thereafter, Academy filed a motion to dismiss the complaint and a motion to transfer the action to the district of Utah. Docket Nos. 23, 27. Relator filed an Amended Complaint in April 2017, expanding the scope of its claims temporally and geographically, setting forth allegations to a more pervasive and systemic fraud. Docket No. 45. In June 2017 Academy again moved to dismiss or transfer. Docket Nos. 50, 48.

In July 2017 the Government moved to dismiss Relator's Amended Complaint arguing that it performed a cost-benefit analysis and determined the case was not worth pursuing. Docket No. 60. The Court denied the Government's motion to dismiss. Docket No. 97. The Court reasoned that the Government failed to meet its burden of demonstrating a valid purpose for dismissing the case and that it failed to fully or adequately investigate the Amended Complaint's allegations. *Id.* at 2. The government filed a notice of appeal of this decision and a motion to stay proceedings before the Court in July and August 2018. Docket Nos. 106, 115. In August the Ninth Circuit issued an Order to Show Cause directing the Government to show why the appeal should not be dismissed for lack of appellate jurisdiction. *See United States v. Academy Mortgage*, No. 18-16408 (9th Cir.) ("Ninth Circuit") Docket No. 8. Academy also filed a motion to certify the Court's order for interlocutory appeal, arguing that it raised complex and "novel" issues relating to certification and promissory fraud theories in the Amended Complaint. Docket No. 134 at 3. During this time, the parties also engaged in discovery. In December 2018 the Ninth Circuit granted the Government's motion to stay proceedings in the district court and to expedite the appeal. Ninth Circuit Docket No. 17. The case remained stayed until August 2020 when the Ninth Circuit dismissed the appeal for lack of jurisdiction. Ninth Circuit Docket No. 62 at 5.

Thereafter, the parties continued engaging in discovery and prepared for both settlement negotiations and trial. In May 2021 Relator engaged an additional firm, Reese Marketos as trial counsel and, according to Relator, to take the lead on remaining discovery. Docket No. 440, Thomas Decl. ¶ 169. The parties briefed and held oral argument on a summary judgment motion in summer of 2022. *See* Docket No. 318.

In August 2022, the parties engaged in mediation before Judge Leonidas Rosen and the parties settled the case for $38,500.000, excluding attorney's fees and costs. *See* Rosen Decl. ¶ 53 (describing settlement); Mot. at 2; Docket No. 117 at 1-5 (Order Denying MTD and to transfer); *see also Academy Mortgage Corporation Agrees to Pay $38.5 Million to Settle False Claims Act Allegations Related to Mortgages Insured by the Federal Housing Administration*, Office of Public Affairs (December 14, 2022), https://www.justice.gov/opa/pr/academy-mortgage-corporation-agrees-pay-385-million-settle-false-claims-act-allegations (describing settlement

terms).

In May 2023, Relator filed its motion for fees that is presently pending before this Court which seeks fees for two of its firms: T&S and RBGG. Docket No. 440. Academy requested supplemental discovery, asking the Court for leave to seek additional information to substantiate the fee request including fee agreements and raw time entries. Docket No. 449. The Court granted that request and ordered supplemental briefing to address any updates to the motion for fees that the parties wanted to set forth per that supplemental discovery. Docket No. 451. Thereafter, Academy raised a discovery dispute as to the scope of supplemental discovery before Magistrate Judge Kim. Docket No. 461. Judge Kim denied Academy's request to compel additional documents—particularly Academy's request for the Relator's firms to produce all raw time entries and associated metadata. Docket No. 467. Academy then moved this Court for relief from that order, Docket No. 469, which this Court denied, Docket No. 471.

B. Motion for Fees and Expenses

In its motion, Relator seeks the following: (1) fees for its merits work in the amount of $12,622,146.70[1] ($12,407,084.70 for T&S ($6,203,542.35 for 7,277.3 hours of work multiplied by a 2.0 lodestar multiplier) and $215,062.00 for RBGG (222.6 hours of work with no multiplier applied); (2) an award of $995,346.85 for fee motion work through August 2023; and (3) $89,437.77 for litigation expenses. Mot. at 2-3. In total, Relator seeks $13,706,930.87.

To support its request, Relator submits a declaration by Richard Pearl who is an attorney that focuses upon cases and appeals involving court-awarded attorney's fees, and who is a preeminent author regarding attorney's fees in California. *See* Docket No. 440-3, Pearl Decl. ¶¶ 5-7 (explaining 98% of his practice involves attorney's fees and that he authored works including *California Attorney Fee Awards* (3d ed. Cal. CEB 2010) and its cumulative annual Supplements for the years 2011 through March 2023). Mr. Pearl analyzed recent hourly rate determinations made by San Francisco Bay Area courts, along with a compilation of attorney fee rates charged in

[1] This amount reflects a reduction of $1,227,950.65 or 16.1% reductions per billing judgment reductions made by the firms, reducing fees associated with duplicative or otherwise unsubstantiated work. *See* Mot. at 21.

the area. Pearl Decl., Ex. B (court determinations); Pearl Decl. Ex. C (list of fee rates). Mr. Pearl also reviewed two reports: the 2021 Real Rate Report by Wolters Kluwer, which is a report of law firm rates and the 2018 Peer Monitor Public Rates Report of Bay Area law firms. Pearl Decl., Ex. D (Wolters Kluwer Real Rate Report); Pearl Decl. Ex. E (Peer Monitor Public Rates). Mr. Pearl's opinion is that, in relation to rates in the area, the hourly rates employed by both firms are reasonable. *See* Pearl Decl. ¶¶ 16-25.

To support its motion, Relator also submits a declaration by Nelson Thomas, partner of T&S attesting to the billing practices of its firm, the necessity of work performed, expertise of its staff, and the general appropriateness of the fee request. *See* Docket No. 440-1, Nelson Decl. Relator also submitted a line-by-line accounting of the work performed in the matter by T&S. Docket No. 440-1, Nelson Decl., Exs. N-P. Relator also submits case expense reports and receipts. Docket No. 440-1, Nelson Decl., Ex. Q-R. Relator also submits the resumes of attorneys in this action. *See* Docket No. 440-1, Nelson Decl., Exs. B-G. Similarly, Jay Rosen, partner at RBGG submitted a comparable declaration and set of exhibits. Docket No. 440-2, Rosen Decl., & Attachment 1, Exs. A-K.

Academy, for its part, submits the declaration of its expert, Grant Stiefel, arguing for a substantially reduced amount of attorney's fees. Docket No. 448-2, Stiefel Decl. Mr. Stiefel is the founder of a legal fee auditing and consulting firm (Litigation Limited) wherein he has provided billing consulting for more than ten years. Stiefel Decl. ¶¶ 1-4. He also regularly acts as an expert witness in federal court fee disputes, including testifying in over one hundred matters regarding attorney fee rates. *Id.* ¶ 5. Mr. Stiefel notes that he testified for both plaintiffs and defendants and employs the same methodology in both instances. *Id.* ¶ 9, Ex. B (list of 120 matters wherein Mr. Steifel has testified). Mr. Stiefel opines that T&S's rates are "extraordinarily high rates for any lawyers, but particularly for attorneys who do not appear to have ever tried a case." *Id.* ¶ 90. Mr. Stiefel rests his opinion on similar reports as those referenced by Mr. Pearl, along with analysis of recent court decisions regarding rates and fees in the area. *See generally id.*

//

//

III. LEGAL STANDARD

In the Ninth Circuit, reasonable attorneys' fees are determined by first calculating the "lodestar." *Jordan v. Multnomah County*, 815 F.2d 1258, 1262 (9th Cir. 1987). "The 'lodestar' is calculated by multiplying the number of hours the prevailing party reasonably expended on the litigation by a reasonable hourly rate." *Morales v. City of San Rafael*, 96 F.3d 359, 363 (9th Cir. 1996) (citation omitted). There is a presumption that the lodestar figure represents a reasonable fee, but "[t]he fee applicant has the burden of producing satisfactory evidence, in addition to the affidavits of its counsel, that the requested rates are in line with those prevailing in the community for similar services of lawyers of reasonably comparable skill and reputation." *Jordan*, 815 F.2d at 1262-63; *see also Camacho v. Bridgeport Fin., Inc.*, 523 F.3d 973, 979-80 (9th Cir. 2008). Additionally, "[t]he fee applicant bears the burden of documenting the appropriate hours expended in the litigation and must submit evidence in support of those hours worked." *See Gates v. Deukmejian*, 987 F.2d 1392, 1397 (9th Cir. 1992) (citation omitted). "The party opposing the fee application has a burden of rebuttal that requires submission of evidence to the district court challenging the accuracy and reasonableness of the hours charged or the facts asserted by the prevailing party . . . ." *Id.* at 1397-98.

In assessing the appropriate fee, Courts consider "some or all of twelve relevant criteria set forth in *Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67 (9th Cir. 1975)." *Carter v. Caleb Brett, LLC*, 757 F.3d 866, 868- 69 (9th Cir. 2014) (citation omitted). The *Kerr* factors are: (1) time and labor required; (2) novelty and difficulty of the questions presented; (3) skill required of the attorneys; (4) attorney's ability to take on other work during the engagement; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations; (8) the amount at stake and the results obtained; (9) the experience, reputation, and ability of the attorneys involved; (10) the desirability of the case; (11) the nature of the relationship with the client; and (12) awards in similar cases. *Id.* at 869 (citation omitted).

//

//

//

IV. DISCUSSION

Relator seeks reasonable attorney's fees and costs pursuant to the fee-shifting provision in the False Claims Act, 31 U.S.C. § 3730(d)(2), which governs civil actions for false claims. This statute contemplates attorney's fees to be awarded in a qui tam action (private suit on behalf of the United States to recovery money fraudulently obtained) such as this action. *Id.* This statute provides:

> If the Government does not proceed with an action under this section, the person bringing the action or settling the claim shall receive an amount which the court decides is reasonable for collecting the civil penalty and damages. The amount shall be not less than 25 percent and not more than 30 percent of the proceeds of the action or settlement and shall be paid out of such proceeds. ***Such person shall also receive an amount for reasonable expenses which the court finds to have been necessarily incurred, plus reasonable attorneys' fees and costs.*** All such expenses, fees, and costs shall be awarded against the defendant.

Id. (emphasis added). This subsection applies because the government did not pursue an action in this matter; rather, Relator Gwen Thrower pursued the suit and prevailed in reaching a settlement with Defendant Academy for 38.5 million dollars. *Academy Mortgage Corporation Agrees to Pay $38.5 Million to Settle False Claims Act Allegations Related to Mortgages Insured by the Federal Housing Administration*, Office of Public Affairs (December 14, 2022), https://www.justice.gov/opa/pr/academy-mortgage-corporation-agrees-pay-385-million-settle-false-claims-act-allegations (describing settlement terms). Just under 27 million will go to the U.S. government and taxpayers. *Id.*

In calculating the lodestar, the fee applicant has the initial burden of producing "evidence that their requested fees are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience and reputation." *Chaudhry v. City of Los Angeles*, 751 F.3d 1096, 1110 (9th Cir. 2014) (internal quotations omitted). If the fee applicant meets this burden, the burden shifts to the defendant to submit evidence showing the fee requested is not reasonable, the defendant must then submit evidence showing the requested fee is unreasonable. *Gates v. Deukmejian*, 987 F.2d 1392, 1397-98 (9th Cir. 1992).

Academy agrees that the Relator is entitled to reasonable attorney's fees and costs. *See*

Opp. at 9 ("Again, Academy does not contest the entitlement to fees as a result of the settlement, the statute makes that clear."). But Academy argues that the amount of fees requested for merits work is unreasonable for several reasons including that the hourly rate sought is too high, the number of hours billed is excessive, and the multiplier sought (2.0) is not appropriate. *See* Opp. at 5-21. Academy also argues that Relator should not be compensated for fees associated with filing its fee award petition because they are facially unreasonable and because Relator incurred excessive fees for failure to negotiate in good faith. *See* Opp. at 21-25.

A. Fees for Merits Work

At the outset, it is important to note that courts afford a level of deference to counsel's judgement as to what they had to do and the time they had to spend to achieve the results in the case. *See Moreno v. City of Sacramento*, 534 F.3d 1106, 1112 (9th Cir. 2008) ("By and large, the court should defer to the winning lawyer's professional judgment as to how much time he was required to spend on the case; after all, he won…."); *Greenpeace, Inc. v. Stewart*, No. 17-35945, 2020 WL 2465321, at *9 (9th Cir. May 12, 2020) (similar). To this end, "determination of fees should not result in a second major litigation." *Perez v. Safety-Kleen Sys., Inc.*, 448 F. App'x 707, 709 n.1 (9th Cir. 2011). While the fee applicant must submit sufficient documentation to meet the burden of establishing entitlement, "trial courts need not, and indeed should not, become green-eye-shade accountants." *Id.* The essential goal is "to do rough justice, not to achieve auditing perfection." *Id.* Though, a district court is still required to review the legitimacy of fees requested, including by imposing "up to a 10 percent—a haircut—based purely on the exercise of discretion without more specific explanation." *Greenpeace*, 2020 WL 2465321, at *9.

The following *Kerr* factors are most relevant to the case and inform the reasoning employed in the remainder of the analysis.[2] First, the time and labor required in the action was

[2] The factors included: (1) time and labor required; (2) novelty and difficulty of the questions presented; (3) skill required of the attorneys; (4) attorney's ability to take on other work during the engagement; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations; (8) the amount at stake and the results obtained; (9) the experience, reputation, and ability of the attorneys involved; (10) the desirability of the case; (11) the nature of the relationship with the client; and (12) awards in similar cases. *Id.* at 869 (citation omitted).

extensive, given that the case spanned over seven years (from 2016 to the present). *See* Docket No. 1. Specifically, the parties engaged in substantial motion practice, including for a motion to dismiss the complaint or transfer by Academy and a motion to dismiss by the Government, an appeal before the Ninth Circuit, and briefing on a motion for summary judgment. This is somewhat undermined because of a stay before this Court that spanned from 2018 to 2020 while an appeal proceeded before the Ninth Circuit, though that appeal also required work by Relator's counsel. As to novelty and difficulty of questions, the case involved some novelty as Academy argued, on appeal that interlocutory review was appropriate on this basis. Additionally, for T&S—but not RBGG—the fee arrangement with relator was contingent, meaning that T&S incurred risk when taking on the case.[3] Likewise, the desirability of the case was low and the risks high at the outset—given that the government opposed the action and actively sought its dismissal. These factors, and additional *Kerr* factors are discussed more in depth below in relation to Academy's specific objections to the fee award.

1. Reasonableness of Rates

"[T]he established standard when determining a reasonable hourly rate is the rate prevailing in the community for similar work performed by attorneys of comparable skill, experience, and reputation." *United States v. $28,000.00 in U.S. Currency*, 802 F.3d 1100, 1106 (9th Cir. 2015) (internal quotation marks omitted); *see also Blum v. Stenson*, 465 U.S. 886, 895 n.11 (1984) ("prevailing market rate" is "normally deemed to be reasonable"). "[T]he relevant community is the forum in which the district court sits." *Camacho v. Bridgeport Fin., Inc.*, 523 F.3d 973, 979 (9th Cir. 2008).

a. Thomas & Solomon LLP ("T&S")

The hourly rates T&S use in their lodestar calculation range from $325/hour to $1,200/hour depending on title and experience of the timekeeper. The rates requested by the Relator, and the proposed modifications by Academy are as follows:

[3] Although T&S was not to be paid absent Relator's recovery, T&S received a separate Contingency Fee, i.e., 40% of Relator's award, which reduces the impact of risk incurred by T&S on this analysis. *See* Docket No. 485-2, Ex. 3 at 1-2, 5

Timekeeper	Position	Class	Rate	Academy Proposal
J. Nelson Thomas	Partner	1993	$1,200	$800
Jonathan Ferris	Partner (Oct 2022-present); Associate (2012-Oct 2022)	2012	$800	$600
Michael Lingle	Partner	2000	$1,000	$750
Jessica Lukasiewicz	Partner	2008	$925	$750
Conor Tallet	Associate	2018	$550	$400
Adam Sanderson	Associate	2018	$550	$400
Adam Sanderson	Law Clerk	N/A	$325	N/A
Sarah Hulbert (SKH)	Lead Paralegal	N/A	$435	$275
Samuel Noto (SJN)	Paralegal	N/A	$325	$275
Jonathan Francisco (JDF)	Paralegal	N/A	$435	$275
MLH	Paralegal	N/A	$435	$275
CSS	Paralegal	N/A	$435	$275
GJS	Paralegal	N/A	$435	$275
MMY	Paralegal	N/A	$325	$275
MAH	Paralegal	N/A	$325	$275
CMM	Paralegal	N/A	$325	$275
AMM	Paralegal	N/A	$325	$275
JEB	Paralegal	N/A	$325	$275

Academy argues: (1) rates are inflated relative to the market and past rates pursued by T&S; (2) fees are not warranted because T&S offers no proof that it actually charges the rates requested; and (3) paralegal rates are inflated as T&S provided insufficient information to support the variation of rates amongst paralegals. Opp. at 6-8.

i. Inflation of Rates

Relators argues that the fees it has requested are reasonable and in line with prevailing market rates. Mot. at 15-16. Academy argues that the rates requested are inflated. Opp. at 6-8.

To support the reasonableness of fees, Mr. Pearl attests that "[i]n my opinion, Relator Counsel's hourly rates and their request for a lodestar enhancement are in line with how the legal marketplace would compensate them for similar services accomplishing similar results." *Id.* ¶ 11. To support this finding, Mr. Pearl prepared a document compiling the recent hourly rate

determinations made by San Francisco Bay Area courts, along with a compilation of attorney fee rates charged in the area. Pearl Decl., Ex. B (court determinations); Pearl Decl. Ex. C (list of fee rates). Mr. Pearl also reviewed two reports: the 2021 Real Rate Report by Wolters Kluwer, which is a report of law firm rates and the 2018 Peer Monitor Public Rates Report of Bay Area law firms. Pearl Decl., Ex. D (Wolters Kluwer Real Rate Report); Pearl Decl. Ex. E (Peer Monitor Public Rates). Mr. Pearl's opinion is that, in relation to rates in the area, the hourly rates employed by both firms are reasonable. *See* Pearl Decl. ¶¶ 16-25.

Academy argues, however, that T&S's rates employed for attorneys—which range from $550 for a fourth-year associates to $1475 for partners is "extraordinarily high" for attorneys in the Northern District of California. Opp. at 5-9. Instead, Academy proposes reduced rates (reflected above).

To support this proposition, Academy's expert, Mr. Stiefel opines that T&S's rates are "extraordinarily high rates for any lawyers, but particularly for attorneys who do not appear to have ever tried a case." *Id.* ¶ 90. Mr. Stiefel explains that for each of the attorneys listed, there is no indication any has tried a case. *Id.* Additionally, Mr. Stiefel states that the requested rates are hundreds of dollars higher than objective rate date for the legal market and two times higher than rates these specific lawyers have previously been awarded in the district for comparable litigation, and four times higher rates lawyers were awarded in nearly identical litigation in other jurisdictions. *Id.*

The rates requested are on the high end of the scale for large firms in the area, though not entirely out of range. According to the Real Rate Report from 2022, upon which experts for both parties rely, the mean for rates of litigation partners in San Francisco was $742. Docket No. 448-2 (Real Rate Report) at 21, 51. The third quartile rate for a litigation partner in San Francisco was $995. *Id.* at 21. The rates requested for partners here are: $800, $925, $1,000, and $1,200. *See* Mot. at 14-15.

Importantly, T&S requested fees in this district two years ago for the same attorneys working on this case that were notably lower. In *Hutto v. Albertsons Companies, Inc.*, Case No. 3:20-cv-07541-MMC (N.D. Cal. 2021), for example, Mr. Thomas requested $740/hour compared

to $1,200/hour—a $460/hour or 62% increase over two years. *See also Sullivan v. Safeway, Inc.*, 3:19-cv-03187-MMC (N.D. Cal. 2021) (similar). With the exception of Michael Lingle and Adam Sanderson, who did not work on the *Hutto* or *Sullivan* litigation, other attorneys working on this case sought similarly lower fees in this district in those cases relative to this case, which overall include increases ranging from 32% to 62%.[4]

The general increase in market rates over the last two years does not account for these increases. In another declaration submitted by the Relator (primarily focused upon the RBGG fees), Sanford J. Rosen, partner at RBGG discussed the increase in national rates in the last three years. Docket No. 440.2, Decl. of S. Rosen at ¶ 38. Mr. Rosen attested that national rates have increased, on the upper end, 5.6% on 2021, 5.9% in 2022, and were expected to increase 7-8% in 2023, for a total of an approximately 19.5% increase from 2021 to 2023—on the high end. *See id.* Relator's expert, Mr. Pearl, estimates an even lower increase, attesting that "over the past four years, San Francisco area rates have risen an average of 4-6% per year," or, 18% on the highest side of the range over three years. *See* Pearl Decl. ¶19. Relator accounts for the discrepancy by stating that Ms. Lukasiewicz "only later learned that the rates she used were substantially below the rates awarded by courts in this District in comparable class action cases." *Id.* But in those cases, T&S (particularly, Ms. Lukasiewicz) repeatedly and extensively attested that, based on the experience and skills of the attorneys in the suit the requested fees were appropriate. *See, e.g.*, Stiefel Decl., Ex W (Lukasiewicz Decl. in *Hutton*) at 5-7. And additionally, she attested that the rates asserted were the "standard hourly rates of each attorney and paralegal involved in the matter," (specifically, those the attorneys whose rates are also at issue in this litigation). *Id.* at 7. And the attestations were made in multiple suits. It is thus difficult to simply disregard these sworn statements now.

Accordingly, some reduction of rates for T&S's lawyers is appropriate. However,

[4] Jessica Lukasiewicz's rate increased from $700/hour to $925/hour now (32% increase); Jonathan Ferris from $525/hour to $800/hour (52% increase); Connor Tallet from $350/hour to $550/hour (57% increase). *Compare Hutto*, No. 3:20-cv-07541-MMC *and Sullivan*, 3:19-cv-03187-MMC *with* Mot. at 14-15.

Academy's proposal is too drastic; it does not even account for year-over-year market increases. Instead, the Court finds it is appropriate to apply the rates T&S sought in 2021, increased by 20% to account for year-over-year inflation. This approach accommodates T&S's delay in payment by accounting for inflation. *Missouri v. Jenkins*, 491 U.S. 274, 282 (1989) (holding that courts have discretion to increase award to compensate for delay in payment).

Timekeeper	**Position**	**Class**	**2021 Rate**	**Rate + 20% increase**
J. Nelson Thomas	Partner	1993	$740	$888 (vs. $1200)
Jonathan Ferris	Partner	2012	$525	$630 (vs. $800)
Michael Lingle	Partner	2000	N/A	$860 (vs. $1000)[5]
Jessica Lukasiewicz	Partner	2008	$700	$840 (vs. $925)
Conor Tallet	Associate	2018	$350	$437.5 (vs. 550)

Additionally, the rate of Jonathan Ferris is to be reduced. Mr. Ferris requests to be compensated as a partner (at a rate of $800/hour), but T&S's filings show that Mr. Ferris was not promoted to partner until after the case settled in August 2022. *See* Thomas Decl. at ¶ 21 ("Mr. Ferris was promoted to partner at Thomas & Solomon LLP in October 2022. Before becoming a partner at the firm, Mr. Ferris was an associate attorney from August 2012 to October 2022."). Mr. Ferris was awarded $525/hour in *Hutto* and *Sullivan* as an associate. Applying the same 20% market increase reflected above, an appropriate rate is $630/hour for Mr. Ferris.

Multiplying these rates by the hours provided to the Court for each attorney, *see* Docket No. 491, the recovery for each lawyer should is as follows:

Timekeeper	**Hours**	**Requested**	**Rate**	**Total at New Rate**	**Reduction**
J. Nelson Thomas	2,558.50	$3,070,200.00	$888	$2,271,948.00	$798,252.00
Jonathan Ferris	2,956.90	$2,365,520	$630	$1,862,847.00	$502,673.00
Michael Lingle	512.80	$512,800.00	$860	$441,008.00	$71,792.00
Jessica Lukasiewicz	74	$68,450.00	$840	$62,160.00	$6,290.00
Conor Tallet	623.2	$342,760	$437.50	$272,650.00	$70,110.00
Total					**$1,449,117.00**

[5] This rate splits the difference between the rate for Nelson Thomas and Jessica Lukasiewicz, as Michael Lingle is in the middle of those two partners in terms of seniority.

ii. Actual Rates or Reasonable Market Rates

Academy also argues that rates sought by T&S should be reduced because they reflect, at most, a reasonable market rate and not actual rates that T&S charges to its clients. *Id.* Specifically, Academy argues that there is no indication that T&S actually charged or that the Relator paid these rates, or that T&S actually charges any clients the rates requested. *Id.* at 6.

On this point, Academy sought supplemental discovery from T&S to discern standard billing rates it charges clients. *See* Docket No. 449, Ex. 1 (Defendant Academy Mortgage Corporation's [Sixth] Set of Document Requests to Relator Gwen Thrower) at 6 (Request No. 51 "Documents sufficient to identify the rates actually charged by Counsel to clients for work performed in the Northern District of California from 2017 to the present." And Request No. 52 "Documents sufficient to identify Counsel's standard billing rates for new clients from 2017 to the present."). In the Responses and Objections, T&S replied: "Thomas & Solomon LLP has not 'actually charged' any clients for work performed in the Northern District of California from 2017 to the present." Docket No. 471, Ex. B (Response to Request for Documents) at 5-6. And further, "Thomas & Solomon LLP does not have 'standard billing rates for new clients from 2017 to the present.' Thomas & Solomon LLP has not filed any cases on a fee-for-service basis since January 1, 2017." *Id.* at 6.

Ninth Circuit precedent does not dictate that a rate must be reduced unless the firm shows it actually billed clients the rates requested. Rather, although the court may consider actually billing rates, *Polee v. Cent. Contra Costa Transit Auth.*, 516 F. Supp. 3d 993, 998 (N.D. Cal. 2021) (citing *White*, 713 F.2d at 461), counsel is not required to submit evidence of "their own actual billing rates," but can rely upon evidence of a reasonable, community standard in supporting request for fees. *White v. City of Richmond*, 713 F.2d 458, 461 (9th Cir. 1983), *disapproved on other grounds by Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 483 U.S. 711, 718 n.4, (1987). *See id.* ("[W]e take judicial notice of the fact that many civil rights practitioners do not bill their clients at an hourly commercial rate.").

That T&S does not submit evidence of rates it actually charges clients affords the Court room to reduce the hourly rates now claimed. *See also Ferguson* v. *County of Los Angeles*, No.

CV 18-6861 DSF (KKX), 2021 WL 3516260, at *7 (C.D. Cal. Jan. 4, 2021).

iii. Paralegal Rates

In regard to paralegals, Academy also argues that the rates should be reduced from $435/hour and $325/hour to $275/hour unilaterally. Opp. at 7.

Timekeeper	**Position**	**Class**	**Rate**	**Academy Proposal**
Sarah Hulbert (SKH)	Lead Paralegal	N/A	$435	$275
Samuel Noto (SJN)	Paralegal	N/A	$325	$275
Jonathan Francisco (JDF)	Paralegal	N/A	$435	$275
MLH	Paralegal	N/A	$435	$275
CSS	Paralegal	N/A	$435	$275
GJS	Paralegal	N/A	$435	$275
MMY	Paralegal	N/A	$325	$275
MAH	Paralegal	N/A	$325	$275
CMM	Paralegal	N/A	$325	$275
AMM	Paralegal	N/A	$325	$275
JEB	Paralegal	N/A	$325	$275

As Academy points out, aside from Sarah Hulbert, which T&S identifies as a lead paralegal, T&S has not submitted sufficient information about the paralegals, such as years of experience, to justify the increase of rates from $325 to $435. *See* Pearl Decl. ¶ 21 (opining that "Relator's paralegal rates ($325-$435) also are in line with these court awards"); *see also* Thomas Decl. ¶¶ 37-40 (providing limited information regarding Jonathan Francisco but omitting information about all other paralegals with the increased rate). Indeed, eight of eleven paralegals are not identified by name in Relator's motion, including three paralegals which are billed at increased rates as Sarah Hulbert, Lead Paralegal (MLH, CSS, GJS). As the specific "skill, experience, and reputation," is necessary in assessing propriety of fees, *see, e.g.*, *United States v. $28,000.00 in U.S. Currency*, 802 F.3d 1100, 1106 (9th Cir. 2015), the Court finds this is not sufficient information to assess if the deviation in paralegal fees is appropriate. Accordingly, aside from Ms. Hulbert, the increased $435 rate is not sufficiently supported.

On the other hand, Academy's argument that the rate should be reduced to $275 for all

paralegals is not meritorious. Recent decisions in the district, even in previous years, find a higher range reasonable. *See, e.g.*, *Planned Parenthood Fed'n of Am., Inc. v. Ctr. for Med. Progress*, 2020 WL 7626410 (N.D. Cal. Dec. 22, 2020) (Orrick, J.) (finding paralegal rates of $390-$405 reasonable). Accordingly, the Court finds the $325 rate appropriate for the paralegals listed aside from Sarah Hulbert, Lead Paralegal, whose position supports the increased $435 rate. *See id.*

This accounts for reductions as follows:

Timekeeper	**Hours**	**Requested**	**Billed at $325 Rate**	**Reduction**
Samuel Noto (SJN)	88.1	$28,632.50	$28,632.5	$0.00
Jonathan Francisco (JDF)	77.8	$33,843.00	$25,285	$8,558.00
MLH	37.3	$16,225.50	$12,122.5	$4,103.00
CSS	35.1	$15,268.50	$11,407.5	$3,861.00
GJS	21	$9,135.00	$6,825	$2,310.00
MMY	28.5	$9,262.50	$9,262.5	$0.00
MAH	28.1	$9,132.50	$9,132.5	$0.00
CMM	26.3	$8,547.50	$8,547.5	$0.00
AMM	23.7	$7,702.50	$7,702.5	$0.00
JEB	21.8	$7,085.00	$7,085	$0.00
Total				**$18,832.00**

b. Rosen Bien Galvan & Grunfeld LLP ("RBGG")

Academy also argues that RBGG's hourly rates are inflated because the firm seeks to be compensated at rates for 2023 for work it performed as local counsel from the inception of the case through 2021 when it withdrew—despite fees for its merits work already having been paid at its lower rates during the litigation. Opp. at 9-10. Academy proposes applying RBGG's 2017 rates to account for the fee award, as reflected in its invoices charged. *Id.* Indeed, the hourly rates Rosen Bien use in their lodestar calculation range from $405/hour to $1,475/hour depending on title and experience of the timekeeper and reflect its 2023 rates. The rates are as follows:

Timekeeper	**Position**	**Class**	**2023 Rate**	**2017 Rate**
Sanford Rosen	Partner	1962	$1,475	$1,000
Van Swearingen	Partner	2008	$875	$575
Lisa Ells	Partner	2005	$925	$650
Michael Freedman	Senior Counsel	2008	$825	$575
Karen Stilber	Senior Paralegal	N/A	$435	$225
Linda Woo	Senior Paralegal	N/A	$435	$225
F. Gail LaPurja	Senior Paralegal	N/A	$405	$225

Relator contends that the 2023 rates are warranted because RBGG charged only the 2017 rates as an exercise of an "extra-generous billing judgment reduction, due to multiple factors." Reply at 5. According to Mr. Rosen, partner of RBGG, its firm chose to apply the 2017 rates for local counsel to T&S, who hired RBGG to act as local counsel and who paid RBGG on a monthly basis because T&S was working on a wholly contingent fee basis. Rosen Reply Decl. (Docket No. 456) ¶ 22. Accordingly, RBGG argues, it should be compensated for the difference due to the delay in payment. *Id.*

Courts have the discretion to compensate for delay in payment. *Missouri v. Jenkins*, 491 U.S. 274, 282 (1989). There, the Court explained that:

> Clearly, compensation received several years after the services were rendered—as it frequently is in complex civil rights litigation—is not equivalent to the same dollar amount received reasonably promptly as the legal services are performed, as would normally be the case with private billings. We agree, therefore, that an appropriate adjustment for delay in payment—whether by the application of current rather than historic hourly rates or otherwise—[may be appropriate].

Id. at 283-84. In other words, applying an increased rate may be appropriate to account for inflation such that attorneys are not being penalized for receiving a payment later in time when, had they received the payment in the year the work was performed, each dollar received would have been worth more. *See id.* And the Ninth Circuit explained that: "attorney's fees are to be based on market rates and such rates are based on the assumption that bills will be paid reasonably promptly; delays in payment thus deprive successful litigants of the market rates." *Anderson v. Director, OWCP*, 91 F.3d 1322 (9th Cir.1996). If courts deem such compensation appropriate, compensation can be done either: "(1) by applying the attorneys' current rates to all hours billed during the course of the litigation; or (2) by using the attorneys' historical rates and adding a prime rate enhancement." *In re: Wash. Pub. Power Sys. Sec. Litig.*, 19 F.3d 1291, 1305 (9th Cir. 1994).

These cases are inapposite with the present circumstance. Specifically, RBGG was paid contemporaneously by T&S as work was performed. In other words, there was no delay in payment.

Instead, the payment made to RBGG by T&S should be treated like any other litigation

cost that T&S incurred during the course of litigation, and T&S should be compensated for the amount it paid to RBGG, not more.

Accordingly, the Court adopts Academy's proposed rates, which compensates T&S for the amounts actually paid to RBGG reflecting 2017 rates —not RBGG's current rates. However, the Court recognizes that due to the passage of time, T&S may not be made whole if it is only reimbursed for the amount it paid out to RBGG in previous years given e.g., inflation. The parties have not specific if and what amount of interest, if any, should be added to these rates if any to compensate T&S for the expense it incurred years ago. The Court finds the below sums are properly awarded to Relator's counsel but leaves open the question of whether interest should be added to this amount.[6]

Timekeeper	**Hours**	**Requested**	**2017 Rate**	**Granted**	**Reduction**
Sanford Rosen	41.9	$61,802.50	$1,000	$41,900	$19,902.50
Van Swearingen	146.0	$127,750.00	$575	$83,950	$43,800.00
Lisa Ells	20.9	$19,332.50	$650	$13,585	$5,747.50
Michael Freedman	0.5	$412.50	$575	$288	$125.00
Karen Stilber	12.3	$5,350.50	$225	$2,768	$2,583.00
Linda Woo	0.3	$130.50	$225	$68	$63.00
F. Gail LaPurja	0.7	$283.50	$225	$158	$126.00

Total reduction: $72,347.00
Total awarded: **$142,715** ($215,062.00 requested - $72,347.00)

2. Lodestar Multiplier

Parties also disagree as to whether Relator's requested lodestar multiplier of 2.0 is appropriate. Relator requests the multiplier be applied only to fees incurred by T&S for merits work, but not for fee motion work or RBGG's work.[7] *See* Mot. at 6, 8, 24-25; Reply at 15. Relator primarily argues a multiplier is appropriate because of the unusual skill of merits counsel and the purportedly extraordinary result of the $38.5 million settlement. *See* Mot. at 19-21; Reply at 15. Academy argues that the bases Relator relies upon for its multiplier have been accounted

[6] Figures below are derived from Docket No. 440-2, Rosen Decl. Attachment 1; Opp. at 9-10.

[7] Academy argues against applying a multiplier for work on the fee award or for RBGG fees. Opp. at 15. But the Relator makes clear it is only requesting the 2.0 multiplier for T&S merits fees. Reply at 15.

for in its hourly rate and that the result it claims is extraordinary is not so. *See* Opp. at 10-14.

Generally, there is a "strong presumption that the lodestar," absent a multiplier, is sufficient. *Chambers v. Whirlpool Corp.*, 980 F.3d 645, 665 (9th Cir. 2020) (quoting *Perdue v. Kenny A. ex rel. Winn,* 559 U.S. 542, 546-52 (2010)). Thus, adjustments are reserved only for "rare and exceptional circumstances." *Chambers*, 980 F.3d at 665. Such rare circumstances include where an attorney engages in superior performance shown to achieve results "more favorable than would have been predicted based on governing law and the available evidence," an upward calculation can be appropriate. *Perdue*, 559 U.S. at 554. However, the Court in *Perdue* made clear that such increases are not warranted where the exceptional result is due to something other than attorney performance, e.g., a particularly sympathetic jury. *Id.* Additionally, the *Perdue* Court explained that the purpose of the multiplier is to account for factors that are not already incorporated into the rates that attorneys charge. *See id.* at 554-55.

In applying *Perdue*, the Ninth Circuit held that bases subsumed in the hourly rate should not be the bases to support a multiplier. *Whirlpool*, 980 F.3d at 665-668. There, the Ninth Circuit explained that "a multiplier may not be awarded based on a factor that is subsumed in the lodestar calculation." *Id.* at 665 (internal quotations omitted). *See also In re Bluetooth*, 654 F.3d at 942 n.7 (many of the *Kerr* factors for determining reasonable attorney's fees are "subsumed within the initial calculation of hours reasonably expended at a reasonable rate") (citation omitted); *Parsons v. Ryan*, 949 F.3d 443, 467 (9th Cir. 2020) ("Any reliance on factors that have been held to be subsumed in the lodestar determination will be considered an abuse of the trial court's discretion.") (citation omitted).

The Court finds that Relator's counsel's work resulted in an exceptional result, warranting an upward multiplier. T&S achieved in an exceptional result in keeping this case alive, notwithstanding the Government's attempts to extinguish it. This was an unexpected and positive result for the Relator. However, the multiplier should be somewhat reduced because T&S's involvement in the case became more limited as the case progressed.

Here, T&S—on behalf of whistleblower Gwen Thrower who was a former underwriter for Academy—secured a $38,500,000 settlement, restoring just under $27,000,000 to the U.S.

Treasury (less $11,511,500 to Gwen Thrower) for an allegedly fraudulent and pervasive scheme of insuring loans that should not have been insured. *See* Rosen Decl. ¶ 53 (describing settlement); Mot. at 2; Docket No. 117 at 1-5 (Order Denying MTD and to transfer); *see also Academy Mortgage Corporation Agrees to Pay $38.5 Million to Settle False Claims Act Allegations Related to Mortgages Insured by the Federal Housing Administration*, Office of Public Affairs (December 14, 2022), https://www.justice.gov/opa/pr/academy-mortgage-corporation-agrees-pay-385-million-settle-false-claims-act-allegations (describing settlement terms). As Academy correctly notes, the recovery amount is in line with a median range of settlements in other False Claims Act recovery cases which vary substantially in amounts. *See* Docket No. 448-1, McElroy Decl., Ex. 13 (list of FCA settlement amounts ranging from $4.1 million to $9.6 billion against Bank of America in a case relating to the 2008 financial crisis).

However, what is clearly distinct about this case is that the Relator prevailed in receiving a settlement, notwithstanding the Government seeking to prevent the case from proceeding. Docket No. 60. Relator thus was not only battling Defendant Academy Mortgage, but also the Government. *See id.* The Government argued that it performed a cost-benefit analysis in pursuing the case, and the case failed that analysis. *Id.* This Court denied the motion to dismiss filed by the Government—and allowed the case to continue, reasoning that the Government's investigation of the claims was arbitrarily limited to just one location and a limited timeframe of an 18-month period. *See* Docket No. 97. The Government described the decision as unprecedent, explaining that "no court had ever permitted the continuation of a qui tam action in the United States' name that the United States sought to end." Reply Brief for United States, Ninth Circuit ECF No. 51 at 2, 2019 WL 4132218. The decision attracted media attention, given the unique issues involved. *See* Thomas Decl. ¶ 146 & Exs. K, L. Academy does not refute Relator's assertion that the suit surviving, which resulted in the settlement here, was if not the first of its kind, very rare.

And the case surviving is directly attributable to T&S's investigative work. Specifically, the narrowness of the Government's investigation, which was the basis for denying the motion to dismiss, was made apparent precisely because of the scope and breadth of the investigation that T&S engaged in in bringing its claims against Academy. T&S engaged in a multi-week

investigation, expanding the scope to assess Academy's policies and practices throughout the country by identifying, locating, and interviewing former employees across the country to see if Relator's experiences were indeed pervasive. *See* Docket No. 440-1, Thomas Decl. ¶¶ 79-91. These efforts included cold calling individuals not only based upon an employee list but by combing through phone numbers to try and locate employees not necessarily listed and by using skip tracing to find individuals with bad phone numbers. *Id.* ¶¶ 85-86. Through extensive interviews T&S found evidence of fraudulent schemes, including pressuring management to make exceptions for government-required conditions on files, allowances to override underwriter's conditions, improper bonus payments, and adverse actions against employees who did not approve loans. *Id.* ¶ 85. Through this, T&S filed an amended complaint alleging a significantly more pervasive and systemic practice of fraudulent loan underwriting than the Government's investigation portrayed. Docket No. 45. Additionally, the legal theories asserted involved fraud requiring that the complaint meet a heightened pleading standard of Fed. R. Civ. P. 9(b), again increasing the hurdle T&S faced in keeping the suit alive.

Accordingly, an upward multiplier is appropriate in this case. *See Perdue*, 559 U.S. at 554 (finding that attorney's performance resulting in more favorable outcomes "than would have been predicted based on governing law and the available evidence" warranting a multiplier); *Espinosa*, 926 F.3d at 657-68, 572 (upward calculation appropriate based in part upon counsel's involvement in achieving settlement).[8]

However, Relator also justifies the multiplier on the basis that T&S worked on this case on a contingency basis; T&S thus should receive an increased fee award multiplier to account for that risk. The parties dispute whether contingency is ever an appropriate factor to consider in awarding

[8] Relator also cites *Kelly v. Wengler*, 822 F.3d 1085, 1093, 1103 (9th Cir. 2016) to support its argument. But that case is distinguishable. There, the Ninth Circuit affirmed multipliers of 2.0 and 1.3 based upon "extraordinary performance yielding extraordinary results," and because the "quality of work that produced these results [was] underrepresented in the hourly fee." *Id.* But fees were being awarded pursuant to the Prison Litigation Reform Act ("PLRA") which caps the reasonable, hourly fee result. *Id.* at 1103. The Ninth Circuit recognized that the "prevailing rates are very unlikely to be as low as the PLRA rate." *Id.* Accordingly-the multiplier was used to correct deflated rates under the PLRA. *Id.* Here, there is no cap on fees or other deflation of fees per the FCA.

an upward multiplier. *See* Docket No. 493 at 3-4 ("[R]isk, like extraordinary results and undesirability, remains a principal factor to set a multiplier."); Docket No. 488 at 2 ("[T]he Supreme Court has concluded that a contingency fee enhancement is 'incompatible' with fee shifting statutes."). Even assuming it is an appropriate factor to consider, an upward multiplier solely to account for the contingency fee arrangement is not compelling in the present suit. As exhibited in a supplemental filing by Academy, T&S entered into a separate agreement with Relator, providing that T&S would be compensated 40% of the settlement fee paid to the Relator, *in addition* to receiving the assignment of Relator's right to recovery attorneys' fees under the False Claims Act as a "Contingency Fee." *See* Docket No. 485-2, Ex. 3 at 1-2, 5.[9] Accordingly, the contingency agreement which serves to supplement T&S' compensation above and beyond the fee award herein (with no offset or credit) serves somewhat as a counterbalance to the risk that T&S incurred.

Additionally, as the suit progressed, T&S took somewhat of a reduced level of involvement. Specifically, T&S conducted only one deposition and attended but did not defend Relator's deposition; that was done by Reese Marketos (a trial-specific firm brought on by T&S and the Relator). *See* Docket No. 440-1, Thomas Decl. ¶ 169. And T&S attorneys did not attend or partake in other depositions including of Relator's designated expert witnesses. *Id.* ¶¶ 170-174. Additionally, though T&S effected the exceptional result achieved in the case by keeping it alive against stacked odds at the outset, T&S does not contest Academy's assertion that T&S was not primarily responsible for negotiating the ultimate settlement resolving the matter. *See* Opp. at 13; Reply at 15. . *See, e.g.*, *United States ex rel. Carranza v. Guaranteed Rate, Inc.*, No. 1:17-cv-637 (MAD/DJS), 2021 U.S. Dist. LEXIS 24997, at *18 (N.D.N.Y. Feb. 10, 2021); (reducing award in part because, while T&S "may have expended a great deal of effort in this case, they did not settle it. The United States Government intervened in the case on April 29, 2020 and settled the

[9] The DOJ reported that the Relator has or will collect $11,511,500 from the settlement. *See* https://www.justice.gov/opa/pr/academy-mortgage-corporation-agrees-pay-385-million-settlefalse-claims-act-allegations. Thus, T&S stands to recover $4,604,600 ($11,511,500 x .4).

case.").[10]

In summation, the Court finds that a multiplier is appropriate, but the full 2.0 multiplier for T&S requested by Relator is not warranted considering all the circumstances. Though T&S achieved an exceptional result and did undertake a substantial litigation risk given the position of the United States, warranting a multiplier, the firm took a lesser role as the suit progressed, was not primarily responsible for negotiating the settlement, and the risk it took was counterbalanced to some extent by the private contingency agreement entitling it to fully 40% of the settlement fee paid to relator (roughly $4 million) in addition to the fee awarded herein (with no offset or credit). Accordingly, to account for T&S's substantial, successful and heroic work that kept this case alive, allowing for the unlikely, positive settlement in Relator's favor—but in consideration of the aforementioned mitigating factors—the Court finds a **1.75 upward multiplier** appropriate, applied only to T&S merits work.

3. Excessive or Duplicative Fees

Academy argues several tasks performed by T&S are excessive or duplicative including: (1) sending and reading emails; (2) time entries for internal conferencing; (3) and that specific projects including search for trial counsel, hours to draft the appeal brief, and reviewing transcripts were excessive; and (4) that T&S billed excessive hours for recycled work product. Opp. at 14-21. Academy also argues that Relator's failure to provide raw data entries warrants a reduction in fees. Docket No. 463 (Academy's First Supplemental Opposition) at 1-4; Docket No. 470 (Academy's Second Supplemental Opposition) at 1-4 (reasserting arguments). Each argument is addressed in turn below.

As explained above, a level of deference is afforded counsel's judgement as to what they had to do and the time they had to spend to achieve the results in the case. *Moreno*, 534 F.3d at

[10] Academy also argues against a multiplier because the Supreme Court, after this case settled, clarified the standard for approving a government's dismissal of a qui tam action under the FCA—making it more favorable to the government. *United States ex rel. Polansky v. Executive Health Res., Inc.*, 216 L. Ed. 2d 370 (U.S. 2022); Opp. at 14. But that only addresses the merits of the case surviving now—not whether T&S engaged in work worthy of a multiplier. If anything, this argument highlights the uncertainty in the law that T&S faced at the time of the decision.

1112; *Greenpeace, Inc.*, 2020 WL 2465321, at *9. Still, there are particular aspects of the fee request that warrant closer analysis, as addressed below.

a. Sending and Reading Emails and Internal Conferencing

Academy takes issue with T&S's time entries for what it describes as a "pattern and practice" of engaging in excessive and duplicative billing for sending and reading "simple emails." Opp. at 15-17. Particularly, T&S takes issue with the fact that, as explained by its expert, of 10,148 line-item billing entries reviewed 49.4%[11] are related to reviewing or sending an email and of those, 90.4% were billed at 0.2 hours or more with an average of 0.27 hours for each. Stiefel Decl. ¶ 34. Additionally, T&S points to particular examples of what they call egregious billing, such as charging 3.2 hours to exchange four emails with Academy regarding a stipulation to adjourn dates for two weeks in the matter. Opp. at 15. To account for these purported errors, Academy's expert proposes a 75% deduction to the time billed for emails. Stiefel Decl. ¶ 98.

Courts recognize that in modern litigation, attorneys regularly rely on email communication to conduct legal work. *See, e.g.*, *Prison Legal News v. Schwarzenegger*, 561 F. Supp. 2d 1095, 1103 (N.D. Cal. 2008); *Ridgeway v. Wal-Mart Stores Inc.*, 269 F Supp 3d 975, 988 (N.D. Cal. 2017). In *Prison Legal News*, Judge Illston considered whether entries billing for email exchanges were impermissibly vague or otherwise unsupported. 561 F. Supp. 2d at 1103. Judge Illston explained that the surrounding language provided additional context and recognized that, "it is not unreasonable to expect that the partner supervising the case would have multiple entries for … emailing with the associates working with him." *Id.* However, in *De Leon v. Ricoh USA, Inc.*, Judge Corley determined "individual attorneys separately billed for reviewing the same email (for the same amount of time)" did not reflect sound billing judgment, as "counsel should make a food faith effort to exclude from a few request hours that are excessive, redundant, or otherwise unnecessary." *De Leon v. Ricoh USA, Inc.*, 2020 WL 1531331, at *16 (N.D. Cal. Mar. 31, 2020).

The findings by courts such as *Prison Legal News* and *Ridgeway* are sound insofar as they

[11] In Academy's opposition it states that this percentage relates to 9,917 time entries reviewed, but its expert used the figure 10,148—which represents time billing entries also including entries removed per judgment reduction by Relator. *Compare* Opp. at 15 *with* Stiefel Decl. ¶ 34.

reflect that emails are a valid and substantive part of case management in today's world. As Relator points out, email exchanges are often the forum wherein substantive legal work is exchanged and replace what would previously have been billed as e.g., drafting or reviewing a legal memorandum or letter. To this end, Relator's expert, Mr. Pearl explains that "managing a complex case with a large team necessarily generates a great deal of email traffic." Pearl Decl. ¶ 36. And the emails are used as a more efficient means to share "critical information, compared to scheduling and holding meetings and phone calls." *Id.* Given this, that a large percentage of time entries appear to have centered around email exchanges does not necessarily indicate that the work involved therein was not compensable.

However, Academy rightfully points to particular entries that reflect unnecessary or redundant billing for email exchanges that reflect the sort of unsound billing judgment described by Judge Illston in *De Leon*. Specifically, the following entries reflect redundancies or excessive billing and are to be reduced from the award: 0.6 hours ($600 before multiplier) billed by three attorneys (two associates and two partners) to J. McElroy on March 29, 2017, reading "Thanks, Jason. Yes, we are planning on amending." Thomas Decl., Ex. M. at 173; 0.6 hours ($600 before multiplier) billed by three attorneys (two partners and on associate) reviewing a May 22, 2017, email from J. McElroy that read "Jon: Please let me know when you have a minute to talk today." *Id.* at 181; 0.9 hours ($900 before multiplier) billed by six attorneys (four partners and two associates) spent reviewing a December 13, 2028, email from J. McElroy that read "Good afternoon: Please find attached a copy of the Proposed Order relating to Defendant's Motion to Compel Rule 45 Subpoena served today in the above captioned matter. The proposed order relates to docket number 157. Best regards, Jason W. McElroy." *Id.* at 228; 0.6 hours ($640 before multiplier) billed by three attorneys (two partners and on associate) reviewing an October 12, 2021, email from J. McElroy that read "All: Please find attached Academy Mortgage Corporation's Second Set of Requests for Admission. Please note that we have encrypted and password-protected the file due to the confidential documents attached as exhibits. I will send the password via separate communication." This results in a reduction of **$2,740** pre-multiplier.

However, Academy's assertion that this represents a "pattern and practice" of inflated

billing regarding emails is not supported. These represent only four examples of errors from close to 10,000 entries that were submitted to the Court, which is a negligible percentage. Thus, an across-the-board reduction of 75% as Academy's expert suggests is not warranted here.

b. Internal Conferencing

Generally, excessive time spent for internal communications or "intra-office conferencing" such as time spent conferring and strategizing should be reduced. *See De Leon*, 2020 U.S. Dist. LEXIS 56285, at *49; *Hernandez v. Taqueria El Grullense*, No. 12-cv-03257, 2014 U.S. Dist. LEXIS 61020, at *33 (N.D. Cal. Apr. 30, 2014). Academy argues that what it describes as excessive time spent conferencing, conferring, meeting, calling, strategizing, commenting, sending/reviewing memos, and other communications. Stiefel Decl. ¶ 24, Ex. D. To support its assertion Mr. Stiefel, Academy's expert, compiled an exhibit identifying the entries that it deems are offensive internal communications. Stiefel Decl., Ex. D. Mr. Stiefel explains that these entries among to 1,856.4 billable hours that should be reduced for reflecting excessive internal communications and conferences amongst T&S attorneys. Stiefel Decl. ¶¶ 24, 33. However, Relator submitted a convincing rebuttal declaration identifying—line by line—errors made in the submission of Mr. Stiefel in its exhibit purporting to identify internal communications. Rosen Reply Decl. ¶¶ 29-33 & Ex. B. Specifically, Mr. Rosen highlighted in yellow each entry of the hundreds of entries listed that either (1) involve external communications; (2) entries lacking indication of any conferring; (3) wherein conferencing is just one of multiple activities in the same description; or (4) entries including in Mr. Stiefel's report that were marked as no-charge based upon billing judgment reductions. *See id.* In reviewing the line-by-line annotations, Mr. Rosen's accounting is reflective of the communications and serves to expose errors in Mr. Stiefel's exhibit. Accordingly, the Court rejects the recommendation by Academy's expert to reduce the internal conferencing fees unilaterally by 75%.

c. Recycled Work Product

Courts also warn against billing for complaints that are drafted that are either boilerplate or nearly identical to other complains. *G & G Closed Circuit Events, LLC v. Hung Ho*, No. 11-CV-03096-LHK, 2012 U.S. Dist. LEXIS 104029, at *6-7 (N.D. Cal. July 25, 2012). Academy argues

that time spent working on Relator's initial complaint and amended should be deemed duplicative or excessive. Opp. at 20-21. In review of Complaints filed by the United States in another case, *United States v. Quicken Loans*, Inc., No. 15-cv-00613, ECF No. 1, ¶¶ 28-97, 99-101 (D.D.C. April 23, 2015) and the initial complaint here, Docket No. 1 ¶¶ 27-91, 115-17, it appears that certain allegations are nearly identical. Relator does not dispute Academy's argument as to this point. *See generally* Reply. Accordingly—a reduction of fees for the 87.5 hours drafting the initial complaint is appropriate. However, as explained in reference to the appropriateness of the multiplier in this case, the amended complaint in this action, Docket No. 45, which withstood the government's motion to dismiss based upon an extensive investigation of Academy's practices cannot likewise be said to be anything close to "boilerplate," particularly given that it resulted in the unprecedented event of the case continuing despite the government's opposition. No reduction is warranted per the drafting of the amended complaint.

d. Specific Projects

Academy also argues that other specific projects do not warrant compensation. Opp. at 19-20. First, Academy argues that the appeal brief drafted before the Ninth Circuit should not have taken 333.2 hours to draft. *Id.* at 20 (citing *Cruz v. Starbucks Corp.*, No. C-10-01868 JCS, 2013 U.S. Dist. LEXIS 79231, at *28 (N.D. Cal. June 5, 2013) (reducing excessive drafting time)). However, Academy bases this argument on the fact that the appeal was ultimately dismissed for an issue raised *sua sponte*, i.e, lack of appellate jurisdiction. Opp. at 20. Yet that outcome was not known to Relator at the time that it filed the appellate brief. As explained in Relator's opening motion, the Relator spent substantial time conducting research and drafting the brief on the merits of the issue that was permitted for review on interlocutory appeal—namely issues as to certification and promissory fraud raised in the amended complaint. *See* Mot. at 9; Docket No. 134 at 3. The Ninth Circuit *also* directed the parties to address jurisdiction, but that does not negate the need to argue on the merits. It would be irresponsible for the Relator to forego addressing the merits and to have opted only to argue about appellate jurisdiction. Accordingly, Academy's contention that "T&S does not explain why this time was justified," is not true. Opp. at 20. This argument is thus rejected.

Next, Academy argues that T&S should not be afforded 125.6 hours in its search for trial counsel. *Id.* at 19. Academy is correct that time spent locating counsel should be reduced or omitted. *See Ferguson*, 2021 U.S. Dist. LEXIS 196302, at *20 (excluding time requested for locating local counsel). Spending over 100 hours finding counsel is excessive; and time spent solely identifying trial counsel should be excluded. *See id.* On the other hand, certain of the identified time entries by Academy do not relate to the search for counsel at all, but involve substantive communications between trial counsel and T&S. *See* Stiefel Decl. ¶ 71 & Ex. O (identifying, e.g., time entries involving "deposition updates" for those that should be excluded). These substantive entries involving trial counsel stand.

Lastly, Academy argues that time spent (69 hours) reviewing transcripts from another case— United States of *America v. Allied Home Mortgage Corporation, et al.*, Case No. 4:12-cv-02676 (S.D. Tex) should be excluded entirely because that is a distinct case not relevant to this one. Opp. at 20 (citing *Skidmore v. Gilbert*, No. 20-cv-06415, 2022 U.S. Dist. LEXIS 180114, at *24 (N.D. Cal. Sep. 30, 2022) (reducing time spent reviewing deposition transcripts in another case as excessive). Relator justifies the time by explaining that the *Allied* case involved the same defense counsel firm as here and because it also involved an FHA mortgage fraud case under the False Claims Act. Reply at 9; Thomas Reply Decl. ¶ 40. To this end, Relator reviewed the transcripts from that trial to "effectively and efficiently identify the types of documents to obtain in discovery to show elements such as scienter and materiality." *Id.* This strategy appears to be sound, given that the two actions overlapped both in terms of counsel litigating the case and in the idiosyncratic subject matter at issue. Accordingly, and in light of the deference afforded to counsel that have obtained a successful outcome in work that is necessary to succeed, *Moreno*, 534 F.3d at 1112, this project is compensable.

e. Raw Data Entries

Academy also argued in its supplemental filings (spurred by post-judgment discovery targeting the fee request), arguing that the fee award should be reduced because Relator did not submit raw data entries. *See* Docket No. 463 (Academy's First Supplemental Opposition) at 1-4; Docket No. 470 (Academy's Second Supplemental Opposition) at 1-4 (reasserting arguments).

Academy argues that the raw data entries are necessary to prove that the time entries were created contemporaneously instead of subsequently reconstructed. However, this Court previously rejected this argument in its order denying Academy's Request for Relief from a Magistrate Judge's decision, citing the attestations of Relator's counsel that the entries were contemporaneous, and lack of evidence presented by Academy to negate the attestations. Docket No. 478 at 2 (explaining that Academy's basis for arguing reconstruction occurred per number of hours spent reviewing time entries is explained by the need for counsel to review and vet time entries across seven years of litigation for numerous timekeepers). The fee award is not to be reduced on this basis.

4. Summary of Fees for Merits Work

Relator seeks the following: (1) merits fees of $12,622,146.70 , based on a merits lodestar of $6,418,604.35(7,277.3 hours (T&S) multiplied by varying hourly rates ($6,203,542.35) and 222.6 hours (RBGG) multiplied by varying hourly rates ($215,062.00)), and a 2.0 multiplier).

The Court finds an appropriate lodestar is $4,735,593 ($6,203,542.35 - $1,467,949.00 reduction for hourly rates of attorneys and paralegals) for merits work, less $2,740 (email entry reductions), $242,920.75 (reduction for redundant work in drafting initial complaint, and $115,400 (time spent locating counsel); this amounts to $4,374,532.25 pre-multiplier. Accounting for the multiplier of 1.75, T&S is to be awarded **$7,655,431.44** ($4,374,532.25 x 1.75) for its merits work. RBGG is to be awarded **$142,715** ($215,062.00 requested - $72,347.00 reduction for hourly rates) and potentially additional interest. This amounts to a total merits fee award of **$7,798,146.44**.

B. Fee Award for Work on Fee Application

The Relator initially sought $737,379.55 for work it performed regarding the fee application ($403,522.88 for T&S and $333,826.68 for RBGG) for 836.8 hours of work performed through May 2023 when the initial motion was filed. Mot. at 23. This incorporates a 19.7% judgment reduction (bringing the total down $181,110.95). *Id.* This work extended to May 2023. *Id.* In a supplemental filing, Relator increased the amount sought, asking for additional fees incurred due to additional work on the fee motion between May 20 and June 16 performed by RBGG in that amount of $111,530.50, relating to the reply brief and other work in connection

with the fee motion. Docket No. 447 ¶ 5. And subsequently, Relator requests an additional $146,436.80 for work performed by RBGG from June 17 through August 13. Docket No. 456 at 14; Rosen Supp. Decl. ¶ 68 & Attachment 1. In total, Relator requests $995,346.85 for work spend on its fee motion for over 1,000 hours of work on the fee motion. Rosen Supp. Decl. (Dkt. 447) Ex. C; Rosen Second Supp. Decl. (Docket No. 456) ¶ 68.

Academy concedes that the Relator is entitled to recover fees for time spent pursuing a motion for attorney's fees and costs under the FCA. Opp. at 21. However, Academy argues that the extent of the fees requested are facially unreasonable, that the fees should be reduced because T&S refused to negotiate in good faith, increasing work to be done, and because the motion contains excessive time spent reviewing time entries. *See* Opp. at 21-22. Academy re-raised these arguments in its supplemental filings (spurred by post-judgment discovery targeting the fee request). *See* Docket No. 463 at 3-4; Docket No. 470 at 3-4. Academy's expert proposes applying a reduction model, which would eliminate tasks such as duplicative work and time vague billing, would allow accreditation for 502.2 hours of work ($267,163.13) relating to the fee motion. Docket No. 448-2 at 99. Relator's position is that the fees are reasonable, necessary for the motion, and that Academy unnecessarily increased the amount of work that its counsel had to spend on its fee motion (not the other way around). Reply at 11-14.

A. Reasonableness

In several cases (cited by Academy) courts in this circuit have found that much fewer hours than 1,000 spent on a fee motion are excessive. *See Dytch v. Lazy Dog Rests., LLC*, No. 16-cv-03358-EDL, 2019 2019 WL 3928752, at *6-8 (N.D. Cal. Aug. 16, 2019) (94.6 claimed hours on motion for fees unreasonable and excessive and reducing to 60.0 hours); *Rodriguez*, 53 F. Supp. 3d at 1284-85 (123.5 hours on motion for fees unreasonable and excessive); *Hernandez v. Spring Charter Inc.*, No. 19-cv-01479-TSH, 2020 U.S. Dist. LEXIS 42395, at *15-16 (N.D. Cal. Mar. 11, 2020) (25 hours on motion for fees unreasonable and excessive); *Rosenfeld v. U.S. Dep't of Justice*, 904 F. Supp. 2d 988, 1008-09 (N.D. Cal. 2012) ($85,570 spent on motion for fees unreasonable and excessive); *Pub. Resource.org v. U.S. Internal Revenue Service*, No 13-cv-02789, 2015 U.S. Dist. LEXIS 175943, at *24-25, (N.D. Cal. Nov. 20, 2015) (58.7 hours on

motion for fees unreasonable and excessive).

But this does not necessarily end the inquiry. In most of those cases, the court found the fees excessive because the filing should have been "straightforward," or "boilerplate" and the fees were not heavily contested, and the litigation was shorter. *See Dytch*, 2019 WL 3928752, at *7 (fee request should have been a "straightforward filing" and only three-year litigation); *Defenbaugh*, 2004 U.S. Dist. LEXIS 16256, at *39-40 (motion was "to a large degree, boilerplate"); *Rosenfeld*, 904 F. Supp. 2d at 1009 (finding similar and employing 20% reduction for the fees on fee); *Pub. Resource.org*, 2015 U.S. Dist. LEXIS 175943, *24-25 (similar). And in *Rodriguez*, the court noted that this particular firm "frequently requests unreasonably high fees" on fee motions and accounted for it in the filing. 53 F. Supp. 3d at 1285.

Here, Relator justifies the time spent on the fee motion, writing that it required a "massive effort." Docket No. 456-1, Pearl Decl. ¶ 74. There are certain aspects of the suit that made the motion more complicated. There were seven years of time records to review, both for legitimacy and to redact privileged information. *Id.* Additionally, Mr. Thomas (partner at T&S) drafted a substantial declaration to explain the history of the case, including "all of its twists and turns," including the interactions between Relator and the government. *Id.* On top of that, it is certainly true that this fee motion has been contested fairly extensively by the parties. *See* Docket Nos. 440, 447-48, 456, 463-65, 470-74 (briefing regarding fee motion). Indeed, the issue of fees was specifically carved out from the settlement agreement, *see* Docket No. 438 (Order Approving Partial Dismissal), indicating to Relator's counsel that this would be a motion that would endure a fight.

Still, these factors do not seem so extreme as to account for the large difference between fees which courts have regularly recognized as reasonable and the 1,000 hours spent here. To this end, Relator does not assert, nor is the Court aware of cases awarding fees for 1,000 hours spent on a motion fee. In one instance, a court approved a request for 600 hours of fee-related work. *United States v. City & Cnty. of San Francisco*, 748 F. Supp. 1416, 1438 (N.D. Cal. 1990), *aff'd in in relevant part Davis v. City & Cnty. of San Francisco*, 976 F.2d 1536 (9th Cir. 1992) (finding that "the total number of hours expended [on the fee motion], just under 600, is quite reasonable

given the vigor with which the City challenged the fee petition."). Relator cites to one additional case, *Wit v. United Behavioral Health*, 578 F.Supp.3d 1060, 1086 (N.D. Cal. Jan. 5, 2022), where in the court compensated the attorneys for 1,279 hours of fee motion work). However, the fee award was subsequently vacated and remanded—though summarily due to non-opposition of the parties. *Wit v. United Behav. Health*, No. 22-15184, 2023 WL 8723695, at *1 (9th Cir. Dec. 15, 2023).

The Court finds it appropriate to apply a discretionary 10% overall "haircut" to the fees-on-fees work. *Moreno v. City of Sacramento*, 534 F.3d 1106, 1112 (9th Cir. 2008) (holding that a district court may apply a 10% haircut on fee award as a matter of general discretion); *see also Greenpeace*, 2020 WL 2465321, at *9 (citing *Moreno*, 534 F.3d at 1112). The fee motion here is certainly more complex than a typical motion, but the over 1,000 hours spent on it is exceeds that spent on other complicated fee motions. *See, e.g.*, *City & Cnty. of San Francisco*, 748 F. Supp. at 1438 (awarding fees for 600 hours of fee motion work).[12]

C. Failure to Negotiate in Good Faith

Academy also argues that T&S refused to negotiate reasonably regarding its fees and held up the negotiations by refusing to provide detailed time records in a timely fashion. Opp. at 22-23. T&S did engage in some stalling. Specifically, T&S declined to provide detailed time records in September 2022 to facilitate fee discussions, though offering to provide general time entries, and provided the records only one week before filing its motion for fees in May 2023. *See* Docket No. 448-1, McElroy Decl., Ex 3 (email from J. Nelson to J. McElroy, September 26, 2022, explaining "In terms of turning the time records, I don't see the need to exchange the records here as we have never done so in the past and have resolved fee disputes with your firm. If it would put an end to the issue, I would consider making an exception and providing the time worked by timekeepers for the general stages of the case.").

However, it does not appear based on the evidence submitted by Academy that Academy

[12] Academy seeks a reduction to 503 hours (reflecting over a 50%) reduction. But such a severe reduction is not appropriate; the litigation here spanned seven years (culminating in 9,000-time entries), was thoroughly vetted by Relator's counsel, and also that the motion was heavily litigated by the parties.

took T&S up on its offer to provide more general time entries, or took a collaborative approach in regard to negotiations, either. *See id.* (repeating only Academy's request to receive detailed time entries when Mr. Nelson offered general time entries to facilitate settlement discussions). And it is doubtful that providing the specific time entries would have impactful upon settlement discussions, particularly given the wide difference between fees Academy thinks are appropriate and those sought by the Relator, along with the numerous arguments Academy has raised to rebut fees in its opposition to the fee award motion. Additionally, Academy, for its part, also made choices that drove up time spent on the fee petition. This includes requesting extensions for the fee hearing, Docket Nos. 445 and 450, seeking supplemental discovery on the fee petition, Docket No. 449, raising a discovery dispute via letter before Magistrate Judge Kim, Docket No. 461 (which Academy also challenged before this Court, Docket No. 469). Relator's counsel, however, is not requesting fees for the time spent on this supplemental discovery and in continuing to defend its fee petition. Accordingly, the Court does not apply an additional reduction on this basis.

D. Time Spent Vetting Entries

Academy also argues that the fee award motion includes excessive fees because the amount of time spent reviewing and preparing documents for the fee request was excessive (approximately 178.9 hours) and because the work was duplicative insofar as RBGG also reviewed and checked T&S's work vetting those fees. Opp. at 23-24.

The Court previously determined in its order denying relief from the Magistrate Judge's decision that the amount of time spent vetting the records in this case appeared appropriate, considering that the entries were associated with seven years of billing records, involved thousands of time entries, and were vetted against emails and documents. Docket No. 478. This was in context of rejecting Academy's argument that the hours necessarily were indicative of reconstructing time entries (as opposed to vetting contemporaneously submitted time entries). However, the Court did not consider whether the time RBGG engaged in reviewing the entries was duplicative or whether the time spent on this task was warranted.

Courts outside of this circuit have explained that lawyers have an "ongoing duty

throughout the litigation to maintain an accurate record of its time[.]" *Elec. Privacy Info. Ctr. v. U.S. Dep't of Homeland Sec.*, 218 F. Supp. 3d 27, 52 (D.D.C. 2016); *see also Perez v. Garcia*, No. 15-20615-CIV, 2016 U.S. Dist. LEXIS 78517, at *16 (S.D. Fla. June 16, 2016) ("Attorneys who anticipate making a fee application must maintain contemporaneous, complete and standardized time records which accurately reflect the work done by each attorney."). In this sense, the contemporaneous billing records could have been maintained throughout litigation and submitted to the Court with little review or additional billing. However, courts in this circuit regularly, and rightfully warn counsel applying for fees to "review all entries" carefully and to "exercise the judgment necessary" to ensure issues such as e.g., overbilling do not take place in submitting fees. *Dusty S. v. Kijakazi*, 2021 WL 9763052, at *3 (E.D. Wash. Sept. 23, 2021). *See also Charlotte J. v. Kijakazi*, No. 2:20-CV-00278-MKD, 2021 WL 9747975, at *2 (E.D. Wash. Sept. 15, 2021) ("Plaintiff's counsel is asked to review all entries and exercise the judgment necessary to ensure overbilling does not occur."). Indeed, it was this review of entries and exercise of judgment that led to a reduction of approximately 19% of Relator's counsel's overall fees. *See* Mot. at 3; Thomas Decl. ¶¶ 211-213; Rosen Decl. ¶¶ 45 & Ex. H, 56-57. Accordingly, it is an appropriate task to review time entries and to vet those entries against emails and documentation, along with entries by other attorneys to ensure the fees requested are appropriate.

On the other hand, it is not clear why T&S had its work regarding its fee records double checked by RBGG. Decl. of N. Thomas at ¶ 191. Relator has not established that this is a necessary practice. And generally, duplicative work is not compensable. *See, e.g.*, *Moreno v. City of Sacramento*, 534 F.3d 1106, 1112 (9th Cir. 2008) (explaining that attorneys producing overlapping work product is duplicative unless redoing the work is necessary, e.g., in updating research to account for additional case law development). Accordingly, the time RBGG spent double-checking the time entries should be omitted from the calculation. This amounts to a reduction of **$120,476** (178 hours).

In summation, the Court imposes a 10% reduction in the fee motion award to account for hours appearing somewhat excessive (over 1,000 hours). Additionally, the Court reduces the fee motion award for duplicative work that RBGG engaged in for reviewing T&S's time entries.

In total, Relator is awarded **$787,383.76** for its fee motion work (($995,346.85[13]]. - $120,476) x 0.90).

V. EXPENSES

Relator also seeks reimbursement for expenses incurred in relation to the case amounting to $89,437.77. Separate from attorney's fees, the FCA provides for payment of litigation expenses, including expert fees, to a prevailing Relator. *See* U.S.C. § 3730(d)(2); *see also United States ex rel. Lindenthal v. Gen. Dynamics Corp.*, 61 F.3d 1402, 1413 (9th Cir. 1995) ("under the FCA, fees, expenses, and costs are three distinct categories"). Relator submits detailed listings of its expenses, *see, e.g.*, Docket No. 440-1, Nelson Decl., Ex. Q-R., and Academy does not oppose the request, *see generally* Opp. Accordingly, the expense costs are granted.

VI. CONCLUSION

For the reasons stated herein, the Court **GRANTS in part and DENIES in part** Relator's motion for fees and expenses as modified by this order. As to merits work, the reductions include: a reduced lodestar multiplier of 1.75; reductions to T&S's hourly rates in accordance with its 2021 submissions in the district, accounting for year-over-year inflation; RBGG hourly rates reduced to reflect 2017 rates as opposed to 2023 rates (but for which a factor may be applied to represent to time value of money lost by T&S which paid RBGG); and reductions to specific projects and line items identified as excessive, duplicative, or otherwise not warranted. As to the fee motion work, the overall hours for fees on fees are excessive and will be reduced by 10%. Further, duplicative work identified by Academy in cross-checking the time entries for this motion by RBGG is omitted from the calculation. Relator's request for expenses is granted. Relator is awarded **$8,585,530.20**, and possible additional interest on the RBGG payments, in attorney's fees and **$89,437.77** for expenses. The parties shall meet and confer to reach an agreement on what interest

[13] The Relator initially sought $737,379.55 for work it performed regarding the fee application. Mot. at 23. In a supplemental filing, Relator increased the amount sought, asking for additional fees incurred due to additional work on the fee motion between May 20 and June 16: $111,530.50, and then again, asked for an an additional $146,436.80 for work performed by RBGG from June 17 through August 13. Docket No. 456 at 14; Rosen Supp. Decl. ¶ 68 & Attachment 1. In total, Relator requests $995,346.85 for work spend on its fee motion. Rosen Supp. Decl. (Dkt. 447) Ex. C; Rosen Second Supp. Decl. (Docket No. 456) ¶ 68.

adjust, if any, should be applied to the RBGG expenses. If the parties cannot reach an agreement, they shall file cross-briefs on the issue no later than June 14, 2024.

The Clerk of Court is directed to file this order provisionally under seal. The parties are directed to submit their proposal as to sealing no later than June 14, 2024. This order disposes of Docket No. 440

IT IS SO ORDERED.

Dated: May 31, 2024

EDWARD M. CHEN
United States District Judge

United States District Court
Northern District of California

EXHIBIT O

Sanford Jay Rosen – Cal Bar No. 062566*
Lisa Ells – Cal. Bar No. 243657*
Amy Xu – Cal. Bar No. 330707*
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
srosen@rbgg.com
lells@rbgg.com
axu@rbgg.com

David J. Bodney – Ariz. Bar No. 006065
Kennison C. Lay – Ariz. Bar No. 037098
BALLARD SPAHR LLP
1 East Washington Street, Suite 2300
Phoenix, Arizona 85004-2555
Telephone: (602) 798-5400
Facsimile: (602) 798-5595
bodneyd@ballardspahr.com
layk@ballardspahr.com

*admitted *pro hac vice*

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

Prison Legal News, a project of the Human Rights Defense Center,

Plaintiff,

v.

Charles L. Ryan, et al.,

Defendants.

Case No. CV-15-2245-PHX-ROS

DECLARATION OF SANFORD JAY ROSEN IN SUPPORT OF PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND EXPENSES

Judge: Roslyn O. Silver

I, Sanford Jay Rosen, declare:

1. I am an attorney duly admitted to practice before this Court. I am a founding partner in the law firm of Rosen Bien Galvan & Grunfeld LLP ("RBGG"), counsel of record for Plaintiff Prison Legal News ("PLN"). I have personal knowledge of the facts set forth herein, and if called as a witness, I could competently so testify. I make this declaration in support of Plaintiff's Motion for Attorneys' Fees and Expenses.

2. This is a First Amendment and due process case. As recited in Paul Wright's Declaration at ¶¶ 10-14, my firm and I have represented and worked with the Plaintiff in twelve other comparable cases, and many other matters, since approximately 2005, and in this matter since approximately March 2015.

3. Considering all the circumstances of the case and as documented in this declaration and the other accompanying papers, I believe this Court should award PLN $2,255,497.65 for counsel's work on the merits in this court and $250,037.55 for work through May 26, 2023 to prepare the attorneys' fee application in this court. *See* **Appendix 1** to Motion (summary chart). As provided by federal fee shifting law, the claim is based on RBGG's and co-counsel's 2023 billing rates in calculating the lodestar. Nothing in this declaration should be construed as constituting a waiver of the attorney-client privilege or work product doctrine protections.

4. After graduating from law school in 1962, I was a law clerk for the Chief Judge of the U.S. Court of Appeals for the Fourth Circuit, a law professor, and a senior attorney at several civil rights organizations before entering private practice in 1976. The first iteration of my firm was a partnership with Thelton Henderson and Joseph Remcho. My present firm is in a manner a descendent of that first iteration.

5. From its formation in 1990, Rosen Bien Galvan & Grunfeld LLP (RBGG) has been a nationally recognized leader in civil rights, employment, consumer, class action and appellate litigation. See our website at www.rbgg.com. Best Lawyers in America places the firm in the first tier nationally in Appellate Practice, and locally in Civil Rights, for 2022 and for many prior years. A copy of my current resume is attached hereto as

Exhibit A. My online resume is at https://rbgg.com/attorneys/partners/sanford-jay-rosen/.

6. I am an experienced trial and appellate lawyer, arbitrator, mediator, and early neutral evaluator. I am on the Northern District's ADR Early Neutral Evaluator and Mediator panels. I am also a testifying expert on attorneys' fees and related matters.

(a) My trial and appellate experience includes a wide variety of civil work for both plaintiffs and defendants, including class actions and some criminal defense work. I have secured numerous judgments and settlements of over a million dollars.

(b) I have presented oral argument in the U.S. Supreme Court in five cases, in the U.S. Courts of Appeals for ten of the Circuits on more than 30 occasions (more than half of which have been in the Ninth Circuit), and before the Supreme Court and Courts of Appeal of California and appellate courts in other states at least 15 times.

(c) I have briefed scores of other matters in the U.S. Supreme Court and other appellate courts, including on behalf of amici curiae in the U.S. Supreme Court, the Ninth, Fourth, and Third Circuits, and the Supreme Court of California.

(d) I have tried numerous cases to bench and jury in federal district courts in California, Colorado, New York, Ohio and Virginia, and in California and Maryland state courts, and to arbitrators and special masters in California, Hawaii and the Commonwealth of the Northern Mariana Islands.

(e) I have presented scores of attorneys' fees applications, argued appeals in 10 or more attorneys' fees matters, and I am frequently retained as an expert in such matters, including as a testifying expert.

RBGG'S AND MY WORK WITH PLN AND HRDC SINCE 2005

7. Starting in 2005, I have represented Plaintiff PLN (and its successor Human Rights Defense Center (HRDC)) in numerous cases in California, Arizona, and Nevada to secure their rights, and those of other publishers whose publications have been banned or censored by prison and jail authorities. The first of these cases is *Prison Legal News v. Schwarzenegger (sub nom. Prison Legal News v. Newsom*), No. C 07-02058 CW (N.D. Cal. 2007) in which a pre-litigation settlement was negotiated in 2006. The Ninth Circuit

upheld the district court's award of attorneys' fees in that case, including the district court's approval of my 2008 rate of $740 per hour. *See Prison Legal News v. Schwarzenegger*, No. C 07-02058 CW, 2008 WL 11411620 (N.D. Cal. Dec. 5, 2008), *aff'd in part, vacated in part, remanded*, 608 F.3d 446 (9th Cir. 2010).

8. I was counsel of record for PLN and several other publisher, distributor, and reporter organizations on an *amicus curiae* brief in *Beard v. Banks,* 548 U.S. 521 (2006). The Supreme Court framed the issue before it as: whether "a Pennsylvania prison policy that 'denies newspapers, magazines, and photo-graphs' to a group of specially dangerous and recalcitrant inmates 'violate[s] the First Amendment.'" Applying *Turner v. Safley*, 482 U.S. 78 (1987), and *Overton v. Bazzetta*, 539 U.S. 126 (2003), the Court reversed the Third Circuit and held that Pennsylvania's policy did not violate the First Amendment, with Justices Stevens and Ginsburg dissenting.

9. Since 2005, my firm and I have represented PLN and HRDC in thirteen lawsuits to enforce its right to send publications to prisoners in prison and jail systems throughout California, including *PLN v. Schwarzenegger* cited in paragraph 7 above. We have represented PLN and HRDC in such cases in the California counties of Ventura, Placer, San Diego, Tulare, Los Angeles, Siskiyou, Tehama, and Napa. The latest such case, *HRDC v. County of Madera* (E.D. Cal. No. 1:23-cv-00332-ADA-HBK), is pending. Of these cases, only Napa County is within the Northern District of California, and billing rates in Napa County are much lower than in San Francisco. Moreover, only in Los Angeles County are billing rates comparable to those in San Francisco. Nevertheless, RBGG has been paid at or based on their San Francisco billing rates in all of these cases. In addition, we represented PLN in *Prison Legal News v. Babeu*, No. CV-11-01761-PHX-GMS (D. Ariz. 2013) (Pinal Cnty. Ariz.), *Prison Legal News v. Corrections Corporation of America*, No. CV09-01831-PHX-ROS (D. Ariz. 2009); and *Prison Legal News v. Cox,* No. 3:00-cv-00346 (D. Nev. 2013), consolidated into *Prison Legal News v. Crawford,* No. 3:00-cv-00373 (D. Nev. 2000), and its associated docket number.

10. In addition to these cases, RBGG and I have represented PLN and HRDC in

a number of California Public Records Act cases. We have also worked with PLN and HRDC in preparing to file additional First Amendment publications access cases and Public Records Act case that have been resolved upon receipt by the relevant public entities of California Tort Claims demands or prelitigation settlement demands. RBGG and I also were lead counsel, with HRDC as co- counsel, in two federal civil rights cases due to prisoner-on-prisoner killings in Saguaro, Arizona, both of which were litigated in the U.S. District Court for the District of Hawaii. Both settled confidentially. *See Estate of Bronson Nunuha v. State of Hawaii*, No. CV12-00147-DKW-RLP (D. Haw. filed 2012), and *Estate of Clifford Medina v. State of Hawaii*, No. CV12-00340-DKW-RLP (D. Haw. filed 2012). Further, over the last eighteen years, RBGG and I have been asked by PLN and HRDC to litigate numerous other cases involving a range of potential legal issues of interest to HRDC and classes of prisoners.

11. In eighteen years of working with PLN and HRDC, I have become familiar with the work and skill of HRDC's in-house lawyers and legal staff. I know them to be highly experienced, efficient and skillful. I also know that the rates that Plaintiff claims for their work in this case are consistent with the rates we have claimed and been awarded for their work, adjusted to 2023 rates, in other cases in other cases in which we worked together. *See Human Rights Defense Center v. County of Napa*, No. 3:20-cv-01296-JCS, 2021 WL 1176640 (N.D. Cal. Mar. 28, 2021) (2020 rates awarded); *Prison Legal News v. Newsom,* No. C 07-02058 CW (N.D. Cal.) (2022 rates paid by CDCR for 2022 monitoring work).

RBGG'S AND MY FIRST AMENDMENT AND PRISON LAW EXPERIENCE

12. RBGG's representation of PLN and HRDC in this and other free speech and due process cases is informed by the firm's and my work as lead counsel in numerous prison and jail conditions class actions in California and other states. At least three of these prison conditions cases have been litigated in the Eastern District of California, and the fourth, against Madera County, is pending. With the exception of the ongoing *Coleman v. Newsom* case, fees for which are prescribed by the Prison Litigation Reform

Act of 1994 (PLRA), we have always been awarded our San Francisco office rates for our work in these cases. The same is true of our many jail conditions cases, all of which involve jails outside of the City and County of San Francisco, except as to the portions of those cases that are subject the PLRA's billing rates limits. When PLRA attorney billing rates apply, we are consistently paid our San Francisco office billing rates for our paralegals' work.

13. My first prison conditions case was *Toussaint v. McCarthy, see, e.g.*, 926 F.2d 800 (9th Cir. 1990), which commenced in the early 1970s. Eventually, I became lead counsel. I first worked with RBGG co-founding partner, Michael Bien, in the next California prison conditions case, *Gates v. Deukmejian*, *see, e.g.*, 987 F.2d 1392 (9th Cir. 1993), starting in 1988. Mr. Bien was lead counsel for psychiatric services issues. I was lead counsel for the HIV-infected subclass, and lead fees counsel. After *Gates* concluded by being merged into the *Coleman v. Newsom* case, I was not counsel in our other such cases, although I have been consulted about them on many occasions and have litigated fees issues as to some of them.

14. My partners have been the lead counsel in RBGG's many other post-*Gates* prison and jail conditions cases. These include, for example, what is now styled *Coleman v. Newsom et al*., 2:90-cv-00520-KJM-DB (E.D. Cal.), in which Ms. Ells and Mr. Bien are co-lead counsel. Mr. Bien also was lead co-counsel in the consolidated proceedings, which included *Coleman*, decided by the Supreme Court of the United States affirming a prison population reduction order entered by a statutory three-judge district court. *Brown v. Plata*, 563 U.S. 493 (2011).

15. RBGG partners continue to be or have been lead or co-lead counsel in prison and jail conditions cases both in California, and in other states, such as Nebraska. *See, e.g., Armstrong v. Brown (sub nom Armstrong v. Newsom)*, No. C 94-2307 (N.D. Cal.); *Hernandez v. County of Monterey,* No. 13-cv-02354-BLF (N.D. Cal. 2013); *Cole v. County of Santa Clara*, No. 16-cv-06594-LHK (N.D. Cal.); *Babu v. Ahern,* No. 18-CV-07677-NC (N.D. Cal. Feb. 7, 2022); *Hedrick v. Grant,* No. 2:76-cv-00162-GEB-EFB (E.D. Cal.).

16. My free speech litigation started while I was teaching at the University of Maryland and served as lead counsel in a successful challenge to Maryland's public employee loyalty oath. *Whitehill v. Elkins,* 389 U.S. 54 (1967). That work has never stopped. While still a law professor, I successfully represented plaintiffs before a statutory three-judge district court in *Williams v. Blount*, 314 F. Supp. 1356 (D.D.C. 1970), in which I represented both the publisher and a distributor. The court enjoined the Postmaster General from banning a publication from the United States mails for lack of due process.

17. My first four (of five) arguments in the Supreme Court of the United States involved First Amendment violations caused by loyalty oaths and encumbrances. In my fourth, *Communist Party of Indiana v. Whitcomb*, 414 U.S. 441 (1974), the Court was unanimous as to the result. For the first time ever, Justice Brennan's decision for the Court applied the same First Amendment standards to invalidate a civil encumbrance on free speech that it had for decades when passing on criminal laws.

18. I have presented oral arguments in the U.S. Courts of Appeals for ten of the Circuits on more than 30 occasions (more than half of which have been in the Ninth Circuit), and before the Supreme Court and Courts of Appeal of California and appellate courts in other states at least 15 times. I have briefed scores of other matters in the U.S. Supreme Court and other appellate courts. In recent years I have been counsel of record for amici in numerous cases in the U.S. Supreme Court and U.S. Courts of Appeals addressing difficult and cutting edge constitutional issues. The most recent such amicus curiae brief was filed at the specific request of the Solicitor General of Colorado.

19. I have tried numerous cases to juries, bench, special masters, and arbitrators in jurisdictions around the country, including San Francisco, California; Denver, Colorado; Arlington, Virginia; New York, New York; Baltimore, Maryland; Cleveland, Ohio; Honolulu and Kauai, Hawaii, and Saipan (the Commonwealth of the Northern Mariana Islands).

20. I have represented numerous public entities and officials in various additional litigation and pre-litigation matters ranging from contract to employment law

matters. These include the Dominican Republic; the Public Utilities Commission of the State of California; the General Counsel of the California Agricultural Relations Board; the East Bay Regional Park District; the County of Contra Costa, California; the Ravenswood City Elementary School District; and the Human Rights Commission of the City and County of San Francisco. I have also been retained on occasion by Bay Area Rapid Transit (BART) to represent supervisory personnel in labor-management matters. Most recently, at the request of the California Civil Rights Department, I have been representing one if its in-house lawyers and a former in-house lawyer in connection with depositions that the principal defendant is attempting to take in *California Civil Rights Dep't v. Activision Blizzard, Inc. et al.*, No. 21ST-CV-26571 (Los Angeles Superior Ct. 2021).

21. I am also active as an arbitrator, mediator, and early neutral evaluator, and have served as a settlement judge pro tem and a special master. I have facilitated resolution of class actions and other complex matters as a mediator and early neutral evaluator. I am a mediator and early neutral evaluator for the United States District Court for the Northern District of California. I have also been an arbitrator selected from the Federal Mediation and Conciliation panel and the American Arbitration Association panel.

MY ATTORNEYS' FEE BACKGROUND

22. I am highly familiar with billing rates for law firms that have a sophisticated practice involving large, complex class-action cases. My law firm and I have handled almost countless fee disputes and claims on behalf of RBGG and of many other firms, as well as many co-counsel, civil rights organizations, and law firms—including many major law firms—arising in such cases. My firm and I have handled numerous appeals of attorneys' fees issues. I have also served as a mediator in resolving cases that have included substantial attorneys' fees components, and I have decided attorneys' fees issues as an arbitrator.

23. My experience in attorneys' fees litigation includes extensive negotiation, legal research and pleadings, evidentiary hearings, oral argument, and appellate work in both state and federal court and in arbitration and special master proceedings. *See, e.g.*,

Gates v. Deukmejian, 987 F.2d 1392 (9th Cir. 1993); *Gates v. Rowland*, 39 F.3d 1439 (9th Cir. 1994); *Gates v. Gomez*, 60 F.3d 525 (9th Cir. 1995); *Gates v. Shinn*, Nos. 95-15402-15403 (unpublished Memorandum dated April 8, 1996); *Holland v. Roeser*, 37 F.3d 501 (9th Cir. 1994); *Rebney v. Wells Fargo Bank*, 232 Cal. App. 3d 1344 (1991); *Davis v. California Department of Corrections*, No. A076411 (Cal. Ct. App. 1st Dist. Oct. 31, 1997). I served as special fees counsel in *Finkelstein v. Bergna*, 805 F. Supp. 1235 (N.D. Cal. 1992). I am currently lead fees counsel in *United States ex rel. Thrower v. Academy Mortgage Corp.* (N.D. Cal. No. 16-CV-02120-EMC).

24. My firm has won or successfully settled several significant additional attorneys' fees cases including: *National Federation of the Blind v. Uber Technologies, Inc.*, No. 14-04086, Doc. 203 (N.D. Cal. Nov. 8, 2019); *Cole v. County of Santa Clara*, No. 16-06594 (N.D. Cal. Mar. 21, 2019); *Hendrick v. Grant*, No. 14-16947 (9th Cir. 2017); *L.H. v. Brown*, 848 F. Supp. 2d 1141 (E.D. Ca. 2011); *Armstrong v. Brown*, 805 F. Supp. 2d 918 (N.D. Cal. 2011); *L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888 (E.D. Cal. 2009); *Prison Legal News v. Schwarzenegger*, 561 F. Supp. 2d 1095 (N.D. Cal. 2008); *Prison Legal News v. Schwarzenegger*, 608 F.3d 446 (9th Cir. 2010); *Armstrong v. Davis*, 318 F.3d 965 (9th Cir. 2003); *Greene v. Dillingham Construction Company*, 101 Cal. App. 4th 418 (2002); *Lucas v. White*, 63 F. Supp. 2d 1047 (N.D. Cal. 1999). In several of these cases I was lead or co-lead fees counsel.

25. My firm and I secured court orders approving our firm's 2020, 2021 and 2022 billing rates in several recent hotly contested cases, in which I have been lead or co-lead on the fees applications. Most recently, I was lead fees counsel in the Ninth Circuit appellate fees proceedings in this case (No. 19-17449), in which the Ninth Circuit Commissioner awarded our full 2022 billing rates for work on the appeal performed from 2019 to 2022, including my rate of $1,350, Ms. Ells' rate of $850, Ms. Xu's rate of $575, and Ms. Silber's rate of $400. In *Andrews v. Equinox Holdings, Inc.*, No. 20-cv-00485-SK, 2021 WL 5275822 (N.D. Cal. Nov. 9, 2021), the court approved my firm's 2021 billing rates for attorneys and paralegals, including my rate of $1,250 per hour and

Ms. Harrold's rate of $425 per hour. *Id.* In *Human Rights Defense Center v. County of Napa*, No. 3:20-cv-01296-JCS, 2021 WL 1176640 (N.D. Cal. Mar. 28, 2021), the court awarded my firm's 2020 rate for work done that year, including my rate of $1,100.

26. I was counsel of record on an *amicus curiae* brief in *Perdue v. Kenny A.*, 559 U.S. 542 (2010), in which the Supreme Court held that in appropriate cases, attorneys for civil rights plaintiffs are entitled to enhancement of their fees for quality of representation and results. I was also counsel of record on an *amicus curiae* brief filed in the Supreme Court in *City of Burlington v. Dague*, 505 U.S. 557 (1992), on behalf of the ACLU, the NAACP Legal Defense Fund, MALDEF, and numerous other pro bono organizations and private law firms. I was lead counsel on an amicus curiae brief in the California Supreme Court in *County of Santa Clara v. Superior Court (Atlantic Richfield)*, 50 Cal. 4th 35 (2010), on behalf of a number of leading legal ethics professors. The case involved the question whether public entities can retain private contingent fee lawyers in public nuisance cases.

27. On numerous occasions, my firm and I have been awarded upward enhancements of our and our client's fees lodestar claims. *See e.g.*, *Andrews v. Equinox Holdings, Inc.*, No. 20-cv-00485-SK, 2021 WL 5275822 at *810 (N.D. Cal. Nov. 9, 2021) (awarding a contingency risk multiplier of 1.3 in an age discrimination case where Plaintiff accepted the offer of judgment); *Waul v. State Farm Ins. Co.*, No. CGC-02-412248 (San Francisco Sup. Ct. 2007) (awarding my firm's and co-counsel's full 2006 rates, plus a 1.5 risk multiplier, in an unfair business practice case involving automobile insurance); *Greene v. Dillingham Construction Company*, 101 Cal. App. 4th 418 (2002) (race harassment case with damages award of $490,000 and fees of over $1.7 million including a 1.5 risk multiplier); *Davis v. California Department of Corrections*, No. A076411 (Cal. App., Oct. 31, 1997) (upholding multimillion dollar fee award, including a 1.25 multiplier under the Unruh Act). Prior to the *Dague* decision referenced above in paragraph 26, I secured 2.0 multipliers in several prison conditions and voting right cases in the Northern and Eastern District Courts of California.

28. I have published numerous articles and lectured frequently in Practicing Law Institute (PLI), California's Continuing Education of the Bar (CEB), ATLA and State Bar of California Labor Section programs and elsewhere on the subject of statutory attorneys' fees, as well as on the subject of establishing and financing of plaintiffs' civil rights practices. In the Spring of 2012, the CEB published its practice guide, "Employment Damages and Remedies," which includes a chapter written by me and RBGG senior counsel Michael Freedman on "Attorney Fees and Costs." We updated that chapter most recently for publication this year.

29. Federal and state courts have recognized me frequently as an expert on attorneys' fees matters, including at least one California Court of Appeal, several United States District Courts in California, Ohio, and Colorado and several California Superior Courts. Several times I have testified through depositions as an attorneys' fees expert. I have testified in court three times—once in a bench trial in the United States District Court in Colorado, once before a Los Angeles Superior Court jury, and once at a bench trial in Alameda County Superior Court—as an expert on attorneys' fees subjects, including reasonable rates, billing practices, and expenditures of time.

30. I have been retained as an expert on attorneys' fees matters both by proponents and opponents of fees claims. For example, on the plaintiffs' side, I testified by declarations in support of class counsel's attorneys' fees in a wage and hour case against Apple that had been litigated for more than seven years, including a jury trial. *Felczer, et al. v. Apple Inc.*, No. 37-2011-00102593-CU-OE-CTL (San Diego CA Superior Court). I also testified by declaration before the EEOC in *Goel v. Robert Wilke Secretary, Dep't of Veterans' Affairs*, EEOC Case No. 560-2017-00302X.

31. On the defendants' side, I was retained as an expert in a real estate dispute resulting in a Ninth Circuit decision in *Stonebrae, L.P. v. Toll Bros.*, No. 08-0221, 2011 WL 1334444, at *8 (N.D. Cal. Apr. 7, 2011), *aff'd*, 521 F. App'x 592 (9th Cir. 2013). I was retained as an expert in *Post Properties, LP v. Post Street Renaissance Partners*, No. 12-640048 (San Francisco Superior Court 2012), and testified by way of a declaration

opposing a fee claim in that wrongful detainer case. I was retained and testified at deposition as an expert in support of a fee claim as damages in a tort case in California's Santa Clara Superior Court, *Gagnard v. Campi Properties Inc.*, No. 10-167727. I was retained to testify at a jury trial on behalf of defendants in San Francisco Superior Court as an expert on quantum meruit fees for a defendant in a legal malpractice matter arising from a law firm's False Claims Act representation. *Packard, Packard & Johnson v. Hinshaw and Culbertson*, No. 16-55441 (San Francisco Superior Court). After my deposition, the case settled before trial.

32. In 2020, I was paid my full $1,100 per hour rate for my expert declarations in support of plaintiffs' attorneys' fees claim in ERISA class actions in *Ramos v. Banner Health, D. Colo.,* No. 15-cv-2556-WJM-NRN, and *Tracey v. Massachusetts Institute of Technology, D. Mass*., No. 16-cv-11620-NMG. This year I was paid my full 2023 hourly rate of $1,475.00 for my expert declaration in *Ford, et al. v. Takeda Pharmaceuticals U.S.A., Inc., et al.*, U.S.D.C., District of Mass., No. 1:21-cv-10090-WGY.

33. In working on my declaration in the three cases referenced in paragraph 32 immediately above, I learned that St. Louis-based Schlichter, Bogard and Denton's national market rates have been approved by multiple courts in a class action settlement of an ERISA case involving the defined contribution plan of another higher education institution. *See Margaret E. Kelly et al. v. The Johns Hopkins University*, No. 16-2835, Doc. 94 at 13 (D. Md. Jan. 28, 2020); *Cassell v. Vanderbilt University*, No. 16-2086, Doc. 174 at 3 (M.D. Tenn. Oct. 22, 2019); *Bell v. Pension Comm. of ATH Holding Co., LLC*, No. 15-02062, 2019 WL 4193376, at *5 (S.D. Ind. Sept. 4, 2019) (approving a national hourly fee rate of up to $1,060 as part of a lodestar cross-check); *Clark v. Duke Univ*., No. 1:16-cv-11620-NMG, 2019 WL 2579201, at *4 (M.D.N.C. June 24, 2019) (approving a national hourly fee rate of up to $1,060 as part of a lodestar cross-check); *Sims v. BB&T* Corp., No. 15-732, 2019 WL 1993519, at *3 (M.D.N.C. May 6, 2019) (approving a national hourly fee rate of up to $1,060 as part of a lodestar cross-check).

34. Continuously since 1976, I have been a senior partner, managing partner, or

sole principal of a small law firm. In these capacities, I have been setting billing rates and practices for more than 48 years. I also frequently employ other law firms to work for my clients, and thereby become familiar with their rates and practices.

35. I constantly familiarize myself with the rates charged and the billing and work practices of lawyers throughout the nation in a number of additional ways: (1) from my own involvement in attorneys' fees litigation and expert consultations and testimony; (2) by representing other attorneys seeking fees; (3) by obtaining declarations from other attorneys regarding market rates, attorneys' fees, billing and work practices; (4) by discovering the rates charged by opposing parties' counsel; (5) by discussing attorneys' fees, billing, and work practices with other attorneys; (6) by reviewing surveys, legal newspapers, reported decisions, and treatises regarding prevailing attorneys' rates, fees, billing and work practices; (7) by reviewing attorneys' fees applications and awards in cases throughout the nation, as well as published and unpublished decisions and orders throughout the nation; (8) by reviewing rates charged by, and billing and work practices of, other firms that my firm has retained or associated with; and (9) by conducting research in my preparation for testimony as an expert.

BILLING RATES HAVE INCREASED DRAMATICALLY IN RECENT YEARS

36. Based on my above-referenced knowledge and experience with trends in attorney fee rates and annual increases, it is particularly important to note the recent year-over-year percentage increases in attorney fee rates across law firms in the United States. These increases have resulted in dramatic increases to attorney rates over recent years.

37. In 2019 and 2020, annual percentage increases in fee rates remained relatively constant at 3.3% and 3.5%. During and after the height of the COVID-19 pandemic, however, rates increased quite dramatically. Reported increases from the top 100 law firms in the country were 5.6% for 2021 and 5.9% in 2022. Reputable authorities and those I personally consider reliable in this area reported at the end of 2022 that the industry could see 7-8% rate hikes for 2023. Accordingly, law firm rates for top law firms in the U.S. have, on average, risen almost twenty percent over the past three years.

RBGG'S 2023 BILLING RATES

38. RBGG's 2023 hourly rates are well within the range of rates for comparable attorneys and paralegals in the San Francisco Bay Area Market and other major metropolitan markets for legal services in comparable cases to this one. These rates are the rates RBGG charges and is paid in many fee-for-service matters. RBGG's rates are consistent with rates charged by and paid to comparable lawyers for comparable work in San Francisco and throughout the United States.

39. My firm's billing rates are charged to and paid by our many clients who pay by the hour on a monthly billing and payment basis.

40. RBGG's 2023 hourly rates for attorneys and other legal professionals who worked on this action are wholly consistent with the market rates charged for current payment by comparable attorneys and legal staff in the San Francisco Bay Area for work comparable to that performed in this case. In fact, RBGG's rates are lower than the rates at many comparable San Francisco Bay Area law firms. RBGG's billing practices are similarly comparable to those of other attorneys and legal staff in the San Francisco Bay Area.

41. In numerous matters, RBGG has been awarded its San Francisco rates by courts in cases filed and litigated outside of San Francisco and the Northern District of California. This includes the Ninth Circuit, which has historically awarded my firm's and my full San Francisco rates in cases that were filed in district courts outside of San Francisco and the Northern District of California, including not only in the appellate portion of this case, but also starting with several decisions in the *Gates* cases, such as *Gates v. Deukmejian*, 987 F.2d 1392 (9th Cir. 1992), and in two cases that arose in the District of Oregon. *See Holland v. Roeser*, 37 F.3d 501 (9th Cir. 1994) (fees order dated February 22, 1995); *Boots v. Bond*, 9th Circuit Nos. 97-35601 and 97-35641 (Fees including Expenses and Costs due to Frivolous Appeal Order dated January 14, 1998).

42. RBGG's rates are the rates we claim in our fee applications in all our fee-shifting cases, and that we bill clients and are paid monthly, regardless of where their

matters are filed or litigated. Over the years, our rates have been accepted consistently by courts in California and in the Northern and Eastern Districts of California, including in the following cases:

(a) *Andrews v. Equinox Holdings, Inc*., Case No. 20-cv-00485-SK, 2021 WL 5275822 (N.D. Cal. Nov. 9, 2021) (Order approving 2021 rates of (1) Partner Sanford Jay Rosen of $1,250 per hour, (2) Partner Ernest Galvan, class of 1997 – $875; (3) Senior Counsel Jenny S. Yelin, class of 2010 – $600; (4) Associate Adrienne Harrold, class of 2018 – $350; (4) Summer Associates Grace Ann Brew and Alexandra Daniels – $300; (5) Paralegal Cate Johnson – $275; and (6) Paralegal Clerk Adam Dean – $240);

(b) *Human Rights Defense Center v. County of Napa*, No. 20-CV-01296-JCS, 2021 WL 1176640 (N.D. Cal. Mar. 28, 2021) (Order approving 2020 rates of Partner Sanford Jay Rosen of $1,100 per hour, Partner Jeffrey L. Bornstein of $950 per hour, Senior Counsel Benjamin Bien-Kahn of $625 per hour, and Senior Paralegal Linda H. Woo of $350 per hour);

(c) *Neutron Holdings Wage and Hour Cases*, San Francisco Superior Ct. Case No. CJC-19-005044 (July 13, 2021 Order granting request for fees and costs as part of PAGA settlement and May 20, 2021 Tentative Ruling finding RBGG's 2021 rates to be "generally consistent with market rates in the Bay Area and rates … awarded in other cases.");

(d) *Armstrong v. Brown*, N.D. Cal. No. 4:94-cv-02307-CW (Stipulated Order Confirming Undisputed Attorneys' Fees and Costs for the First Quarter of 2021), ECF No. 3283 at 2-3;

(e) *Cole et al. v. County of Santa Clara*, N.D. Cal. No. 5:16-cv-06594-LHK (March 21, 2019 Order Granting Final Approval of Class Settlement and Motion For Attorneys' Fees, approving RBGG's 2018 rates including Ms. Ells's rate of $650), ECF No. 86 at 3-4.

(f) *Sunner et al. v. Kenneth R. Turnage II General Contractor, Inc. et al., Alameda Cnty*. Super. Ct. No. RG15772244 (February 15, 2017 Order approving RBGG's

request for fees and costs as part of a class action settlement common fund, as well as an excerpt of court filings showing RBGG's 2017 billing rates);

(g) *Quinby v. ULTA Salon, Cosmetics & Fragrance, Inc*., N.D. Cal. No. CV-15-4099 WHO (Order approving RBGG's request for fees and costs as part of a class action settlement common fund, as well as excerpts of court filings showing RBGG's 2016 billing rates);

(h) *National Federation of the Blind of California et al. v. Uber Technologies*, Inc., N.D. Cal. No. 14-cv-04086-NC (December 6, 2016 Order approving RBGG's 2016 rates, noting that the rates are "reasonable in the San Francisco Bay Area market," and Declaration of Michael W. Bien in Support of Plaintiffs' Motion for Fees and Costs describing RBGG's 2016 rates);

(i) *Hernandez v. Cnty. of Monterey*, N.D. Cal. No. 5:13–cv–02354–PSG (November 9, 2015 Order granting attorneys; fees and expenses, and Declaration of Michael W. Bien explaining RBGG's requested lodestar based on RBGG's 2015 market rates);

(j) *Estate of Prasad v. County of Sutter*, E.D. Cal. No. 2:12-cv-00592-TLN-JFM (July 17, 2013 Order finding the 2013 rate of $445 for former RBGG associate Kathryn G. Mantoan, who graduated from law school in 2005, reasonable);

(k) *Armstrong v. Brown*, 805 F. Supp. 2d 918, 922 (N.D. Cal. 2011) (compelling defendants to pay RBGG's "reasonable 2010 hourly rates");

(l) *Valdivia v. Brown*, 848 F. Supp. 2d 1141, 1143-44 (E.D. Cal. 2011) (granting motion to compel payment of fees at RBGG's 2010 rates of $275 to $800 per hour, given finding that these rates are "are in line with prevailing rates charged by other San Francisco Bay Area attorneys of comparable experience working on similarly complex cases");

(m) *Prison Legal News v. Schwarzenegger*, No. C 07-02058 CW, 2008 WL 11411620 (N.D. Cal. Dec. 5, 2008), *aff'd in part, vacated in part, remanded*, 608 F.3d 446 (9th Cir. 2010) (affirming RBGG's requested 2008 rates, including my 2008 rate of $740 per hour); and

(n) *L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888, 894-95 (E.D. Cal. 2009) (awarding full requested hourly rates of $295 to $640 for RBGG attorneys "based on consideration of the 2008 market rates and the skill of the individual attorneys").

RBGG'S BILLING PRACTICES AND WORK TO PREPARE THIS FEE APPLICATION

43. I am familiar with RBGG's billing and timekeeping practices. Our billing practices, including our billing judgment reductions, in this case are consistent with both our firm's and the San Francisco Bay Area market's practices. The expenses we are claiming are expenses that are reimbursed to attorneys by their clients in the San Francisco Bay Area.

44. Timekeepers at our firm are required to make a record of the work they do at or near the time the work is done recorded by tenths of an hour, and to either personally enter that information into the firm's timekeeping software or to direct a staff member to do so. The firm's timekeeping software maintains these records in the regular course of RBGG's business, and making these records is a regular practice of RBGG in furtherance of law practice and matter billing.

45. To track our efforts on this matter we had a specific matter number in our firm, 979-19, solely devoted to our work on the merits of the district court portion of this case. We separately tracked our time spent working on the instant fees application in matter number 979-19A. Time recorded in each matter was kept contemporaneously.

46. For logistical reasons, in this Application we are limiting the presentation of Plaintiff's claim for fees to the fees work performed through May 26, 2023. We will supplement and document additional time beyond May 26, if and as appropriate with any reply or at such other time as the Court may direct.

47. I am serving as lead counsel on the fees portion of this matter given Ms. Ells's other case commitments and my extensive expertise in this area, plus my role serving as lead counsel on the appellate fees proceedings in the Ninth Circuit. I am familiar with the skill and experience of all the timekeepers at RBGG who worked on this

matter. I conducted the first and principal review of RBGG's time records largely in 2019, because Ms. Ells was fully engaged in other time sensitive matters, and I was available to do that work. As we would for any client, including clients who are paying fees for services based on periodic bills, we have reduced my $1,475 billing rate for this work in the above time period to Ms. Ells's billing rate of $925.

48. I first vetted our time records to make appropriate billing judgment reductions and to assure that our time records presented to the Court do not disclose attorney client, attorney work product, or any other confidential information. Ms. Ells then personally reviewed the records and made additional reductions. Ms. Ells and I carefully reviewed our time entries and reduced the fees claim to account for any possible inefficiency or unnecessary duplication of effort. It is plain from my review of RBGG's time records that on occasion at least, its lawyers were putting in so much time on this matter that other matters had to be delayed.

49. We have applied liberal billing judgment reductions of the time we actually spent on the merits of the district court proceedings in this matter to eliminate any arguably non-compensable merits work fees. As shown on the time records, we have written off the time of all timekeepers who billed less than 10 hours over the course of the case. We have also written down some unnecessary or unduly duplicative time, and to account for any new associate transition work to come up to speed and any work not involving the common core of facts and law in this case that may have been devoted to issues on which Plaintiff did not prevail. For instance, we have written down all time spent briefing Plaintiff's post-remand request for additional injunctive relief, on which PLN did not prevail. We also eliminated any entries for work by our paralegal that was purely administrative in nature. Furthermore, we are making an across-the-board reduction of 10% as a billing judgment to account for any other unnecessary or unduly duplicative time.

50. These billing judgment reductions do not include additional reductions not shown on the time sheets. During this litigation, the primary timekeepers sometimes did not record their time reviewing and responding to emails or for meetings related to the case

on days when they were engrossed in major case projects. Moreover, we removed entries that were incorrectly entered because they belong to other RBGG accounts, entries that inadvertently duplicated a timekeeper's other entries, and entries that disclosed privileged information that could not be appropriately redacted. We are claiming no compensation for any such time.

51. Attached to this Declaration as **Exhibit B** is a true and correct copy of RBGG's billing records for the merits work as described herein. The records were recorded, reviewed by me and Ms. Ells, and prepared in the same manner as recited above.

52. Attached to this Declaration as **Exhibit C** is a summary chart of RBGG's merits work in the district court. The summary chart identifies all of RBGG's timekeepers in this case, their titles, 2023 rates, billed hours and dollar amounts, and the hours and dollar amounts that were written down. RBGG applied liberal discrete billing judgment reductions of approximately $247,007.50 or approximately14% of the pre-reduced merits work lodestar in the district court. Additionally, RBGG made a 10% across-the-board reduction that comes to $157,035.60. In total, RBGG is claiming $1,413,320.40 for merits work in the district court.

53. We separately tracked our time spent working on the instant fees application in matter number 979-19A. Attached to this Declaration as **Exhibit D** is a true and correct copy of RBGG's billing records for the fees work through May 26, 2023 as described herein. The records were recorded, reviewed by me and Ms. Ells, and prepared in the same manner as recited above. As described in paragraphs 43-50 above, time recorded in each matter was kept contemporaneously and subjected to the same kinds of review and discrete billing judgment reductions as were made for our merits fees claim.

54. Attached to this Declaration as **Exhibit E** is a summary chart of RBGG's work through May 26, 2023 devoted to the fee motion. The summary chart identifies all of RBGG's timekeepers who worked on the fee petition, their titles, 2023 rates, billed hours and dollar amounts, and the hours and dollar amounts that were written down. RBGG applied liberal discrete billing judgment reductions of approximately $18,832.50 or

approximately 8% of the pre-reduced fees motion work through May 26, 2023. Additionally, RBGG made a 10% across-the-board reduction that comes to $21,271.80. In total, RBGG is claiming $191,446.20 for work on the fees petition in the district court.

55. Attached to this Declaration as **Exhibit F** is itemization and documentation of the expenses expended in litigating both the merits and fees application in the district court. These expenses total $13,626.36 and are detailed in **Exhibit F**. Our statutory costs are the subject of the Cost Bill that is being filed with the fees motion.

56. Attached as **Appendix 1** to the Motion is a summary chart of the attorneys' fees and expenses claimed by RBGG, HRDC, and Ballard Spahr. Plaintiff seeks a total of $2,523,914.00 in attorneys' fees and expenses, which are not included on the Cost Bill that is being separately filed.

COMPLIANCE WITH LOCAL RULE 54.2(d)(1)

57. We have complied fully with Local Rule 54.2(d)(1), as detailed more fully in **Appendix 2** to the Motion, which is the Statement of Consultation. I and Ms. Ells sought to meet and confer with Defendants in an attempt to resolve Plaintiff's fees claim prior to filing this Motion, but received no response to our final attempt to schedule a personal meet and confer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct, and that this declaration is executed at San Francisco, California this 5th day of June 2023.

Sanford Jay Rosen

EXHIBIT C

PLN v. Ryan

ROSEN BIEN GALVAN & GRUNFELD LLP MERITS FEES

Timekeeper	Position	Class	2023 Rates	Billed Hours	Billed Amount	Write Down Hours	Write Down Value
Sanford Jay Rosen (SJR)	Partner	1962	$1,475	72.1	$106,347.50	55.9	$82,452.50
Michael W. Bien (MWB)	Partner	1980	$1,525	0.0	$0.00	1.3	$1,982.50
Ernest Galvan (EG)	Partner	1997	$1,050	8.3	$8,715.00	2.3	$2,415.00
Lisa Ells (LAE)	Partner	2005	$925	530.5	$490,712.50	50.5	$46,712.50
Jenny S. Yelin (JSY)	Partner	2010	$825	49.8	$41,085.00	7.8	$6,435.00
Krista Stone-Manista	Associate	2009	$800	154.1	$123,280.00	34.2	$27,360.00
Benjamin Bien-Kahn (BBK)	Senior Counsel	2009	$800	0.0	$0.00	0.2	$160.00
Caroline E. Jackson (CEJ)	Senior Counsel	2011	$750	43.2	$32,400.00	2.3	$1,725.00
Blake Thompson (BT)	Associate	2007	$750	0.0	$0.00	0.9	$675.00
Jennifer L. Stark (JLS)	Associate	2009	$725	0.0	$0.00	1.8	$1,305.00
Jessica L. Winter (JLW)	Associate	2013	$675	0.0	$0.00	1.5	$1,012.50
Andrew G. Spore (AGS)	Associate	2015	$625	1064.1	$665,062.50	23.6	$14,750.00
Amy Xu (AX)	Associate	2015	$625	88.5	$55,312.50	46.0	$28,750.00
Christopher D. Hu (CDH)	Associate	2013	$600	0.0	$0.00	2.3	$1,380.00
Mark Shinn Krantz (MSK)	Associate	2016	$600	0.0	$0.00	0.2	$120.00
Alex Gourse (AG)	Associate	2017	$550	0.0	$0.00	3.3	$1,815.00
Karen Stilber (KES)	Paralegal		$435	27.1	$11,788.50	16.9	$7,351.50
Linda H. Woo (LHW)	Paralegal		$435	0.0	$0.00	0.7	$304.50
F. Gail LaPurja (FGL)	Paralegal		$405	0.0	$0.00	5.8	$2,349.00
Katherine C. Hamilton (KCH)	Paralegal		$325	109.7	$35,652.50	51.8	$16,835.00
Dylan Verner-Crist (DVC)	Paralegal		$325	0.0	$0.00	3.0	$975.00
Patrick M. Cano (PMC)	Law Clek		$285	0.0	$0.00	0.5	$142.50
RBGG MERITS FEES SUBTOTAL:				**2147.4**	**$1,570,356.00**	**312.8**	**$247,007.50**
Additional 10% Discount After Discrete Billing Judgments:					**$157,035.60**		
RBGG CLAIMED MERITS FEES:					**$1,413,320.40**		

EXHIBIT P

MARGOT MENDELSON – 268583
PATRICK BOOTH – 328783
JACOB J. HUTT*
PRISON LAW OFFICE
1917 Fifth Street
Berkeley, California 94710-1916
Telephone: (510) 280-2621
Facsimile: (510) 280-2704

MICHAEL W. BIEN – 096891
GAY C. GRUNFELD – 121944
PENNY GODBOLD – 226925
MICHAEL FREEDMAN – 262850
ROSEN BIEN
GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
Telephone: (415) 433-6830
Facsimile: (415) 433-7104

CLAUDIA CENTER – 158255
DISABILITY RIGHTS EDUCATION &
DEFENSE FUND, INC.
3075 Adeline Street, Suite 201
Berkeley, California 94703
Telephone: (510) 644-2555
Facsimile: (510) 841-8645

* Admitted *pro hac vice*

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JOHN ARMSTRONG, et al.,

Plaintiffs,

v.

GAVIN NEWSOM, et al.,

Defendants.

Case No. C94 2307 CW

~~[PROPOSED]~~ STIPULATED ORDER CONFIRMING UNDISPUTED ATTORNEYS' FEES AND COSTS FOR THE FIRST QUARTER OF 2025

Judge: Hon. Claudia Wilken

On March 26, 1997, the District Court established procedures by which Plaintiffs are to collect periodic attorneys' fees and costs in this case in connection with their work monitoring Defendants' compliance with the Court's Orders and collecting fees.

Pursuant to these procedures, on April 18, 2025, Plaintiffs served on Defendants their First Quarterly Statement for 2025 by electronic transmission. The parties completed their meet-and-confer process on May 13, 2025 as to the fees and costs incurred on all matters.

As a result of the May 13, 2025 agreement, the parties agree to the following:

The parties agree to the payment of $2,567,122.10 to resolve all fees and costs incurred during the First Quarter of 2025, for monitoring and/or litigation activities in the California Department of Corrections of Rehabilitation Division of Adult Operations and Adult Programs (CDCR AOAP) portion of the case. Attached hereto as **Exhibit A** are charts setting forth the fees and costs claimed by Plaintiffs and the amounts agreed to by the parties to settle these claims.

The parties agree to the payment of $191,236.07 to resolve all fees and costs incurred during the First Quarter of 2025, for monitoring and/or litigation activities in the Board of Parole Hearings (BPH) portion of the case. Attached hereto as **Exhibit B** are charts setting forth the fees and costs claimed by Plaintiffs and the amounts agreed to by the parties to settle these claims.

The parties agree to the payment of $123,773.05 to resolve all fees and costs incurred during the First Quarter of 2025, for monitoring and/or litigation activities in the Division of Adult Parole Operations (DAPO) portion of the case. Attached hereto as **Exhibit C** are charts setting forth the fees and costs claimed by Plaintiffs and the amounts agreed to by the parties to settle these claims.

The parties agree to the payment of $35,347.95 to resolve all fees and costs incurred during the First Quarter of 2025, for fees work. Attached hereto as **Exhibit D** are charts setting forth the fees and costs claimed by Plaintiffs and the amounts agreed to by the parties to settle these claims.

IT IS HEREBY ORDERED that the amounts set forth above are due and collectable as of forty-five days from the date of entry of this Order. Interest on these fees and costs will run from May 19, 2025, accruing at the rate provided by 28 U.S.C. § 1961.

DATED: 5/14/2025

Claudia Wilken
United States District Judge

APPROVED AS TO FORM:

DATED: May 13, 2025

/s/Sharon Garske
Sharon Garske
Deputy Attorney General
Attorney for Defendants

DATED: May 13, 2025

/s/Gay Crosthwait Grunfeld
Gay Crosthwait Grunfeld
Rosen Bien Galvan & Grunfeld LLP
Attorney for Plaintiffs

EXHIBIT A

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025

CDCR/AOAP SUMMARY OF UNDISPUTED FEES AND COSTS

MATTER	UNDISPUTED FEES	UNDISPUTED COSTS
CDCR/AOAP MONITORING	$2,521,417.61	$45,704.49
	TOTAL UNDISPUTED:	**$2,567,122.10**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Matter: CDCR/AOAP Monitoring/Merits

Monitoring (581-3)	Actual Hours	Claimed Hours	2025 Rates	Total	Fees Now Owing Based On Negotiated Compromise
ROSEN, BIEN, GALVAN & GRUNFELD					
Michael W. Bien (MWB)	6.50	5.40	$1,675	$9,045.00	$8,773.65
Gay C. Grunfeld (GCG)	23.10	23.10	$1,325	$30,607.50	$29,689.28
Ernest Galvan (EG)	0.50	0.50	$1,150	$575.00	$557.75
Penny Godbold (PG)	351.90	351.90	$935	$329,026.50	$319,155.71
Thomas Nolan (TN)	179.70	177.40	$935	$165,869.00	$160,892.93
Michael L. Freedman (MLF)	42.80	41.90	$925	$38,757.50	$37,594.78
Ben Bien-Kahn (BBK)	7.60	7.60	$900	$6,840.00	$6,634.80
Kara J. Janssen (KJJ)	0.50	0.00	$875	$0.00	$0.00
Caroline E. Jackson (CEJ)	64.00	64.00	$850	$54,400.00	$52,768.00
Michael S. Nunez (MSN)	8.50	7.30	$850	$6,205.00	$6,018.85
Eric Monek Anderson (EMA)	125.60	125.60	$600	$75,360.00	$73,099.20
Hannah Chartoff (HMC)	44.70	42.20	$575	$24,265.00	$23,537.05
Benjaim C. Hattem (BCH)	52.90	52.90	$525	$27,772.50	$26,939.33
Karen Stilber (KES)	95.70	95.60	$470	$44,932.00	$43,584.04
Linda Woo (LHW)	6.40	0.00	$470	$0.00	$0.00
F. Gail LaPurja (FGL)	14.00	0.00	$445	$0.00	$0.00
Angela Laureano (AL) (Paralegal)	15.80	15.70	$350	$5,495.00	$5,330.15
Darcy Edmundson (DE)	12.30	12.30	$350	$4,305.00	$4,175.85
Emma Lower (ERL)	287.70	285.10	$350	$99,785.00	$96,791.45
Kamila Barragan (KB)	2.60	0.00	$350	$0.00	$0.00
Nathalie Welch (NW)	16.20	14.80	$350	$5,180.00	$5,024.60
Sherry Zhu (SJZ)	16.00	16.00	$350	$5,600.00	$5,432.00
Simran Surtani (SMS)	272.60	271.30	$350	$94,955.00	$92,106.35
Victor Corona (VC)	34.90	34.40	$350	$12,040.00	$11,678.80
Aidan Loh (ALO)	395.40	395.10	$310	$122,481.00	$118,806.57
AJ Alany (AJA)	12.60	12.60	$310	$3,906.00	$3,788.82
Isabella Grundseth (IEG)	17.40	17.40	$310	$5,394.00	$5,232.18
Riya Matta (RM)	366.30	361.50	$310	$112,065.00	$108,703.05
Total Hours:	**2,474.20**	**2,431.60**			
RBGG FEES:				**$1,284,861.00**	**$1,246,315.17**
PRISON LAW OFFICE					
Rita Lomio (RL)	19.70	19.70	$925	$18,222.50	$17,675.83
Daniel Greenfield	92.10	92.10	$900	$82,890.00	$80,403.30
Margot Mendelson (MM)	15.20	15.20	$875	$13,300.00	$12,901.00
Jerrod Thompson	289.40	289.40	$875	$253,225.00	$245,628.25
Tess Borden (TB)	217.60	217.60	$725	$157,760.00	$153,027.20
Jacob Hutt (JH)	26.90	26.90	$575	$15,467.50	$15,003.48
Megha Ram (MR)	121.80	121.80	$550	$66,990.00	$64,980.30
Patrick Booth (PB)	146.30	146.30	$525	$76,807.50	$74,503.28
Amber Norris (AN)	160.50	160.50	$450	$72,225.00	$70,058.25
Gabriela Pelsinger (GP)	56.30	56.30	$450	$25,335.00	$24,574.95
Ilian Meza Pena (IP)	99.90	99.90	$450	$44,955.00	$43,606.35
Joanna Cardenas (JC)	211.50	211.50	$450	$95,175.00	$92,319.75
Skye Lovett (SL)	313.70	313.70	$450	$141,165.00	$136,930.05
Tania Amarillas (TA)	238.30	238.30	$450	$107,235.00	$104,017.95
Audrey Lim (AL)	51.50	51.50	$350	$18,025.00	$17,484.25
Dewi Zarni (DZ)	50.10	50.10	$350	$17,535.00	$17,008.95
Emilio Bustamante (EB)	72.70	72.70	$350	$25,445.00	$24,681.65
Jenny Aguilar (JA)	86.50	86.50	$350	$30,275.00	$29,366.75
Jessica Shen (JS)	90.80	90.80	$350	$31,780.00	$30,826.60
Joshua Marin (JM)	27.00	27.00	$350	$9,450.00	$9,166.50
Total Hours:	**2,387.80**	**2,387.80**			
PLO FEES:				**$1,303,262.50**	**$1,264,164.63**
DISABILITY RIGHTS EDUCATION AND DEFENSE FUND					
Claudia Center (CC)	10.74	10.74	$1,015	$10,901.10	$10,574.07
Case Clerk (H. Min)	1.50	1.50	$250	$375.00	$363.75
Total Hours:	**12.24**	**12.24**			
DREDF FEES:				**$11,276.10**	**$10,937.82**
TOTAL CDCR/AOAP MONITORING FEES:				**$2,599,399.60**	**$2,521,417.61**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Costs

Matter: CDCR/AOAP Merits/Monitoring

			Costs Now Owing
Rosen, Bien, Galvan & Grunfeld (581-3)		**Costs**	**Based On Negotiated Compromise**
Photocopying/printing (Outside)		$2,235.46	$2,168.40
Expert Services		$12,440.00	$12,066.80
Transcription and Translation		$600.00	$582.00
Data storage		$4,686.00	$4,545.42
Online Research - PACER, Westlaw, articles		$105.64	$102.47
Postage & Delivery		$481.64	$467.19
Travel - Mileage, Tolls, Food		$15,927.77	$15,449.94
	Total RBGG Costs:	**$36,476.51**	**$35,382.21**
Prison Law Office			
Translation/interpreting/SLI		$1,600.00	$1,552.00
Travel - Mileage, Tolls, Food		$7,046.48	$6,835.09
Postage & Delivery		$1,851.82	$1,796.27
	Total PLO Costs:	**10,498.30**	**$10,183.35**
Disability Rights Education & Defense Fund, Inc.			
Photocopying (in-house)		$108.80	$105.54
Postage & Delivery		$34.42	$33.39
	Total DREDF Costs:	**$143.22**	**$138.92**
	TOTAL CDCR/AOAP MERITS/MONITORING COSTS:	**$47,118.03**	**$45,704.49**

EXHIBIT B

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025

BPH SUMMARY OF UNDISPUTED FEES AND COSTS

MATTER	UNDISPUTED FEES	UNDISPUTED COSTS
BPH	$186,386.96	$4,849.12
	TOTAL UNDISPUTED:	**$191,236.07**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Matter: BPH

BPH (581-4)		Actual Hours	Claimed Hours	2025 Rates	Total	Fees Now Owing Based On Negotiated Compromise
BPH MONITORING (581-4)						
ROSEN, BIEN, GALVAN & GRUNFELD						
Michael W. Bien (MWB)		0.70	0.70	$1,675	$1,172.50	$1,137.33
Gay C. Grunfeld (GCG)		4.1	4.1	$1,325	$5,432.50	$5,269.53
Thomas Nolan (TN)		52.70	52.70	$935	$49,274.50	$47,796.27
Penny Godbold (PG)		2.20	2.20	$935	$2,057.00	$1,995.29
Caroline E. Jackson (CEJ)		74.30	73.80	$850	$62,730.00	$60,848.10
Eric Monek Anderson (EMA)		0.10	0.00	$600	$0.00	$0.00
Hannah Chartoff (HMC)		36.20	36.20	$575	$20,815.00	$20,190.55
Gregorio Gonzalez (GZG)		0.50	0.00	$445	$0.00	$0.00
Nathalie Welch (NW)		76.30	76.30	$350	$26,705.00	$25,903.85
Angela Laureano (AL)		2.70	0.00	$350	$0.00	$0.00
Aiden Loh (ALO)		12.50	12.50	$310	$3,875.00	$3,758.75
Emma Lower (ERL)		4.70	4.70	$350	$1,645.00	$1,595.65
Simran Surtani (SMS)		3.70	3.70	$350	$1,295.00	$1,256.15
	Total Hours:	**273.60**	**266.90**			
RBGG FEES:					**$175,001.50**	**$169,751.46**
PRISON LAW OFFICE						
Rana Anabtawi (RA)		19.6	19.6	$875	$17,150.00	$16,635.50
	Total Hours:	**19.60**	**19.60**			
PLO FEES:					**$17,150.00**	**$16,635.50**
TOTAL FEES FOR BPH WORK:					**$192,151.50**	**$186,386.96**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Costs

Matter: BPH

Rosen, Bien, Galvan & Grunfeld (581-4)		**Costs**	**Costs Now Owing Based On Negotiated Compromise**
Transription and translation		$4,000.00	$3,880.00
Pacer and Westlaw		$15.80	$15.33
Postage and delivery		$39.30	$38.12
Travel - Mileage, Tolls, Food		$831.39	$806.45
	Total RBGG Costs:	**$4,886.49**	**$4,739.90**
Prison Law Office			
Travel - Mileage, Tolls, Food		$112.60	$109.22
	Total PLO Costs:	**$112.60**	**$109.22**
	TOTAL BPH COSTS:	**$4,999.09**	**$4,849.12**

EXHIBIT C

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025

DAPO SUMMARY OF UNDISPUTED FEES AND COSTS

MATTER	UNDISPUTED FEES	UNDISPUTED COSTS
DAPO MONITORING	$121,560.89	$2,212.16
	TOTAL UNDISPUTED:	**$123,773.05**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Matter: DAPO Monitoring

DAPO Monitoring (581-9)	Actual Hours	Claimed Hours	2025 Rates	Total	Fees Now Owing Based On Negotiated Compromise
ROSEN, BIEN, GALVAN & GRUNFELD					
Michael W. Bien (MWB)	0.10	0.00	$1,675	$0.00	$0.00
Gay C. Grunfeld (GCG)	1.30	1.30	$1,325	$1,722.50	$1,670.83
Penny Godbold (PG)	4.70	4.70	$935	$4,394.50	$4,262.67
Thomas Nolan (TN)	41.10	39.10	$935	$36,558.50	$35,461.75
Benjamin Bien-Kahn (BBK)	2.50	0.00	$900	$0.00	$0.00
Caroline E. Jackson (CEJ)	21.10	21.10	$850	$17,935.00	$17,396.95
Eric Monek Anderson (EMA)	0.60	0.00	$600	$0.00	$0.00
Hannah Chartoff (HMC)	20.20	20.20	$575	$11,615.00	$11,266.55
Benjamin C. Hattem (BCH)	7.40	7.40	$525	$3,885.00	$3,768.45
Nathalie Welch (NCW)	145.60	140.60	$350	$49,210.00	$47,733.70
Total Hours:	**244.60**	**234.40**			
RBGG FEES:				**$125,320.50**	**$121,560.89**
TOTAL FEES FOR DAPO MONITORING WORK:				**$125,320.50**	**$121,560.89**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Costs

Matter: DAPO Monitoring

Rosen, Bien, Galvan & Grunfeld (581-9)	**Costs**	**Costs Now Owing Based On Negotiated Compromise**
Westlaw	$26.74	$25.94
Postage & Delivery	$441.81	$428.56
Travel - Mileage, Tolls, Food	$1,812.03	$1,757.67
Total RBGG Costs:	**$2,280.58**	**$2,212.16**
TOTAL CLAIMED DAPO MONITORING COSTS:	**$2,280.58**	**$2,212.16**

EXHIBIT D

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025

SUMMARY OF UNDISPUTED FEES WORK AND COSTS

	UNDISPUTED FEES	UNDISPUTED COSTS
FEES WORK (ALL MATTERS)	$35,279.87	$68.08
TOTAL UNDISPUTED:		**$35,347.95**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Matter: All Matters Fees Work

Fees (581-2)	Actual Hours	Claimed Hours	2025 Rates	Total	Fees Now Owing Based On Negotiated Compromise
ROSEN, BIEN, GALVAN & GRUNFELD					
Gay C. Grunfeld (GCG)	13.70	13.50	$1,325	$17,887.50	$17,350.88
Karen E. Stilber (KES)	16.90	14.90	$470	$7,003.00	$6,792.91
Nathalie C. Wlech (NCW)	0.20	0.00	$350	$0.00	$0.00
Kedra Chan (KC)	7.50	0.00	$350	$0.00	$0.00
Total Hours:	**30.60**	**28.40**			
RBGG FEES:				**$24,890.50**	**$24,143.79**
PRISON LAW OFFICE					
Margot Mendelson (MKM)	2.80	2.80	$875	$2,450.00	$2,376.50
Tess Borden (TB)	5.00	5.00	$725	$3,625.00	$3,516.25
Patrick Booth (PB)	3.10	3.10	$525	$1,627.50	$1,578.68
Ashley Kirby (AK)	11.00	11.00	$325	$3,575.00	$3,467.75
Total Hours:	**21.90**	**21.90**			
PLO FEES:				**$11,277.50**	**$10,939.18**
DISABILITY RIGHTS EDUCATION AND DEFENSE FUND					
Claudia Center	0.20	0.20	$1,015	$203.00	$196.91
Total Hours:	**0.20**	**0.20**			
DREDF FEES:				**$203.00**	**$196.91**
TOTAL FEES FOR ARMSTRONG FEES WORK:				**$36,371.00**	**$35,279.87**

Armstrong v. Newsom
First Quarterly Statement of 2025
January 1, 2025 through March 31, 2025
Costs

Matter: Fees Work in All Matters

Rosen, Bien, Galvan & Grunfeld (581-2)		**Costs**	**Costs Now Owing Based On Negotiated Compromise**
Postage & Delivery		$70.19	$68.08
	Total RBGG Costs:	**$70.19**	**$68.08**
	TOTAL FEES WORK COSTS :	**$70.19**	**$68.08**

EXHIBIT Q

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NATIONAL FEDERATION OF THE BLIND OF CALIFORNIA, et al.,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

Case No. 14-cv-04086-NC

AMENDED ORDER GRANTING IN PART PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND COSTS; DENYING ADMINISTRATIVE MOTION TO SEAL

Re: Dkt. Nos. 185, 189

In this class action, plaintiffs National Federation of the Blind ("NFIB") and various disabled individuals accused defendant Uber Technologies, Inc. of failing to accommodate their disabled customers traveling with service animals. In 2016, the parties settled the class action. Plaintiffs now bring their second motion for attorneys' fees and costs seeking reimbursement for their efforts monitoring Uber's compliance with the settlement. *See* Dkt. No. 185. The Court finds that Plaintiffs are entitled to fees, but certain fees are unreasonable. Accordingly, the Court GRANTS IN PART and DENIES IN PART Plaintiffs' motion for attorneys' fees and costs.

I. Procedural History

In September 2014, Plaintiffs initiated this class action against Uber alleging discrimination against the blind under the Americans with Disabilities Act ("ADA"), 42

U.S.C. § 12101 *et seq.* and various California-law analogues. *See* Dkt. No. 1. The parties settled the case in January 2016 (*see* Dkt. No. 70; *see also* Dkt. No. 85-1 ("Settlement")) and the Court granted final approval of the class settlement on December 6, 2016 (*see* Dkt. No. 139). On December 15, 2016, the Court awarded Plaintiffs attorneys' fees and costs pursuant to the Settlement. *See* Dkt. Nos. 139, 144.

Plaintiffs now seek additional attorneys' fees and costs for resources expended in monitoring Uber's settlement compliance. *See* Dkt. No. 185. Plaintiffs voluntarily agree to reduce their claimed amount by 5% across the board. *See id.* at 19.[1] Uber opposes, arguing that Plaintiffs are not entitled to additional fees and, even if they were, Plaintiffs' request is unreasonable. *See generally* Dkt. No. 187.

II. Settlement Agreement

Certain sections of the Settlement are relevant to this motion. The Court summarizes those portions below.

The Settlement requires Uber to "collect and report to Plaintiffs' Counsel" rating and complaint information for riders with service animals. *See* Settlement § 6.A. Uber is required to report the raw data for that information to Plaintiffs' Counsel. *Id.* § 6.B.1. In addition, if Plaintiffs' Counsel provides Uber with a documented complaint of discrimination by a rider, Uber is required to verify corresponding data and assign a unique number identifier to the allegedly offending driver. *See id.* § 6.B.2.

NFIB is required to create a "compliance testing program" that uses blind testers with guide dogs using Uber's UberX service to test compliance. *Id.* § 6.C. Uber agreed to pay NFIB $225,000 "to support the testing program." *Id.* § 11.A. If the Settlement is extended, Uber is required to pay NFIB an additional $75,000 to support the program. *See id.* §§ 7, 11.A.

The Settlement also requires an appointment of a third-party Monitor. *See id.* § 8. Annually, the Monitor is obligated to "review and analyze" all data collected and reported

[1] All page numbers reference the page numbers automatically generated by ECF unless otherwise indicated.

by Uber pursuant to Section 6 of the Settlement, in addition to "any other information provided to the Monitor by the Parties." *Id.* The Monitor then reports to the Parties whether Uber substantially complied with the Settlement during the preceding year. *Id.* The Monitor is also required to "propose . . . further modifications to Uber's policies, practices, and procedures" if such policies, practices, or procedures were insufficient to address discrimination. *Id.*

Lastly, the Settlement permits Plaintiffs to seek attorneys' fees and costs incurred up through the effective date of the Settlement. *Id.* § 11.C. Uber agreed "not to dispute the entitlement to reasonable Attorneys' Fees incurred up through the Effective Date of [the] Agreement[,]" but reserved the right to dispute the amount of fees requested. *Id.* For fees and costs related to "work performed after the time the Settlement Agreement is signed by all Parties, including for work spent on compliance monitoring, enforcement, and/or work spent securing their fees[,]" Plaintiffs reserved their rights to pursue such fees, but the Settlement acknowledged that "all issues pertaining to any such attorneys' fees, costs, and expenses are unresolved . . . ." *Id.* § 11.C.1. The Parties are required to confer and negotiate as to any fees and costs related to Plaintiffs' Counsel's monitoring efforts before petitioning the Court. *Id.* § 11.C.2.

The Court retained jurisdiction. *See id.* § 12; *see also* Dkt. No. 145.

III. Discussion

A. Entitlement to Fees

The parties first dispute whether Plaintiffs are entitled to fees. *See* Dkt. No. 187 at 11. According to Uber, the Settlement did not authorize attorneys' fees for monitoring work and the ADA's fee-shifting statute does not allow such fees. *Id.* The Court disagrees.

In *Prison Legal News v. Scharzenegger*, 608 F.3d 446 (9th Cir. 2010), the Ninth Circuit reaffirmed that "a party that prevails by obtaining a consent decree may recover attorneys' fees under [42 U.S.C.] § 1988 for monitoring compliance with the decree, even when such monitoring does not result in any judicially sanctioned relief." *Prison Legal*

News, 608 F.3d at 451 (citing *Keith v. Volpe*, 833 F.2d 850, 855–57 (9th Cir. 1987)). Thus, plaintiffs may recover attorneys' fees for monitoring compliance with a settlement agreement under § 1988. *Id.* at 452; *see also Balla v. Idaho*, 677 F.3d 910, 916 (9th Cir. 2012) ("[M]onitoring fees not resulting in additional relief are allowable . . . .").

Uber contends that *Prison Legal News* and its progeny are inapposite because those cases concern a different fee shifting statute. But § 1988 and the ADA's fee-shifting statute, 42 U.S.C. § 12205, are virtually identical. *Compare* 42 U.S.C. § 1988(b) ("the court, in its discretion, may allow the prevailing party . . . a reasonable attorney's fee as part of the costs . . . .") *with* 42 U.S.C. § 12205 ("the court or agency, in its discretion, may allow the prevailing party . . . a reasonable attorney's fee, including litigation expenses, and costs . . . ."). Uber has not identified any principled reason why the Court should interpret the two statutes differently.

Moreover, the Supreme Court rejected a similar argument in *Pennsylvania v. Delaware Valley Citizens' Council for Clean Air*, 478 U.S. 546 (1986). There, the court noted that the fee-shifting provisions of the Clean Air Act and § 1988 served "the common purpose of . . . promot[ing] citizen enforcement of important federal policies," such that there was "no reason not to interpret both provisions governing attorney's fees in the same manner." *Id.* at 560. The same is true of the ADA's fee-shifting statute and § 1988. *See Buckhannon Bd. & Care Home v. W.V. Dep't of Health & Human Res.*, 532 U.S. 598, 629–30 (2001) ("the . . . ADA fee-shifting prescriptions [were] modeled on 42 U.S.C. § 1988 unmodified . . . ."), *superseded by statute on other grounds*.

Nor does the language of the Settlement foreclose attorneys' fees for monitoring work. Rather, the Settlement explicitly acknowledges that "all issues pertaining to" fees, costs, and expenses relating to "work performed after the time the Settlement Agreement is signed . . . including for work spent on compliance monitoring [and] enforcement" was an unresolved issue. *See* Settlement § 11.C.1.

Accordingly, the Court finds that Plaintiffs are entitled to reasonable attorneys' fees incurred in connection with monitoring Uber's compliance with the Settlement.

B. Reasonableness of Fees

Uber does not contest the reasonableness of Plaintiffs' claimed costs. *See* Dkt. No. 185 at 27 (requesting costs in the amount of $685.36). Plaintiffs adequately documented those costs and they appear reasonable. Accordingly, the Court GRANTS Plaintiffs' requests for costs in the amount of **$685.36**.

Uber also does not challenge Plaintiffs' counsels' claimed rates and the Court previously approved Plaintiffs' counsels' rates. *See* Dkt. No. 144. Although Plaintiffs' counsels rates have increased, the increase is modest and the Court FINDS that Plaintiffs' counsels' rates remain reasonable. *Compare* Dkt. No. 142 at 4 *with* Dkt. No. 185-1 at 21.

Instead, Uber challenges five categories of Plaintiffs' requested attorneys' fees as unnecessary or unreasonable. *See* Dkt. No. 187 at 14–22. Uber also argues that Plaintiffs' fees should be further reduced due to vague time entries and block billing. *Id.* at 22–24. The Court will first address each category of contested fees, then turn to Uber's objections. *See* Dkt. No. 185-1, Ex. G (summary of claimed fees).

1. Work Related to Conferring with Monitor

In this category, Plaintiffs claim fees for hours spent (1) analyzing Uber's data reports and (2) for work related to conferring with the Monitor about those reports. *See* Dkt. No. 185-1 ("Galvan Decl.") ¶¶ 42–43. Uber concedes that the hours spent analyzing Uber's reports are compensable,[2] but argues that the hours spent for work relating to conferring with the Monitor was unnecessary. *See* Dkt. No. 187 at 15–16. According to Uber, such work is not compensable because the Settlement limits Plaintiffs' counsel's involvement with the Monitor's review Uber's data reports. *Id.* at 15. Specifically, Uber contends that the Settlement only contemplates review of its reports by Plaintiffs' counsel and "formal analyses . . . or opining with or conferring with the Monitor about Uber's data reports" is outside the scope of the Settlement. *Id.*

The Court disagrees. While the Settlement explicitly requires Uber to provide

[2] Uber argues that these hours should be reduced as they were block billed. *See* Dkt. No. 187 at 16. The Court will address Plaintiffs' block billing below.

Plaintiffs' counsel with data reports for analysis (*see* Settlement §§ 6.A, 6.B.1), the Settlement does not limit Plaintiffs' counsel's involvement to that of a passive observer. Rather, the Settlement requires the Monitor to consider "any other information provided," suggesting by implication that Plaintiffs' counsel are permitted to submit their own commentary on Uber's data reports. *Id.* § 8. Accordingly, work conducted by Plaintiffs' counsel relating to conferring with the Monitor is generally compensable.

However, the fact that the Settlement permits Plaintiffs to supply their own commentary on Uber's data reports to the Monitor is not a license to bill for wholly unnecessary work that is duplicative of Uber's reports. *See Balla*, 677 F.3d at 919 ("[T]he court [must] exercise discretion [to] assure that the case is not being milked by a monitor after the injunction has been obtained, for fees that are unreasonable in amount, for work not reasonably performed to enforce the relief, or for work not directly related to enforcing the relief."). It is unclear, for example, why Plaintiffs need to draft, review, and submit declarations from individual complaining class members, particularly when there is no indication that Plaintiffs believe Uber's internal data keeping was inaccurate. *See, e.g.*, Galvan Decl., Ex. F, pt.1 at 101 (billing over 6 hours at $400 per hour to review or draft class member declarations), 113 (reviewing and drafting various class member declarations). Further, Plaintiffs' billing records for this category of work contain several vague time entries, some of which have questionable billing value. *See, e.g.*, *id.* at 147 (billing 0.8 hours at $275 per hour for "[m]aking a declaration, cover letter, and report accessible"). Most of the hours, however, appear reasonable.

Accordingly, the Court will reduce Plaintiffs' counsel's fee for work relating to conferring with the Monitor by 10% in addition to Plaintiffs' voluntary 5% reduction. The Court will not reduce Plaintiffs' counsel's fee for analyzing Uber's data beyond Plaintiffs' voluntary 5% reduction. Thus, Plaintiffs are entitled to **$59,528.90** and **$34,143.95** for these two sub-categories of work, respectively.

2. Work Related to Communicating with Class Members

This category contains three sub-categories of work: (1) communicating with class

members to address and respond to discrimination complaints; (2) submitting information requests to Uber pursuant to the Settlement's process (*see* Settlement § 6.B.2); and (3) following up with class members who participated in NFIB's compliance testing program (*see id.* § 6.C). Uber concedes that the second sub-category of work is compensable but argues that the first and third sub-categories are not. *See* Dkt. No. 187 at 16.

As to the first sub-category of work—communicating with class members to address and respond to discrimination complaints—Uber is correct that Plaintiffs should not be compensated to the extent they are merely creating a parallel complaint investigations process. The Settlement itself already creates a procedure for class members to raise discrimination complaints—a procedure hailed by Plaintiffs as a significant boon for the class. *See* Dkt. No. 84.

This does not mean, however, that Plaintiffs' counsel is required to sit on their hands and rubber-stamp Uber's efforts. Plaintiffs' counsel's obligations to the class requires them to take an active role in ensuring that the Settlement is working as intended. And communicating with class members regarding Uber's behavior is the core of monitoring efforts. In *Prison Legal News*, for example, the Ninth Circuit affirmed attorneys' fees for "reviewing and responding to letters from [class members] complaining about" the defendants' failure to comply with the settlement. *Prison Legal News*, 608 F.3d at 453. The Ninth Circuit noted that "[w]ithout such correspondence [with class members], it would be difficult for [plaintiffs] to discover or document violations of the terms of the settlement." *Id.*

Upon review of Plaintiffs' records, the Court is persuaded that Plaintiffs' communication with class members regarding their discrimination complaints is limited to compiling information relating to their monitoring efforts and does not create a parallel track for investigating complaints.

As to the third sub-category of work—communications with class members who participated in NFIB's compliance testing program—the Court agrees with Uber. Plaintiffs have already been compensated for work related to NFIB's compliance testing

program. Section 11.A of the Settlement requires Uber to pay NFIB $225,000 "to support the testing program." Such payments naturally encompass fees and costs incurred in reviewing program data or following up with program participants. Plaintiffs may not double-dip for the compliance testing program. Disallowed amounts are listed in the chart below.[3] Although some of these entries were coded by Plaintiffs as "Settlement Modifications" work, the Court compiles all disallowed NFIB-related hours here:

Entry Description	Date of Entry	Claimed Time	Claimed Amount	Page Number of Entry
Prepare final language for message to intakes and NFB testing participants who reported denials	2/2/2018	0.40	$216	5
Analysis of NFB testing ride data	2/23/2018	1.10	$385	17
Phone call with T Elder re NFB testing and follow up re same	4/2/2018	0.70	$329	26
Reviewing Uber NFB testing data	4/2/2018	1.30	$611	26
Phone call with T Elder and M Nunez regarding additional information sharing, NFB testing, and next steps	9/14/2018	1.00	$470	75
Discussing internal next steps with S Seaborn regarding information sharing and NFB testing	9/14/2018	1.00	$470	75
Case strategy re NFB testing	9/28/2018	0.10	$47	78

[3] Entries are drawn from Galvan Decl., Ex. F. Page numbers reference those included with the exhibit. Certain entries are block billed. Because the Court is unable to discern how much time was spent on compliance testing issues, block billed entries are disallowed.

discussion with S Seaborn				
Preparing outline re NFB testing	9/28/2018	0.50	$235	78
Correspondence with co-counsel re NFB testing	10/1/2018	0.10	$47	78
Planning NFB testing meeting with T Elder	10/2/2018	0.10	$47	78
Strategy telecon with M Riess, T Elder and M Nunez to discuss parameters for random sample compliance testing and consultant support needed for same	10/5/2018	0.70	$549.50	79
Attending planning call with SS, MR and MN to discuss compliance data and position on pool policy change	10/5/2018	0.70	$378	79
Attend strategy call re next steps re settlement monitoring issues and revising testing program	10/5/2018	0.70	$367.50	79
Preparing notes for call regarding testing and UberPool	10/5/2018	0.20	$94	79
Phone call with M Nunez, T Elder and S Seaborn regarding testing, UberPool policy, and complaint intakes	10/5/2018	0.70	$329	79
Call with consultant re possible changes to testing program, and call with legal team afterward . . .	10/9/2018	1.60	$840	80

Correspondence with team re meeting re compliance data and testing	10/11/2018	0.30	$141	82
Phone call re data and compliance testing	10/11/2018	1.50	$705	82
Review class member service issues in NFB tester reports; follow up re same	11/15/2018	0.40	$100	86
Review and respond to questions from SJE re NFB testers	12/14/2018	0.10	$52.50	92
Total Disallowed			**$6,413.50**	

Accordingly, Plaintiffs are entitled to attorneys' fees for communicating with class members and submitting information requests to Uber less Plaintiffs' voluntary 5% reduction in fees. This amounts to **$66,357.50**.

3. Work Relating to Unwarranted or Abandoned Modifications

In this category, Plaintiffs seek attorneys' fees relating to their efforts to modify the Settlement in three ways: (1) policies relating to Uber's UberPool service; (2) seeking quarterly data extension; and (3) requesting further data sharing provisions. Plaintiffs also seek attorneys' fees for work relating to their settlement modification efforts that were not specifically allocated to a single sub-category. *See* Dkt. No. 185 at 13–14; Dkt. No. 195 at 4–5. Uber concedes that the second sub-category of fees relating to quarterly data extensions are compensable. *See* Dkt. No. 187 at 18, 20. The first and third sub-category, according to Uber, are not compensable because those proposals were unnecessary or not accepted. *Id.* at 18–19. Uber also argues that Plaintiffs' records documenting work relating to unspecified settlement modification efforts is too vague and may hide double-billing. *See* Dkt. No. 200 at 5–6.

First, the Court rejects Uber's argument that those hours are not compensable because the Settlement has been effective. Disallowing monitoring fees because Plaintiffs were successful in negotiating and crafting a successful settlement would be counter-productive. Monitoring fees are permissible so long as they are not unreasonable and are related to enforcing the settlement. *See Balla*, 677 F.3d at 919.

Second, Uber concedes that Plaintiffs' proposed modifications to its UberPool program and the data sharing provisions of the Settlement have been adopted "in a very limited fashion voluntarily by Uber." Dkt. No. 187 at 19. But Plaintiffs are not required to achieve complete victory nor were they required to obtain a court order or official modification to be entitled to fees. In *Balla*, Ninth Circuit affirmed modification fees even though the plaintiffs' motion to hold the defendant in contempt was denied because plaintiffs' motion practice "played a key role in resolving" the underlying issue. *Balla*, 677 F.3d at 920 (quotations omitted). The Ninth Circuit noted that "[i]f in a battle to take a hill, the adversary flees instead of fighting to a bloody defeat, the taking of the hill makes the battle a victory." *Id.*

Here, although they may not have achieved wholesale adoption of these proposals, Plaintiffs achieved at least some success as to their UberPool, quarterly data extension, and further data sharing proposals. Plaintiffs seek fees connected to those proposals. After reviewing Plaintiffs' records, the billed amounts appear reasonable. Less Plaintiffs' voluntary 5% reduction, Plaintiffs are entitled to **$29,324.61** for work related to these three sub-categories.[4]

As to Plaintiffs' requested fees for unspecified settlement modification work, the Court shares Uber's concern that counsels' records are vague. While the Court is not persuaded that Plaintiffs' counsel double-billed for unspecified settlement modification work related to the three sub-categories discussed in this order, the parties' submissions

[4] As mentioned in footnote 3, *supra*, some entries block billed NFIB-testing-program-related work and UberPool work. Because the Court already eliminated those fees—$801 in total—it does not do so again here.

make clear that Plaintiffs' counsel spent time working on settlement modification proposals that ultimately went nowhere. *See* Galvan Decl. ¶¶ 45–47; Dkt. No. 187-1 ("Spurchise Decl."), Ex. 2. In particular, Plaintiffs proposed modifications to the Settlement's education provisions in addition to the three sub-categories already discussed. *See* Spurchise Decl., Ex. 2 at 4. Because it is not clear that the wholly abandoned education proposal played any role in their overarching settlement modification efforts, hours expended relating to that proposal is not compensable. *Cf. Balla*, 677 F.3d at 920 (fees expended on efforts that "play[] a key role" are compensable).

Accordingly, the Court will reduce Plaintiffs' counsel's fee for work relating to unspecified settlement modification work by 20% in addition to Plaintiffs' voluntary 5% reduction. This amounts to **$44,689.90** in fees for unspecified settlement modification work. In total, Plaintiffs are entitled to **$74,014.51** for work relating to their settlement modification efforts.

4. Other Direct Monitoring Work

This category of work includes (1) responding to inquiries from the United States Department of Justice regarding the Settlement; (2) investigating Uber's filings with the California Public Utilities Commission, arbitrations of service animal issues, and other similar developments; (3) corresponding with Uber to verify compliance with Settlement requirements; and (4) conferring with a consultant regarding evaluating the efficacy of the Settlement at reducing discrimination against class members.

Here, Uber simply argues that this work is not compensable because these tasks were "[too] attenuated" from the Settlement. Dkt. No. 185 at 21. The Court is not convinced. Corresponding with and investigating actions taken by regulatory bodies responsible for discrimination complaints is well within the scope of monitoring compliance with a discrimination-related settlement. Likewise, Plaintiffs are entitled to reasonable consultant fees to evaluate whether the Settlement is working as intended.

Accordingly, Plaintiffs are entitled to attorneys' fees for their direct monitoring work less their voluntary 5% reduction in fees. This amounts to **$13,130.90**.

5. Fees Relating to Plaintiffs' Unfiled Attorneys' Fee Motion

The next category of fees relates to work expended by Plaintiffs' counsel on an unfiled fees motion. In March 2018, the parties began negotiating Plaintiffs' counsel's attorneys' fees for work conducted in 2017. *See* Galvan Decl. ¶¶ 64–70; Spurchise Decl. ¶¶ 4–5. Under the Settlement, the parties are required to negotiate such fees within 60 days before seeking Court intervention. *See* Settlement § 11.C.2. The parties initially failed to come to an agreement within the 60-day limit, but ultimately settled the dispute by July 2, 2018. *See* Galvan Decl. ¶¶ 67–69; Spurchise Decl. ¶¶ 4–5. The fees motion was thus never filed.

Given the Settlement's requirement that the parties negotiate their fees dispute, it was unreasonable for Plaintiffs to bill for hours preparing a fee motion prior to April 30, 2018—the end of the 60-day negotiation period. Once it became clear that no settlement was forthcoming, however, Plaintiffs were entitled to begin preparing their fees motion and are entitled to fees for time spent accordingly. Thus, the Court disallows all fees billed prior to April 30, 2018, less Plaintiffs' voluntary 5% reduction. Accordingly, Plaintiffs are entitled to **$4,393.75** in fees and costs for their unfiled fees motion. *See* Galvan Decl., Ex. F, pt. 2 at 7–12.

6. Fees Relating to This Fees Motion

Finally, Plaintiffs request fees for preparing the instant fees motion. Plaintiffs request $64,019.25 for hours worked from May 14, 2019—the last day of the parties' negotiation period—to August 25, 2019. *See* Dkt. No. 190 at 20. After being given an opportunity to respond, Uber did not oppose Plaintiffs' request for fees relating to the instant fees motion. *See* Dkt. Nos. 199, 200.

Reviewing Plaintiffs' records (*see* Dkt. No. 190-1 at 24–29), the requested hours are well documented and appear reasonable. Accordingly, after accounting for Plaintiffs' voluntary reductions, Plaintiffs are entitled to **$64,019.25** in fees relating to this fees motion.

/ / /

7. Specific Challenges to Hours

Uber challenges 13.2 hours as unduly vague and an additional 137.7 hours for impermissible block billing.[5] The Court first addresses Uber's vagueness challenges before turning to the alleged block-billed hours.

When submitting entries for attorneys' fee awards, attorneys are "not required to record in great detail how each minute of [their] time was expended." *Hensley v. Eckerhart*, 461 U.S. 424, 437 n.12 (1983). Attorneys need only "keep records in sufficient detail that a neutral judge can make a fair evaluation of the time expended, the nature and need for the service, and the reasonable fees to be allowed." *Id.* at 441 (Burger, C.J., concurring); *United Steelworkers of Am. v. Ret. Income Plan For Hourly-Rated Employees of ASARCO, Inc.*, 512 F.3d 555, 565 (9th Cir. 2008).

The Court reviewed the entries Uber identified as vague. *See* Dkt. No. 187-6. It agrees as to the following entries:

Entry Description	Date of Entry	Claimed Time	Claimed Amount
Team phone call	1/8/2018	1.60	$752
Correspondence regarding proposed changes to settlement	1/17/2018	0.10	$47
Phone call with D. Kouniaris	1/19/2018	0.30	$141
Correspondence re meeting and conferring	1/25/2018	0.10	$47
Prepare Declaration and Exhibit	2/25/2018	0.90	$315
Team pre-meet and confer phone call	4/23/2018	1.00	$470

[5] In accompanying exhibits, Uber appears to argue that certain of Plaintiffs' counsel's billed hours were duplicative or clerical work in disguise. *See* Spurchise Decl. ¶ 8 & Ex. 3. Uber's opposition, however, does not challenge those hours. And, in any case, review of those entries does not suggest that they are duplicative or clerical.

Drafting declaration and gathering exhibits	6/5/2018	1.60	$752
Discuss next steps with team	10/11/2018	0.30	$105
Preparing for team call	10/18/2018	0.30	$141
Make stipulation accessible at the request of M. Riess	12/18/2018	0.20	$55
Total			**$2,825**

"Block billing" is "the time-keeping method by which each lawyer and legal assistant enters the total daily time spent working on a case, rather than itemizing the time expended on specific tasks." *Welch v. Metro. Life Ins. Co.*, 480 F.3d 942, 945 (9th Cir. 2007). Block billing is not per se unreasonable and "has been accepted in this district." *PQ Labs, Inc. v. Qi*, No. 12-cv-00450 CW, 2015 WL 224970, at *3 (N.D. Cal. Jan. 16, 2015) (*citing Stonebrae, L.P. v. Toll Bros., Inc.*, No. 08-cv-00221 EMC, 2011 WL 1334444, at *8 (N.D.Cal. Apr. 7, 2011) ("Block-billing is a typical practice in this district, and blocked-bills have been found to provide a sufficient basis for calculating a fee award.")). However, the block-billing party seeking fees must still meet the basic requirements of "listing his hours and identifying the general subject matter of his time expenditures." *Garcia v. Resurgent Capital Servs., L.P.*, No. 11-cv-01253 EMC, 2012 WL 3778852, at *8 (N.D. Cal. Aug. 30, 2012) (internal quotation marks and citation omitted). Otherwise, the trial court may reduce or outright deny the award. *Fischer v. SJN-P.D. Inc.*, 214 F.3d 1115, 1121 (9th Cir. 2000).

Here, the Court finds that the alleged block-billed entries "contain enough specificity as to individual tasks to ascertain whether the amount of time spent performing them was reasonable." *Garcia*, 2012 WL 3778852, at *8. Because the block-billed entries are adequately detailed to permit the Court to assess the reasonableness of hours expended, the Court finds that plaintiffs' counsel have sufficiently documented their hours; no reduction is necessary on this basis.

C. Motion to Seal

Plaintiffs move to seal two exhibits containing a chart and graph detailing the number of service-animal-related complaints received by Uber on a month-to-month basis. *See* Dkt. No. 189-5. Plaintiffs also seek to redact two portions of their reply referencing that information. *See* Dkt. No. 189-4 at 13. Notably, the information sought to be sealed are merely information derived from Uber's data reports, not the reports themselves.

Local Rule 79-5(e)(1) requires the party designating a document as confidential to "file a declaration as required by [Local Rule] 79-5(d)(1)(A) establishing that all of the designated material is sealable" within four days of the filing of the motion to seal. Local Rule 79-5(d)(1)(A) further explains that merely "[r]eferenc[ing] a stipulation or protective order that allows a party to designate certain documents as confidential is not sufficient to establish that a document, or portions thereof, are sealable." *See also Kamakana v. City & Cty. of Honolulu*, 447 F.3d 1172, 1179 (9th Cir. 2006) (listing grounds establishing "compelling reasons" to seal court files).

Plaintiffs filed their motion to seal and served their motion on Uber on August 30, 2019. *See* Dkt. Nos. 189, 191. Because more than four days have passed since Plaintiffs filed their motion and Uber has not filed a declaration explaining why the derived information contained in the exhibits or the reply is confidential, the Court DENIES the administrative motion to seal without prejudice. Plaintiffs must file the documents in the public record by **October 11, 2019**. *See* N.D. Cal. Local Rule 79-5(e)(2).

IV. Conclusion

The Court GRANTS Plaintiffs' motion for attorneys' fees and costs. Plaintiffs are entitled to $312,763.76 in attorneys' fees and $685.36 in costs for a total award of **$313,449.12**. Uber must pay the award within 14 days of this order.

The Court DENIES Plaintiffs' administrative motion to seal. Plaintiffs must file the documents in the public record by **October 11, 2019**.

/ / /

/ / /

IT IS SO ORDERED.

Dated: November 8, 2019

NATHANAEL M. COUSINS
United States Magistrate Judge

United States District Court
Northern District of California

EXHIBIT R

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

JESSE HERNANDEZ, et al.,

Plaintiffs,

v.

COUNTY OF MONTEREY, et al.,

Defendants.

Case No. 13-cv-02354-BLF

ORDER VACATING HEARING ON PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES; AND GRANTING MOTION

[ECF 640]

Plaintiffs move for an award of $150,000 in attorneys' fees and expenses for the period May 27, 2017 through May 26, 2018. The motion, which has been fully briefed, is appropriate for disposition without oral argument. *See* Civ. L.R. 7-1(b). The Court VACATES the May 16, 2016 hearing. The motion is GRANTED for the reasons discussed below.

I. BACKGROUND

This class action was filed in May 2013 on behalf of inmates housed at the Monterey County Jail ("Jail"), challenging the medical care, mental health care, safety, and disability access provided at the Jail. Compl., ECF 1. After substantial discovery, motion practice, and issuance of a preliminary injunction, the parties entered into a Settlement Agreement which required changes to Jail policies and practices. Settlement Agreement, Exh. A to Swearingen Decl., ECF 640-1. Magistrate Judge Paul S. Grewal, then assigned to the case, granted final approval of the class action settlement in an order issued August 18, 2015. Final Approval Order, ECF 494.

Among other things, the Settlement Agreement required Defendants to develop implementation plans in specific subject areas "for improvement of care, services, programs, and activities at the Jail." Settlement Agreement ¶ 31. Defendants County of Monterey ("County")

and California Forensic Medical Group ("CFMG") submitted proposed implementation plans. *See* County Implementation Plan, Exh. A to County's Motion for Approval, ECF 514; CFMG Implementation Plan, Exh. A to CFMG's Motion for Approval, ECF 532. Judge Grewal approved those plans in large part, although he required some modifications. Order Granting-In-Part Defendants' Motions for Approval of Implementation Plans, ECF 549. For example, while he found no fault with CFMG's proposal that a psychiatrist be employed on-site at the Jail forty hours per week, Judge Grewal found that the proposed implementation plans did not adequately address standards for use of telepsychiatry. *Id.* He ordered that "Defendants' implementation plans must have standards for when they can deviate from a typical in-person encounter and use telemedicine or telepsychiatry." *Id.* at 3.

The Settlement Agreement contemplates that Plaintiffs may incur fees and expenses in monitoring and enforcing Defendants' compliance. Under Paragraph 63 of the Settlement Agreement, Plaintiffs may petition the Court for: (a) no more than $250,000 per year in fees and expenses arising from monitoring work, inspections of the Jail, meet-and-confer, and the like, and (b) no more than $150,000 per year in fees and expenses arising from motions to enforce the Settlement Agreement. Settlement Agreement ¶ 63. The parties agree that for purposes of these provisions, the first monitoring year ran from May 27, 2016 through May 26, 2017. The second monitoring year – the year at issue here – ran from May 27, 2017 through May 26, 2018.

On July 17, 2017, Plaintiffs filed a motion to enforce the Settlement Agreement, asserting that: (a) CFMG had not complied with its staffing obligations under the Settlement Agreement; (b) CFMG's proposed Telepsychiatry Policy did not contain the standards required by Judge Grewal's order; and (c) the County had denied Class Counsel and court-appointed monitors access to inmates' records of treatment at Natividad Medical Center ("Natividad") which were necessary to confirm Defendants' compliance with the Settlement Agreement and related court orders. Motion to Enforce, ECF 599. The Court heard the motion on September 20, 2017. *See* Minute Entry, ECF 613. A number of issues were resolved on the record, and the Court indicated that it would refer certain outstanding issues to Magistrate Judge Cousins for resolution. Hrg. Tr., ECF 618.

The Court issued a written order on November 1, 2017. Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement, ECF 619. The Court found that "as of the filing of Plaintiffs' motion to enforce, CFMG was not in compliance with its obligation to employ a psychiatrist on-site at the Jail for forty hours per week." *Id*. at 2. The Court noted that after the motion to enforce was filed, CFMG hired Dr. Paul Francisco to work as a full-time on-site psychiatrist. *Id.* at 3. The Court accepted the oral representations of CFMG's counsel that there were substitute psychiatrists available to cover any absences of Dr. Francisco. *Id.* Thus, the Court concluded that the portions of the motion to enforce directed to CFMG's staffing obligations were moot. *Id.*

The Court observed that the parties had "agreed to work together" and had "reached tentative agreement" on the bulk of the telepsychiatry issues. Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement at 5, ECF 619. The Court referred the remaining telepsychiatry issues to Judge Cousins. *Id.* The proceedings before Judge Cousins resulted in stipulated resolution of the remaining telepsychiatry issues. Stipulation and Order Regarding Telepsychiatry, ECF 622; Second Stipulation and Order Regarding Telepsychiatry Issues, ECF 633.

Finally, the Court granted the requested access in inmates' Natividad medical records "subject to Plaintiffs' submission of particularized requests to the Court by means of stipulation and proposed order or administrative motion." Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement at 8, ECF 619.

Plaintiffs now seek attorneys' fees and expenses incurred in litigating the issues described above. Plaintiffs claim that they incurred $335,648 in fees and $12,594 in expenses, but they limit their request to the $150,000 annual cap on fees and expenses set forth in the Settlement Agreement.

II. DISCUSSION

Plaintiffs' motion is governed by Paragraph 63 of the Settlement Agreement, which provides in relevant part as follows:

> 63. Fees and expenses after Final Approval of Settlement Agreement:
>
> Plaintiffs may petition the Court for an award of no more than $250,000 per year in fees and expenses arising from monitoring work, inspections, negotiations, meet and confer processes, mediation, review of documents, and correspondence with class members, until termination of Court enforcement. . . . The $250,000 annual cap does not apply to (1) Plaintiffs' motions to enforce the Settlement Agreement and Implementation Plans; and (2) Plaintiffs' opposition to any motions filed by defendant(s) arising out of the Settlement Agreement and Implementation Plans. *The standard for Plaintiffs' eligibility for fees and expense arising from Plaintiffs' motions to the Court shall be that no fees and expenses shall be awarded unless the Court finds (1) that the motion or opposition was necessary to enforce substantial rights of the class* under the Eighth Amendment and Fourteenth Amendments to the United States Constitution, Article I, Sections 7 and 17 of California Constitution, the Americans with Disabilities Act, Rehabilitation Act, or California Government Code § 11135; *and, (2) that Plaintiffs attempted to resolve the matter and/or narrow the issues as much as possible by meeting and conferring with Defendants, taking full opportunity of recourse to the mediator before presenting the issues to the Court.* Defendants shall be eligible for an award of fees and costs from plaintiffs' private counsel, and *Plaintiffs shall receive none, in the event that the Court finds that Plaintiffs' motion was frivolous, unreasonable or groundless*, or that Plaintiffs continued to litigate it after it clearly became so. Furthermore, *Plaintiffs agree that they may not seek more than $150,000 each year in fees and expenses on motions to enforce the Settlement Agreement.*

Settlement Agreement ¶ 63 (emphasis added).

To summarize, the Settlement Agreement provides that the Court may award Plaintiffs up to $150,000 a year in attorneys' fees and expenses incurred in litigating a motion to enforce the Settlement Agreement if: (a) the motion was necessary to enforce substantial rights of the class under the Eighth and Fourteenth Amendments or other enumerated laws; (b) Plaintiffs attempted to resolve the issues through meet-and-confer and mediation prior to bringing an enforcement motion; and (c) the motion was not frivolous, unreasonable, or groundless.

CFMG argues that these standards are not met with respect to the portions of the motion seeking enforcement of CFMG's obligations relating to staffing and telepsychiatry. The County argues that these standards are not met with respect to the portions of the motion seeking access to patient's Natividad medical records.

A. CFMG's Staffing Obligations and Telepsychiatry Standards

The Court has no difficulty finding that the requisite standards are met with respect to the portions of the motion to enforce directed to CFMG's obligations. CFMG's arguments to the contrary are unpersuasive.

1. The Motion was Necessary to Enforce Substantial Rights of the Class

CFMG's obligations related to psychiatric staffing and appropriate telepsychiatry standards go to the heart of Plaintiffs' federal constitutional rights as litigated and settled in this action. CFMG does not argue otherwise. Instead, CFMG argues that Plaintiffs' motion to enforce was not necessary to enforce those rights and that, in fact, Plaintiffs did not prevail on or accomplish anything through their motion.

With respect to its staffing obligations, CFMG concedes that it was "out of compliance with the Implementation Plan requirement regarding providing 40 hours of onsite psychiatry when Plaintiffs' counsel filed their Motion to Enforce." CFMG's Opp. at 7, ECF 643. CFMG nonetheless argues that Plaintiff's motion to enforce the 40-hour requirement was unnecessary because "Plaintiffs' counsel knew CFMG had been diligently attempting to hire an onsite psychiatrist." *Id*. CFMG does not offer any evidence that Plaintiffs' counsel knew of, and reasonably could have relied on, CFMG's efforts to hire a psychiatrist to work onsite forty hours per week. To the contrary, based on evidence submitted by Plaintiffs, it appears that during the months prior to the filing of Plaintiffs' enforcement motion, CFMG was advocating for a policy that would permit telepsychiatry to be used as the primary mode of providing psychiatric services at the Jail. Swearingen Reply Decl. ¶ 2, ECF 645-1. Only after Plaintiffs filed their enforcement motion did CFMG hire Dr. Francisco to start work in September 2017, more than three months into the 2017-2018 monitoring year.

At the hearing on the enforcement motion, CFMG's counsel still appeared to be suggesting that telepsychiatry could take the place of in-person treatment in most respects and that failure to provide an onsite doctor for forty hours per week could be excused if telepsychiatry were available. *See* Hrg. Tr. 28:10 – 35:4, ECF 618. Plaintiffs requested clarification, which the Court provided in its order, that "CFMG must provide an on-site psychiatrist for forty hours per week, each and every week." Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement at 3, ECF 619. Because CFMG had brought itself into compliance with that requirement prior to the hearing on Plaintiffs' motion, however, the Court ruled that "the portion of Plaintiffs' motion seeking to enforce CFMG's staffing obligations is DENIED AS

MOOT." *Id.*

With respect to telepsychiatry, CFMG argues that Plaintiff was unsuccessful in persuading the Court to grant its proposed order imposing twelve separate standards. CFMG concedes that "[d]uring the hearing on Plaintiffs' Motion to Enforce, CFMG stipulated to some of the Telepsych standards requested by Plaintiffs' counsel." CFMG's Opp. at 7, ECF 643. However, CFMG argues that it already had agreed to those provisions before Plaintiffs filed the enforcement motion and that the motion therefore was unnecessary. CFMG does not offer any evidence showing that it previously had agreed to all of the provisions to which it stipulated at the hearing. At the start of the hearing, the Court commented on CFMG's proposed telepsychiatry policy, stating that "I don't think it complies in any way with the Settlement Agreement." Hrg. Tr. 5:4-6, ECF 618. The Court then stated that neither it nor Plaintiffs would be rewriting the policy and that the focus of the hearing would be on finding solutions. Hrg. Tr. 5:6-9. After a lengthy discussion with all counsel about telepsychiatry and other issues raised in the enforcement motion, the Court expressed the hope that counsel for Plaintiffs and counsel for CFMG could make progress if they discussed the issues, and broke for lunch. Hrg. Tr. 55:4-56:7. Upon return from the lunch break, counsel for Plaintiffs and counsel for CFMG announced that they had discussed the matter over lunch and that of the twelve standards requested by Plaintiffs, CFMG had agreed to six, including "Number 6, Number 7, 9, 10, 11, 12." Hrg. Tr. 57:3-16. The Court characterized that agreement as "substantial." Hrg. Tr. 57:7.

With respect to the remaining six standards requested by Plaintiffs, the Court found that Number 4 did not require an express order from the Court because the relief sought is mandated by the Americans with Disabilities Act, 42 U.S.C. § 12101 et seq., and Number 8 was subsumed Numbers 6 and 7. Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement at 5, ECF 619. The parties agreed to work out Number 5. *Id.* The Court referred the remaining three standards, Numbers 1, 2, and 3, to Judge Cousins for further proceedings, and denied as moot the remaining portions of the motion directed to telepsychiatry. *Id.* Prior to the hearing date set for Judge Cousins, the parties reached agreement on telepsychiatry standards. The parties ultimately submitted two stipulations and proposed orders, which were

approved by the Court, resolving the remaining issues related to telepsychiatry and establishing telepsychiatry standards. *See* Stipulation and Order Regarding Telepsychiatry, ECF 622; Second Stipulation and Order Regarding Telepsychiatry Issues, ECF 633.

On this record, the Court finds that Plaintiffs' motion to enforce was necessary to enforce substantial class rights. Prior to the filing of the motion, CFMG was not in compliance with its staffing obligations or its obligation to implement appropriate telepsychiatry standards. It is reasonable to infer that the motion prompted CFMG to hire expeditiously an onsite psychiatrist, and it certainly resulted in the Court's clarification of CFMG's obligation to maintain and onsite psychiatrist for forty hours a week, each and every week. Moreover, through litigating the motion, the parties reached agreement on telepsychiatry standards. CFMG argues that the standards it ultimately agreed to were the same standards it always had advocated. That position is not borne out by the record, which reflects that it was only after substantial discussion with the Court and with Plaintiffs' counsel during the hearing on the motion that CFMG agreed to six of Plaintiffs' proposed standards. Moreover, to the extent that Plaintiffs did not obtain everything they requested in the way of telepsychiatry standards, Plaintiffs did obtain substantial results which allowed for implementation of standards which both Plaintiffs and the Court found to be acceptable. Under these circumstances, the Court finds that Plaintiffs have satisfied the first requirement for a recovery of fees and expenses under Paragraph 63 of the Settlement Agreement. This finding is not undermined by the fact that CFMG brought itself into compliance with some aspects of the Settlement Agreement prior to the hearing, and that the parties ultimately stipulated to resolution. *See Balla v. Idaho*, 677 F.3d 910, 921 (9th Cir. 2012) (upholding district court's award of attorneys' fees and expenses under Prison Litigation Reform Act where inmate-plaintiffs' motion to enforce injunction re prison conditions was catalyst for state's compliance).

2. Plaintiffs Attempted to Resolve the Issues Before Filing the Motion

Plaintiffs present the declaration of their counsel, Van Swearingen, who states that before filing the enforcement motion Plaintiffs attempted to reach resolution through meet and confer efforts, and through presentation of the issues to Judge Cousins. Swearingen Decl. ¶ 5, ECF 640-1. CFMG does not dispute Mr. Swearingen's statement.

3. The Motion to Enforce was not Frivolous, Unreasonable, or Groundless

For the reasons discussed in part II.A.1 above, Plaintiffs' motion to enforce was not frivolous, unreasonable, or groundless. The motion was the catalyst for, or otherwise resulted in, CFMG's compliance with its obligations under the Settlement Agreement.

B. Access to Inmates' Medical Records at Natividad

Turning to Plaintiffs' motion for fees and expenses related to the portion of their enforcement motion seeking access to inmates' medical records, the Court agrees with the County that the motion for access to inmates' records was not a motion for "enforcement" of the Settlement Agreement as contemplated in Paragraph 63. As set forth above, the Settlement Agreement authorizes Plaintiffs to seek up to "$250,000 per year in fees and expenses arising from monitoring work, inspections, negotiations, meet and confer processes, mediation, review of documents, and correspondence with class members," and up to "$150,000 each year in fees and expenses on motions to enforce the Settlement Agreement." Settlement Agreement ¶ 63. The portions of the Settlement Agreement addressing access to inmate' medical records are those relating to designated monitors' access to facilities and records. *See, e.g.,* Settlement Agreement ¶¶ 39-41.

The Settlement Agreement expressly provides that monitors shall have "reasonable access" to records, including mental health records, "consistent with Defendants' obligations under Federal and State law, as those obligations have been modified by Court order." Settlement Agreement ¶ 40.c. As is reflected in Defendant County of Monterey's opposition to Plaintiffs' enforcement motion, the County did not dispute Plaintiffs' right to inmate records, only the appropriate mechanism for producing the records. *See* County's Opp. to Motion to Enforce at 3, ECF 605. The County's position was consistent with its view of the state laws protecting the privacy interests of the Plaintiff class. *See id.* After evaluating applicable laws, the Court determined that a balancing of the interests at stake favored production, but that it was not appropriate "to issue a blanket order directing Natividad to produce any and all records requested by Class Counsel or the monitors." Order Granting in Part and Denying in Part Plaintiffs' Motion to Enforce Settlement Agreement at 7, ECF 619. The Court implemented a streamlined process

under which Plaintiffs may submit particularized requests for access to medical records by means of stipulation or administrative motion. *See id.* at 7-8. In the Court's view, these issues properly related to "monitoring" Defendants' compliance with the Settlement Agreement rather than "enforcement" of that compliance. As a result, the Court concludes that fees and expenses for litigating access to inmates' medical records are not recoverable as fees and expenses incurred in seeking to "enforce" the Settlement Agreement.

C. An Award of $150,000 in Fees and Expenses is Appropriate

Plaintiffs have established that they are entitled to recover fees and expenses for those portions of the motion to enforce directed to CFMG's obligations. The Court next must determine whether an award in the requested amount of $150,000 is appropriate.

Plaintiffs have provided documentation showing that they expended more than 640 hours litigating the motion to enforce judgment, amounting to $335,648 at counsel's billing rates. Swearingen Decl. ¶¶ 22-27 & Exh. H, ECF 640-1. Defendants do not contest either the number of hours worked or the rates charged. The Court finds no reason to adjust the lodestar of $335,648. *See Kerr v. Screen Extras Guild, Inc.*, 526 F.2d 67, 70 (9th Cir. 1975) (enumerating the factors that may be considered in adjusting the lodestar amount). Plaintiffs incurred more than $12,594 in expenses related to the motion to enforce. Swearingen Decl. ¶ 27. Defendants do not contest those expenses. The Court thus finds that Plaintiffs reasonably incurred a total of $348,242 in fees and expenses in connection with their motion to enforce.

Approximately 90% of Plaintiffs' work on the motion to enforce related to CFMG's obligations. Swearingen Decl. Exh. E, ECF 640-1. Records demonstrate that 64.2 hours were devoted to the Natividad records access issue at a fee of $35,794.50. Thus, even excluding fees and expenses related to the County's production of inmates' medical records, Plaintiffs reasonably incurred more than $313,000 in seeking to enforce CFMG's compliance with the Settlement Agreement. Plaintiffs' showing is more than adequate to warrant an award of $150,000 in fees and expenses, which is the maximum permitted under the Settlement Agreement but less than half of counsel's lodestar. Plaintiffs' motion for an award of attorneys' fees and expenses in the amount of $150,000 for the period May 27, 2017 through May 26, 2018 is GRANTED.

Having concluded that Plaintiffs are entitled to $150,000 in fees and expenses under the Settlement Agreement, the Court need not reach Plaintiffs' alternative arguments that they are entitled to attorneys' fees under various federal and state statutes.

D. Interest

Plaintiffs request interest on the award of attorneys' fees and expenses, and they assert that interest should run from July 2, 2018, the date Plaintiffs asked Defendants to stipulate to $150,000 in enforcement fees for period May 27, 2017 through May 26, 2018. *See* Swearingen Decl. ¶ 9, ECF 640-1. The Settlement Agreement itself does not provide for interest on fees and expenses awarded under Paragraph 63. To the contrary, the plain language of the Settlement Agreement appears to contemplate a *total* award of $150,000 in connection with a motion to enforce.

Plaintiffs cite *Friend v. Kolodzieczak*, 72 F.3d 1386, 1391-92 (9th Cir. 1995), in support of their request for interest. In *Friend*, the Ninth Circuit held that when plaintiffs are awarded attorneys' fees under 42 U.S.C. § 1988, they are entitled to post-judgment interest running from "the date that entitlement to fees is secured, rather than from the date that the exact quantity of fees is set." *Id*. 1392. In *Friend*, the plaintiffs had been awarded attorneys' fees in an order issued in June 1990, but the amount of fees was set in a later order issued in July 1990. *Id.* The Ninth Circuit held that the plaintiffs were entitled to post-judgment interest running from the earlier June order. *Id. Friend* is distinguishable from the present case, in that Plaintiffs here are awarded fees and expenses under a provision of the Settlement Agreement and not under § 1988. Moreover, Plaintiffs' entitlement to the $150,000 in fees and expenses was not "secured" until the issuance of the present order. Plaintiffs have cited no legal authority supporting an award of interest on the contractual fees and expenses awarded in this case.

Accordingly, Plaintiffs' request for post-judgment interest is DENIED.

//

//

//

//

//

III. ORDER

(1) Plaintiffs' motion for an award of attorneys' fees and expenses in the amount of $150,000 for the period May 27, 2017 through May 26, 2018 is GRANTED; and

(2) Plaintiffs' request for post-judgment interest is DENIED.

Dated: May 1, 2019

BETH LABSON FREEMAN
United States District Judge

United States District Court
Northern District of California

EXHIBIT S

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

DAVID COLE, et al.,

Plaintiffs,

v.

COUNTY OF SANTA CLARA, et al.,

Defendants.

Case No. 16-CV-06594-LHK

ORDER GRANTING FINAL APPROVAL OF CLASS SETTLEMENT AND MOTION FOR ATTORNEYS' FEES

Re: Dkt. Nos. 74, 75

WHEREAS, Plaintiffs David Cole, Leroy Benjamin, Erasmo Flores, Jr., Robert Phillips, and Brandon Williams ("Plaintiffs") and Defendant County of Santa Clara ("Defendant" erroneously sued herein as County of Santa Clara Department of Correction, and the County of Santa Clara Office of the Sheriff) (collectively, "the Parties") have advised the Court that they have settled the above-captioned litigation (hereafter, "Litigation") and have memorialized the terms of their settlement in a settlement agreement ("Consent Decree"), which is attached to the Declaration of Lisa Ells in Support of the Joint Motion for Final Approval of Class Settlement as Exhibit 1, ECF No. 75-1;

WHEREAS, the Court granted preliminary approval of the parties' Consent Decree on December 7, 2018, finding that it "falls within the range of possible approval" and "is the product

of arm's-length, serious, informed and non-collusive negotiations between experienced and knowledgeable counsel who have actively prosecuted and defended this litigation," ECF No. 73;

WHEREAS, the Parties submitted their Joint Motion for Final Approval of Class Settlement on January 14, 2019 and jointly requested an order (1) finding the proposed Consent Decree's terms and conditions are fair, adequate, and reasonable; and (2) approving the Consent Decree, ECF No. 74;

WHEREAS, Plaintiff submitted their Motion for Attorneys' Fees and Costs on January 14, 2019, and attached the declarations of Lisa Ells, Stuart Seaborn, and Richard Pearl, ECF No. 75;

WHEREAS, the Court requested supplemental information regarding Plaintiffs' counsel's billing records and resumes on March 18, 2019 and March 19, 2019, ECF Nos. 81 & 82;

WHEREAS Plaintiff filed supplemental declarations of Lisa Ells and Stuart Seaborn in response to the Court's request for supplemental information on March 19, 2019, ECF Nos. 83 & 84;

WHEREAS, the Joint Motion for Final Approval of Class Settlement and the Motion for Attorneys' Fees and Costs came on for hearing before this Court on March 21, 2019; and

WHEREAS, the Court has considered the Joint Motion for Final Approval of Class Settlement, Plaintiffs' Motion for Attorneys' Fees and Costs, the proposed Consent Decree, and the arguments of counsel at the March 21, 2019 hearing;

NOW, THEREFORE, IT IS HEREBY ORDERED:

1. The Court finds that the Consent Decree is fair, adequate, reasonable, and free from collusion. *Lane v. Facebook, Inc.*, 696 F.3d 811, 819 (9th Cir. 2012) (noting district court's role in reviewing the substance of the settlement is solely to ensure that it is "fair, adequate, and free from collusion." (quoting *Hanlon v. Chrysler Corp.*, 150 F.3d 1011, 1027 (9th Cir. 1998)). It further appears that extensive evaluation of the merits has been conducted such that the attorneys for the Parties are able to reasonably evaluate their respective positions. It also appears to the Court that settlement at this time will avoid substantial additional costs to all Parties, as well as avoid the delay and the risks presented by further litigation regarding the issues addressed by the Consent

Decree. It further appears that the Consent Decree has been reached as the result of intensive, prolonged, serious, and non-collusive arms-length negotiations, including multiple in-person and telephonic settlement sessions. The Court therefore finds that all the relevant *Hanlon* factors weigh in favor of granting final approval in this case. *See Hanlon*, 150 F.3d 1011 at 1026.

2. The Court finds that the distribution of notice by all Parties was done in a manner and form consistent with the Court's December 7, 2018 Order and the Court's January 30, 2019 Order extending the objection deadline, ECF Nos. 73 & 79, and meets the requirements of both due process and Rule 23 of the Federal Rules of Civil Procedure.

3. The Court finds that the Consent Decree satisfies the requirements of 18 U.S.C. § 3626(a)(1)(A) in that it is narrowly drawn, extends no further than necessary to correct the violation of the Federal right, and is the least intrusive means necessary to correct the violation of the Federal rights of Plaintiffs and the Plaintiff Class.

4. The Parties' Consent Decree is granted final approval pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, is incorporated by reference, and has the full force and effect of an order of this Court. Pursuant to Section IX of the Consent Decree, the Court retains jurisdiction to enforce the terms of the Consent Decree and to resolve disputes regarding compliance with the Consent Decree, subject to the limitations contained within the Consent Decree.

5. This is a class action certified pursuant to Federal Rule of Civil Procedure 23(b)(2) and the Court may award attorneys' fees and costs to class counsel pursuant to Federal Rule of Civil Procedure 23(h).

6. Plaintiffs are "prevailing parties" under the federal fee shifting statutes 42 U.S.C § 1983, 42 U.S.C. § 12205, and 29 U.S.C. § 794a(b). Plaintiffs are also successful litigants under California's private attorney general statute, Cal. Code Civ. Proc. § 1021.5. An award of attorney fees is appropriate under both Section 1021.5 and the separate fee-shifting statutes.

7. Plaintiffs are represented by counsel at Rosen Bien Galvan & Grunfeld LLP ("RBGG") and Disability Rights Advocates ("DRA"). The requested 2018 rates for Plaintiffs' counsel – $650 per hour for RBGG Partner Lisa Ells, $525 per hour for RBGG Associate Kara

Janssen, $375 per hour for RBGG Associate Marc Shinn-Krantz, $340 per hour for RBGG Senior Paralegal Karen Stilber, $225 per hour for RBGG Paralegal Hanna Wallace and former RBGG Paralegal Sara Long, $775 per hour for DRA Managing Director of Litigation Stuart Seaborn, $655 for DRA's Former Director of Litigation Mary-Lee Smith, $425 for DRA Staff Attorney Michelle Iorio, and $230 for DRA Paralegals Carly Schaaf, Jaqueline U, and Jessica Flores – are reasonable and appropriate for their work in this litigation. The rates sought here are in line with the market rates prevailing in the San Francisco Bay Area for work of similar complexity by lawyers of similar skills and experience. Plaintiffs' counsel possess a significant amount of experience and expertise in disability rights, prisoners' rights, and complex class actions, which they utilized in this case to secure exceptional results.

8. The time Plaintiffs' counsel expended on this case was appropriate given the length, intensity, and nature of the litigation. Plaintiffs' counsel effectively and efficiently litigated this case. Legal work was allocated between and among Plaintiffs' counsel to ensure work was performed effectively and efficiently utilizing the expertise of each organization. In calculating their lodestar, Plaintiffs have written off a total of approximately 10% of billable hours to date. The Court finds these billing judgment reductions to be reasonable and appropriate, in that they assure that Plaintiffs' counsel have accounted for any undue duplication of effort or inefficiency.

9. From July 1, 2016 through March 18, 2019, DRA worked 1259.8 hours total and RBGG worked 1737.3 hours total. DRA wrote off 82.1 hours to claim 1177.7 hours, and RBGG wrote off 233.8 hours to claim 1503.5 hours. Therefore, the total hours claimed by Plaintiffs' counsel are 2681.2 hours.

10. After reasonable billing judgment reductions, Plaintiffs' lodestar for work performed from July 1, 2016 through March 18, 2019 is $1,477,123.50, representing compensation for 2681.2 hours of work invested in this case.

11. Plaintiffs' counsel is entitled to recover the costs advanced to prosecute this litigation on behalf of the class. Plaintiffs have incurred costs of $14,860.53.

12. Accordingly, the Court finds that Plaintiffs' counsel's total lodestar plus expenses

from July 1, 2016 through March 18, 2019 of $1,477,123.50 is reasonable and appropriate under federal and state law for the work performed and the success achieved for the class. This amount far exceeds the negotiated amount of $1 million provided for attorneys' fees and costs through the effective date of the Consent Decree pursuant to Section VI(A) of the Consent Decree. The Consent Decree's effective date is the date this Court grants final approval of this class action settlement.

13. Defendant is ordered to pay Plaintiffs $1 million for reasonable attorneys' fees and costs. Payment shall be made in a manner consistent with the parties' negotiated language in Section VI of the Consent Decree.

14. Attorneys are entitled to recover fees for time spent monitoring and enforcing compliance with settlement agreements in civil rights lawsuits. Monitoring work is compensable even if it does not result in additional judicial relief. Accordingly, Plaintiffs are entitled to attorneys' fees and costs for implementation and monitoring of the Consent Decree.

15. The agreed-upon monitoring process for this case is appropriate and necessarily robust. The Consent Decree details extensive monitoring work to be performed by Plaintiffs' counsel, including work required to implement policies required by the Consent Decree. The parties have negotiated that such work, plus any enforcement work that proves necessary subject to the narrow exceptions specified at Section VI(B)(2) of the Consent Decree, will be fully compensated by a fixed payment of $2.2 million for attorneys' fees and costs incurred or attributable to any and all work performed from the effective date of the Consent Decree up through the term as defined in Section VIII of the Consent Decree.

16. Defendant is ordered to pay Plaintiffs $2.2 million for reasonable attorneys' fees and costs for work performed from the effective date of the Consent Decree up through the term as defined in Section VIII of the Consent Decree. The Consent Decree Term is twelve months after the certificate of occupancy for the new jail has been issued and the Country has begun placement of inmates in the new jail. The new jail is expected to be constructed by mid-2023, which is four-and-a-half years from today. With likely delays in construction, the parties anticipate that the $2.2

million will cover Plaintiffs' counsel's reasonable attorneys' fees and costs for worked performed over the next five-and-a-half years. Payment shall be made in a manner consistent with the parties' negotiated language in Section VI of the Consent Decree. Specifically, the $2.2 million shall be paid into the Cole Jail Monitoring Qualified Settlement Fund ("QSF"). Plaintiffs' counsel may not seek payment out of the QSF until monitoring and enforcement work is actually performed and must substantiate any request for disbursement from the QSF with records detailing the fees and costs incurred for which compensation is being sought.

IT IS SO ORDERED.

Dated: March 21, 2019

Lucy H. Koh

LUCY H. KOH
United States District Judge

United States District Court
Northern District of California

EXHIBIT T

14861364

GAY CROSTHWAIT GRUNFELD – 121944
JENNY S. YELIN – 273601
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, California 94105-2235
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com

JENNIFER LIU – 279370
ASHLEY PELLOUCHOUD – 286049
THE LIU LAW FIRM, P.C.
1390 Market Street, Suite 200
San Francisco, California 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
Email: jliu@liulawpc.com
ap@liulawpc.com

Attorneys for Plaintiff and the Settlement Class

FILED
ALAMEDA COUNTY
FEB 15 2017
CLERK OF THE SUPERIOR COURT
By Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

MATTHEW SUNNER, on behalf of himself and others similarly situated,

Plaintiff,

v.

KENNETH R. TURNAGE II GENERAL CONTRACTOR, INC., d/b/a K2GC, INC.; KENNETH R. TURNAGE II; and DOES 1-10,

Defendants.

Case No. RG15772244

ASSIGNED FOR ALL PURPOSES TO:
JUDGE GEORGE HERNANDEZ
DEPARTMENT 17

COMPLEX CASE; CLASS ACTION

[PROPOSED] ORDER GRANTING MOTION FOR CLASS REPRESENTATIVE SERVICE AWARD AND ATTORNEY'S FEES AND COSTS

Judge: Hon. George Hernandez
Date: February 15, 2017
Time: 2:30 p.m.
Dept.: 17
Reservation No.: ~~1792476~~ 1822643
Action Filed: May 29, 2015
Trial Date: None Set

Received FEB 01 2017

Plaintiff's Motion for Class Representative Service Award and Attorney's Fees and Costs came on for hearing before this Court on February 15, 2017. The Court having considered the pleadings on the motion, the Joint Stipulation of Settlement and Release ("Settlement Agreement"), attached as Exhibit A to the Declaration of Gay Crosthwait Grunfeld in Support of Motion for Final Approval of Class Action Settlement and Motion for Class Representative Service Award and Attorney's Fees and Costs, oral argument at the hearing, and the record in this case, and good cause appearing, hereby ORDERS as follows:

1. A service award is justified in this case in light of the efforts of Class Representative Matthew Sunner to advance the litigation and the interests of the Class. Mr. Sunner has fairly and adequately represented and protected the interests of the Class.

2. Attorney's Fees equal to one-third of the settlement fund ($99,000) are reasonable and justified in this case, due to the risks inherent in the case, the contingent nature of the fee arrangement, the skill of Class Counsel, and the efforts of Class Counsel to litigate the case effectively and pursue a settlement for the Class.

3. The costs advanced by Class Counsel were reasonably incurred in pursuit of the litigation.

4. The Court ORDERS that the following award, fees and costs are reasonable and should be paid pursuant to the schedule set forth in the Order Granting Motion for Final Approval of Class Action Settlement and the Settlement Agreement:

a. $10,000 to Class Representative Matthew Sunner as a service award;

b. $99,000 to The Liu Law Firm, P.C. and Rosen Bien Galvan & Grunfeld LLP for attorney's fees; and

///

///

///

///

///

c. $13,283.87 jointly to Class Counsel for litigation costs.

IT IS SO ORDERED.

DATED: 2/15, 2017

George Hernandez
Judge of the Superior Court

GAY CROSTHWAIT GRUNFELD – 121944
JENNY S. YELIN – 273601
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, California 94105-2235
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com

JENNIFER LIU – 279370
ASHLEY PELLOUCHOUD – 286049
THE LIU LAW FIRM, P.C.
1390 Market Street, Suite 200
San Francisco, California 94102
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
Email: jliu@liulawpc.com
ap@liulawpc.com

Attorneys for Plaintiff and the Settlement Class

ENDORSED
FILED
ALAMEDA COUNTY
JAN 31 2017
CLERK OF THE SUPERIOR COURT
By: ERICA BAKER, Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ALAMEDA

MATTHEW SUNNER, on behalf of himself and others similarly situated,

Plaintiff,

v.

KENNETH R. TURNAGE II GENERAL CONTRACTOR, INC., d/b/a K2GC, INC.; KENNETH R. TURNAGE II; and DOES 1-10,

Defendants.

Case No. RG15772244

ASSIGNED FOR ALL PURPOSES TO: JUDGE GEORGE HERNANDEZ DEPARTMENT 17

COMPLEX CASE; CLASS ACTION

DECLARATION OF GAY CROSTHWAIT GRUNFELD IN SUPPORT OF MOTION FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT AND MOTION FOR CLASS REPRESENTATIVE SERVICE AWARD AND ATTORNEY'S FEES AND COSTS

Judge: Hon. George Hernandez
Date: February 15, 2017
Time: 2:30 p.m.
Dept.: 17
Reservation No.: 1792476
Action Filed: May 29, 2015
Trial Date: None Set

Timekeeper	Position	Class	Hours	2017 Rate/Hour	Total
Gay C. Grunfeld	Partner	1984	100.4	$825	$82,830.00
Aaron Fischer	Former Associate	2006	49.2	$625	$30,750.00
Blake Thompson	Former Associate	2007	106.8	$600	$64,080.00
Margot Mendelson	Former Associate	2009	2.8	$515	$1,442.00
Jenny Yelin	Associate	2010	273.3	$500	$136,650.00
Christopher Hu	Associate	2013	3.4	425	$1,445.00
Linda Woo	Paralegal	N/A	103	$325	$33,475.00
F. Gail LaPuria	Paralegal	N/A	18.7	$275	$5,142.50
Total			**657.6**		**$355,814.50**

27. The amount sought in fees, 33 1/3% of the common fund, or $99,000, is only 28% of our firm's lodestar. With LLF's fees included, it is a much smaller percentage.

28. Our firm has been actively involved in every stage of the case since we joined as co-counsel shortly after the complaint was filed in June 2015. The 657.6 hours claimed includes the work we did on some of the most significant, time-intensive portions of this case: drafting discovery requests, including discovery directed to Defendants as well as third-parties; reviewing documents produced in response to those discovery requests; meeting and conferring repeatedly with Defendants regarding their inadequate discovery responses; researching and drafting the mediation statement, preparing for mediation, and conducting a nearly-full day mediation with Michael Loeb in December 2015; preparing for and taking the deposition of K2GC's Person Most Qualified, Kenneth R. Turnage; interviewing witnesses and obtaining declarations in support of the class certification motion; drafting the class certification motion, which we filed in February 2016, just nine months after the case was filed; negotiating the settlement in the case; preparing the Motion for Preliminary Approval of the settlement; overseeing the Class Notice process; and drafting the instant Motions for Final Approval and for a Class Representative Service Award and Attorney's Fees and Costs.

29. We expect to spend significant time continuing our work on this case after the filing of this motion, including preparing for the Final Fairness Hearing on February

EXHIBIT U

GAY CROSTHWAIT GRUNFELD – 121944
JENNY S. YELIN – 273601
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, California 94105-2235
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com

JENNIFER LIU – 279370
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, California 94102-4991
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
Email: jliu@liulawpc.com

Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JAIMIE QUINBY, LINDA GOMES, and ERIC FONTES, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

ULTA SALON, COSMETICS & FRAGRANCE, INC.,

Defendant.

Case No. CV-15-4099 WHO

ORDER GRANTING MOTION FOR CLASS REPRESENTATIVE SERVICE AWARDS AND ATTORNEYS' FEES AND COSTS

Judge: Hon. William H. Orrick
Date: January 18, 2017
Time: 2:00 p.m.
Crtrm.: 2, 17th Floor

Trial Date: None Set

On January 18, 2017, this Court conducted the Final Fairness Hearing, with Rosen Bien Galvan & Grunfeld LLP and The Liu Law Firm, P.C. ("Plaintiffs' Counsel") appearing as counsel for Plaintiffs JAIMIE QUINBY, ERIC FONTES, and LINDA GOMES ("Plaintiffs" or "Class Representatives"), and Littler Mendelson, P.C. appearing as counsel for Defendant ULTA SALON, COSMETICS & FRAGRANCE, INC. ("Defendant"). Based upon the Court's review of Plaintiffs' Motion for Class Representative Service Awards and Attorneys' Fees and Costs, the Memorandum of Points and Authorities in Support Thereof, the Declarations of Jennifer Liu ("Liu Declaration"), Gay Crosthwait Grunfeld ("Grunfeld Declaration"), Jaimie Quinby, Eric Fontes, and Linda Gomes, and the exhibits thereto, the Court finds:

1. Service award payments are justified where the class representatives expend extraordinary effort, bear personal hardship, and risk their current and future livelihood to remedy unfair practices for the benefit of the class. *See Van Vranken v. Atlantic Richfield Co*., 901 F. Supp. 294, 299 (N.D. Cal. 1995). The Court finds that the service awards are justified here in light of the efforts of Class Representatives Jaimie Quinby, Eric Fontes, and Linda Gomes to advance the litigation and the interests of the class.

2. "[A] litigant or a lawyer who recovers a common fund for the benefit of persons other than himself or his client is entitled to a reasonable attorney's fee from the fund as a whole." *Boeing Co. v. Van Gemert*, 444 U.S. 472, 478 (1980). Courts are directed to "take into account all of the circumstances of the case" when determining what fees to approve (*Vizcaino v. Microsoft Corp*., 290 F.3d 1043, 1048 (9th Cir. 2002)), with "[r]easonableness [being] the goal." *Fischel v. Equitable Life Assurance Soc'y of the U.S.,* 307 F.3d 997, 1007 (9th Cir. 2002). The Court finds that the factors used to assess reasonableness—primary among them, the value of the monetary secured for the class—support the requested fee award of $912,500, equal to 25% of the settlement amount of $3,650,000. The Court further finds that the costs advanced by Class Counsel were reasonably incurred in pursuit of the litigation.

3. The Class Representatives and Plaintiffs' Counsel have fairly and adequately

represented and protected the interests of the class.

4. The Court therefore ORDERS that the following class representative service awards, attorney's fees, and costs are reasonable:

a. $10,000 each to Jaimie Quinby, Eric Fontes, and Linda Gomes as service awards;

b. $912,500 jointly to The Liu Law Firm, P.C. and Rosen Bien Galvan & Grunfeld LLP for reasonable attorneys' fees; and

c. $11,384.67 jointly to Class Counsel for litigation costs.

5. These amounts are to be paid if the Court grants final approval to the settlement according to the schedule in the Joint Stipulation of Settlement and Release, Exhibit A to the Declaration of Gay Crosthwait Grunfeld in support of the Motion for Class Representative Service Awards and Attorneys' Fees and Costs or as directed in the Court's Order Granting Final Approval to the Class Action Settlement.

IT IS SO ORDERED.

DATED: January 18, 2017

William H. Orrick
Judge of the United States District Court

GAY CROSTHWAIT GRUNFELD – 121944
JENNY S. YELIN – 273601
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, California 94105-2235
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: ggrunfeld@rbgg.com
jyelin@rbgg.com

JENNIFER LIU – 279370
THE LIU LAW FIRM, P.C.
1170 Market Street, Suite 700
San Francisco, California 94102-4991
Telephone: (415) 896-4260
Facsimile: (415) 231-0011
Email: jliu@liulawpc.com

Attorneys for Plaintiffs and the Proposed Class

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JAIMIE QUINBY, LINDA GOMES, and ERIC FONTES, on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

ULTA SALON, COSMETICS & FRAGRANCE, INC.,

Defendant.

Case No. CV-15-4099 WHO

DECLARATION OF GAY CROSTHWAIT GRUNFELD IN SUPPORT OF MOTION FOR CLASS REPRESENTATIVE SERVICE AWARDS AND ATTORNEY'S FEES AND COSTS

Judge: Hon. William H. Orrick
Date: January 18, 2017
Time: 2:00 p.m.
Crtrm.: 2, 17th Floor

Trial Date: None Set

Timekeeper	Position	Class	Hours	2016 Rate/Hour	Total
Gay C. Grunfeld	Partner	1984	110.6	$790	$87,374.00
Jenny S. Yelin	Associate	2010	178.3	$475	$84,692.50
Andrew Spore	Associate	2015	21.2	$380	$8,056.00
Other Attorneys	N/A	N/A	20.8	N/A	$11,889.00
Linda Woo	Paralegal	N/A	38.9	$300	$11,670.00
Other Paralegals	Paralegal	N/A	4.5	N/A	$1,224.00
Total			374.3		$204,905.50

26. Our current lodestar amount of $204,905.50, combined with LLF's lodestar of $296,915.00, results in a total lodestar amount of $501,821.00 for Plaintiffs' counsel. The amount sought in fees, 25% of the common fund, or $912,500, would result in a multiplier of 1.82 based on work through November 11, 2016. I believe that the excellent results achieved in this case, coupled with the efficiency with which we reached a settlement with the Defendants, justify this modest multiplier.

27. We expect to spend significant time continuing our work on this case after the filing of this motion, including preparing and filing the Motion for Final Approval, preparing for the Final Fairness Hearing on January 18, 2017, communicating with class members and the Settlement Administrator, and negotiating with Defendants regarding the timing and details of the final distribution of funds. As discussed in more detail below, we will likely spend at least 55 additional hours on this case in the future, so our total amount of fees is likely to be at least $233,603.17.

28. A summary of the key work done and hours incurred by RBGG at each stage of the litigation is set forth below. Upon request, I could submit RBGG's individual, itemized billing records for the Court's review.

EXHIBIT V

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

NATIONAL FEDERATION OF THE BLIND OF CALIFORNIA, et al.,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

Case No. 14-cv-04086 NC

ORDER GRANTING FINAL APPROVAL AND ATTORNEYS' FEES

Re: Dkt. Nos. 119, 128

In September 2014, the National Federation of the Blind of California and three individuals sued Uber and its California subsidiaries, alleging that Uber violates state and federal law by discriminating against blind persons when Uber drivers refuse to transport service dogs. In April 2015, this Court denied Uber's motion to dismiss the complaint and found that NFB-CA had associational standing and that Uber is subject to the ADA. The parties then began preparing for trial, while also engaging in settlement discussions.

In January 2016, the parties notified the Court that they had a settlement in principle, so the Court granted their request to vacate the deadlines in the case. In late April 2016, the parties requested preliminary approval of their class action settlement. The Court granted preliminary approval, and the parties now seek final approval of the settlement. In addition, plaintiffs move for $1,589,574 in attorneys' fees and $13,447.14 in costs, with a multiplier of 2.0. Uber agrees that plaintiffs can recover attorneys' fees, but disputes the reasonableness of the fees and costs. The Court held a hearing on the

motions on December 1, 2016, and granted both the motion for final approval and the motion for attorneys' fees.

As to the final approval of the settlement, the parties reported that no objections to the settlement were received. In its order granting preliminary approval of the settlement, the Court summarized the settlement's key components and analyzed the fairness of settlement in detail. Dkt. No. 112. The Court now concludes that the settlement is fair, adequate, and reasonable and GRANTS the motion for final approval of the class action settlement. The Court retains jurisdiction over the settlement for the duration of the settlement agreement. *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 378 (1994).

As to the attorneys' fees request, Uber does not dispute plaintiffs' entitlement to attorneys' fees. Thus, the Court considers (1) the reasonableness of the attorneys' fees, and (2) the appropriate multiplier.

Plaintiffs request $1,589,574 in attorneys' fees. The "lodestar is the product of reasonable hours times a reasonable rate." *City of Burlington v. Dague*, 505 U.S. 557, 559 (1992). Uber objects to (1) the attorneys' hourly rate; (2) duplicative work done by multiple attorneys in attending hearings and conference calls, and (3) plaintiffs' trial preparation after settlement negotiations had begun.

First, the Court finds that plaintiffs have cited sufficient authority that the rates requested have been awarded in this district and are considered reasonable in the San Francisco Bay Area market.

Second, the Court finds that plaintiffs' counsel have not unnecessarily duplicated work by structuring their team to have multiple attorneys consulted at key times in the case. *See Nat'l Fed'n of the Blind v. Target Corp.*, No. 06-cv-01802 MHP, 2009 WL 2390261, at *3 (N.D. Cal. Aug. 3, 2009) ("the court may not condition fees on plaintiffs' counsel's conformance to the typical commercial law firm's pyramidal staffing structure.").

Third, the parties moved to vacate trial deadlines in January, and the Court made

clear for the following four months that trial dates would be reinstated if a settlement was not promptly entered. Under those circumstances, the Court finds it reasonable that plaintiffs' counsel continued to prepare for trial after January and even until April when a final settlement was entered on the docket. Considering all arguments, the Court concludes that plaintiffs' request for fees and costs are reasonable and GRANTS the motion.

In addition to reasonable attorneys' fees, plaintiffs request a multiplier of 2.0 under California law. A multiplier is permitted under California law to allow plaintiffs to be compensated for the real market value of their work, which includes a certain amount of risk absorbed by counsel when working on contingency. *See Ketchum v. Moses*, 24 Cal. 4th 1122, 1136 (2001) ("The experience of the marketplace indicates that lawyers generally will not provide legal representation on a contingent basis unless they receive a premium for taking that risk.").

The Court considers the most analogous case cited by the parties: *Nat'l Fed'n of the Blind v. Target Corp.*, No. 06-cv-01802 MHP, 2009 WL 2390261 (N.D. Cal. Aug. 3, 2009). In *Target*, plaintiffs sought to make Target's online platform accessible to blind web users. *Id*. at *1. There, Judge Patel found that a 1.65 multiplier was appropriate in a case with significant motion practice, including contested motions to dismiss, for preliminary injunction, class certification, and summary judgment. *Id*. at *9.

In this case, the Court finds that plaintiffs' sought to enhance Uber's policies to protect blind riders, which can provide a model for other businesses in the sharing economy. Additionally, plaintiffs faced a significant hurdle in overcoming the motion to dismiss, and took on the risk associated with raising novel legal issues in complex areas of jurisdictional, employment, and discrimination law. Thus, the Court finds that here, a multiplier of 1.5 is appropriate to fully award plaintiffs for the fair market value of their work in taking on this case.

Plaintiffs must submit an updated proposed order as to the requested fees and costs for the Court's signature in accordance with this order by December 12, 2016.

IT IS SO ORDERED.

Dated: December 6, 2016

NATHANAEL M. COUSINS
United States Magistrate Judge

United States District Court
Northern District of California

EXHIBIT W

United States District Court
Northern District of California

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JESSE HERNANDEZ, et al.,

Plaintiffs,

v.

COUNTY OF MONTEREY, et al.,

Defendants.

Case No. 5:13-cv-02354-PSG

ORDER GRANTING ATTORNEY'S FEES AND EXPENSES

(Re: Docket No. 500)

Counsel for Plaintiffs Jesse Hernandez and all others similarly situated moves for an award of $4.8 million for their reasonable attorney's fees and expenses,[1] as agreed by the parties in the Settlement Agreement.[2] Defendants do not oppose: while Defendants initially objected to Plaintiffs' request for interest,[3] the parties successfully met, conferred and resolved the issue without the court's intervention.[4]

The court GRANTS as unopposed Plaintiffs' motion for $4.8 million for reasonable attorney's fees and expenses. The question of interest is resolved according to the parties' stipulation.[5]

[1] *See* Docket No. 500.

[2] *See* Docket No. 494 at ¶¶ 60-65.

[3] *See* Docket Nos. 501, 502.

[4] *See* Docket No. 508.

[5] *See id.*

SO ORDERED.

Dated: November 9, 2015

PAUL S. GREWAL
United States Magistrate Judge

United States District Court
Northern District of California

MICHAEL W. BIEN – 096891
ERNEST GALVAN – 196065
GAY C. GRUNFELD – 121944
VAN SWEARINGEN – 259809
MICHAEL FREEDMAN – 262850
KRISTA STONE-MANISTA – 269083
SARAH P. ALEXANDER – 291080
ROSEN BIEN
GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, California 94105
Telephone: (415) 433-6830
Facsimile: (415) 433-7104
Email: mbien@rbgg.com
egalvan@rbgg.com
ggrunfeld@rbgg.com
vswearingen@rbgg.com
mfreedman@rbgg.com
kstone-manista@rbgg.com
spalexander@rbgg.com

ALAN SCHLOSSER – 049957
MICAELA DAVIS – 282195
AMERICAN CIVIL LIBERTIES UNION FOUNDATION OF NORTHERN CALIFORNIA, INC.
39 Drumm Street
San Francisco, California 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 255-8437
Email: aschlosser@aclunc.org
mdavis@aclunc.org

JAMES EGAR – 065702
Public Defender
DONALD E. LANDIS, JR. – 149006
Assistant Public Defender
OFFICE OF THE PUBLIC DEFENDER
COUNTY OF MONTEREY
111 West Alisal Street
Salinas, California 93901-2644
Telephone: (831) 755-5806
Facsimile: (831) 755-5873
Email: EgarJS@co.monterey.ca.us
LandisDE@co.monterey.ca.us

ERIC BALABAN (*admitted pro hac vice*)
CARL TAKEI – 256229
NATIONAL PRISON PROJECT of the AMERICAN CIVIL LIBERTIES UNION
915 15th Street N.W., 7th Floor
Washington, D.C. 20005-2302
Telephone: (202) 393-4930
Facsimile: (202) 393-4931
Email: ebalaban@npp-aclu.org
ctakei@npp-aclu.org

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

JESSE HERNANDEZ et al., on behalf of themselves and all others similarly situated,

Plaintiffs,

v.

COUNTY OF MONTEREY; MONTEREY COUNTY SHERIFF'S OFFICE; CALIFORNIA FORENSIC MEDICAL GROUP, INCORPORATED, a California corporation; and DOES 1 to 20, inclusive,

Defendants.

Case No. CV 13 2354 PSG

DECLARATION OF MICHAEL W. BIEN IN SUPPORT OF PLAINTIFFS' MOTION FOR ATTORNEYS' FEES AND EXPENSES

Judge: Hon. Paul S. Grewal
Date: November 10, 2015
Time: 10:00 a.m.
Crtrm.: 5, 4th Floor

I, Michael W. Bien, declare:

1. I am an attorney admitted to practice law in California, a member of the bar of this Court, and a partner in the law firm of Rosen Bien Galvan & Grunfeld LLP ("RBGG"), counsel of record for Plaintiffs. I have personal knowledge of the matters set forth herein, and if called as a witness I could competently so testify. I make this declaration in support of Plaintiffs' Motion for Attorneys' Fees and Expenses.

MY RELEVANT PROFESSIONAL BACKGROUND

2. Upon graduation from Northwestern University School of Law in 1980, I joined the law firm of Brobeck, Phleger & Harrison as a litigation associate. I was elected to partnership at Brobeck in 1987. In December 1990, I left Brobeck and formed the law firm, Rosen, Bien & Asaro (which became Rosen, Bien, Galvan & Grunfeld in 2012), where I am now managing partner. I have worked exclusively in litigation throughout my career. The vast majority of my time has been spent on complex litigation in the state and federal courts, usually involving issues of state and federal antitrust laws, RICO, class actions, unfair competition, civil rights (including prisoner class actions), intellectual property, attorneys' fees or banking law. I have received numerous awards and instances of peer recognition for my litigation work, including but not limited to, Martindale Hubble A-V rating, repeated selection for the Northern California "Super Lawyer" list in Civil Rights, First Amendment, and Business Litigation, and a 2010 CLAY Award. I have been named by the San Francisco and Los Angeles *Daily Journal* to its list of the Top 100 Lawyers in California several times, including this year. I have been recognized by *Best Lawyers in America* for Commercial Litigation since 2013. A true and correct copy of my resume is attached hereto as **Exhibit A**.

3. I have been lead or co-lead counsel in numerous major cases representing a prisoner or classes of prisoners in civil rights actions, including *Brown v. Plata*, 131 S. Ct. 1910, 179 L. Ed. 2d 969 (2011). In each of these cases, I have represented prisoners or classes of prisoners with special needs or vulnerabilities: mental illness, mental retardation, mobility, vision, hearing, learning and developmental disabilities, and victims of sexual

assaults. I also have extensive experience in attorneys' fees litigation. My experience in attorneys' fees litigation includes negotiation, mediation, law and motion, evidentiary hearing, and trial and appellate work in both state and federal courts. I have served as lead counsel or specially retained fees counsel and have been an expert witness on numerous attorneys' fees issues, including hourly rates, billing, and staffing practices.

4. I have become familiar with the rates charged and the billing and work practices of lawyers in California and the nation in many ways: (1) as a billing partner negotiating rates and discussing bills for legal representation with individual and corporate clients; (2) from my own considerable involvement in attorneys' fees litigation and expert consultations and testimony; (3) by discussing attorneys' fees, billing, and work practices with other attorneys; (4) by representing other attorneys seeking fees; (5) by obtaining declarations from other attorneys regarding market rates, attorneys' fees, billing and work practices; (6) by reviewing surveys, legal newspapers, reported decisions, and treatises regarding prevailing attorneys' rates, fees, billing and work practices; (7) by reviewing attorneys' fees applications and awards in other cases, as well as unpublished decisions; (8) by reviewing rates charged by, and billing and work practices of, other firms that my firm has retained or associated with; and (9) by conducting research in my preparation for testimony as an expert.

PLAINTIFFS' COUNSEL HAVE EXTENSIVE EXPERIENCE IN PRISONER CLASS ACTION LITIGATION AND THE WORK EXPENDED WAS REASONABLE AND NECESSARY FOR THE PROSECUTION OF THIS CASE

5. The attorneys from a private law firm (RBGG), a government agency (the Monterey County Public Defender's Office), and two non-profit organizations (the American Civil Liberties Union Foundation of Northern California and the American Civil Liberties Union – National Prison Project) (collectively, "Plaintiffs' counsel") working on this case on behalf of the Plaintiff class and subclass bring to bear an extraordinary amount of experience and expertise in prisoners' rights and class action litigation. *See also* Declarations of Alan Schlosser and Eric Balaban in Support of Plaintiffs Motion for Attorneys' Fees and Expenses, filed herewith. Plaintiffs' counsel are nationally

recognized for their excellence in civil rights, disability law, prisoner rights litigation, and complex class action litigation. In their work on this and other cases, Plaintiffs' counsel have had extensive contacts with prisoners, including meeting and corresponding with hundreds of Monterey County Jail prisoners regarding their experiences.

Rosen Bien Galvan & Grunfeld LLP

6. From its formation in 1990 as a litigation boutique, one of RBGG's specialties has been complex class action litigation in trial and appellate courts in the areas of antitrust, employment, civil rights, banking and consumer law, voting rights and disability rights. I personally have been lead or co-lead counsel in a series of successful class action lawsuits for declaratory and injunctive relief against state officials responsible for the adult and juvenile prison and parole departments. These include: *Gates v. Deukmejian*, E.D. Cal. No. 91–15270, a class action under the Eighth Amendment and the Rehabilitation Act on behalf of all prisoners at the California Medical Facility at Vacaville; *Coleman v. Brown*, E.D. Cal. No. S 90-0520 , an Eighth Amendment class action lawsuit against CDCR on behalf of a class of more than 25,000 prisoners with serious mental illness; *Hecker v. Brown*, E.D. Cal. No. 2:05-cv-2441, an ADA and Rehabilitation Act putative class action lawsuit against CDCR on behalf of all prisoners with mental illness; *Armstrong v. Brown* , N.D. Cal. No. C 94-2307, a class action against the State on behalf of California prisoners with disabilities; *Valdivia v. Davis*, 206 F. Supp. 2d 1068 (E.D. Cal. 2002), a class action under the federal Constitution on behalf of all prisoners and parolees challenging California's adult parole revocation system; and *L.H. v. Schwarzenegger*, E.D. Cal. No. S-06-2042, a class action under federal Constitution and the ADA and Rehabilitation Act on behalf of all juvenile wards and parolees in California's Department of Juvenile Justice. In addition, RBGG has also been lead or co-lead counsel in numerous other cases representing individuals or groups challenging conditions, policies and practices of prisons and jails, including cases for damages based on Constitutional violations resulting in death or injury by suicide, medical neglect and murder due to inadequate custodial practices.

7. RBGG has the capacity to thoroughly and vigorously prosecute the claims in this case and to properly represent the plaintiff class and sub-class. RBGG has committed all necessary resources to do so.

8. As the managing partner of RBGG and the managing partner on this case, I have supervised all of the legal work performed on this matter, including that of associate lawyers, law clerks, paralegals, and secretarial staff. I have also had overall responsibility, working with our lead co-counsel, James Egar, Alan Schlosser, and Eric Balaban, for major litigation decisions made by the larger Plaintiffs' counsel team. Throughout the course of this matter, I have served in the capacity of senior partner on this case. I have worked closely with my partners, Gay Grunfeld and Ernest Galvan, to coordinate the day-to-day work performed by RBGG attorneys and support staff. Collectively, we decided staffing levels as appropriate for each stage of litigation, often changing staffing levels in reaction to Defendants' litigation strategy as well as to account for the maternity and paternity leaves requested by our staff. For example, pre-filing investigations primarily required work to be completed by a small set of associate attorneys who were able to conduct initial interviews at the Jail and review pertinent documents. Later, after the Complaint was filed and the parties were engaged in heavily contested discovery, we added significant staffing to account for the intensity of the litigation. We added paralegal support to, among other things, process, organize, and review the documents produced by Defendants. At the same time, we relied on additional associate attorneys to review and code hot documents, prepare for and conduct depositions, and to draft and argue discovery motions.

9. I began working on this matter in March 2012, when I began discussing strategy and co-counseling agreements with the Monterey County Public Defender's Office and later with the ACLU-NPP and ACLU-NC. Initially, I worked closely with co-counsel to develop strategy for the investigation of the standards and conditions at the Monterey County Jail, to draft a demand letter to County Counsel, and to select and work with the neutral experts who would opine on the conditions at the Jail. I regularly

consulted with my partner, Gay Grunfeld, who took the early lead in this case supervising the day-to-day work of the legal staff, including drafting the complaint, oppositions to Defendants' motions to dismiss, class certification motion, and the motion for preliminary injunction I frequently reviewed drafts and provided strategic advice on these filings. Along with Ms. Grunfeld, I supervised the taking and defending of all depositions in this matter, and I personally participated in the deposition of the neutral medcial expert, Dr. Michael Puisis. I supervised the preparation of Plaintiffs' experts for jail tours, and attended the tour conducted by custody and disability expert, Wendy Still. Throughout the case, I took the lead role communicating strategy with my co-counsel and consulting with experts. I prepared for and attended all settlement conferences, and took the lead in negotiating the final Settlement Agreement, along with my partner, Ernest Galvan. Following settlement, I have participated in the review of Defendants' proposed implementation plans, their discussion with Defendants' counsel, and the drafting of responsive comments.

10. My partner, Gay Grunfeld, graduated from Columbia Law School in 1984 as a Harlan Fiske Stone Scholar and Articles Editor of the *Columbia Law Review*, after which she clerked for the Honorable Jack B. Weinstein of the United States District Court for the Eastern District of New York. She was admitted to the California bar in 1985. She serves as one of the lead counsel in *Armstrong v. Brown* (N.D. Cal. No. C 94-2307 CW), a class action against the California Department of Corrections and Rehabilitation ("CDCR") on behalf of more than 10,000 CDCR prisoners and parolees with mobility, hearing, vision, learning, kidney and developmental disabilities, and *Ramirez et al. v. Ghilotti Bros., Inc.* (N.D. Cal. No. 3:12-cv-04590), a class action on behalf of workers denied pay for all hours worked and meal and rest breaks. She previously served as co-lead counsel in *L.H. v. Brown* (E.D. Cal. No. CIV. S-06-2042), a due process and American with Disabilities Act ("ADA") class action on behalf of juvenile parolees, and recently served as local counsel for plaintiffs in the consumer class action *Ferrington v. McAfee, Inc.* (N.D. Cal. No. 5:10-cv-01455). She was selected to the 2013 list of the Top 100 SuperLawyers in Northern

California, and to the 2014 and 2015 list of Top 50 Women Northern California Super Lawyers. Ms. Grunfeld was honored as one of the Top 75 Women Litigators in California for 2014, 2013, and 2011 by the Daily Journal. She received the California Lawyer of the Year award for 2012. For the past two years, she has been honored by the *Daily Journal* as one of the Top 100 Lawyers in California. Her resume is attached hereto as **Exhibit B**. On this matter, Ms. Grunfeld supervised the daily work conducted by legal staff in this office that included, among other things: the initial investigation of potential claims against Defendants, the assignment of attorneys to obtain documents through public records act requests, interview clients, and review their prisoner records and other materials such as the grand jury report; the strategy related to Plaintiffs' demand letter; the research related to federal and state law claims and the drafting of Plaintiffs' Complaint; the research and drafting of briefing related to Plaintiffs' opposition to Defendants' motion to dismiss and prosecution of Plaintiffs' class certification motion; the coordination of communications with the neutral experts and the analysis of their reports; the coordination of correspondence with Defendants' counsel, including satisfying Plaintiffs' meet and confer obligations under Rule 26; the research and drafting of Plaintiffs' mediation brief; strategy for taking and defending depositions related to Plaintiffs' Motion for Class Certification; the drafting of Plaintiffs' initial discovery requests; the drafting of Plaintiffs' preliminary injunction motion; and the research and drafting of Plaintiffs' motions to strike Defendants' answers.

11. My partner, Ernest Galvan, has practiced complex civil litigation since 1998. He received his J.D. from Yale Law School in 1997, and clerked in the United States District Court for the Central District of California, for the Honorable Dean D. Pregerson. Upon completing his clerkship, he joined my law firm Rosen, Bien & Asaro as an associate. He became a partner of the firm in 2006. Mr. Galvan has led numerous litigation efforts in the *Armstrong* prison disability rights case, as well as in *Coleman v. Brown*, 438 Fed. Appx. 743 (9th Cir. 2011) (involving mental health care for a statewide class of prisoners with severe mental illness) and *Valdivia v. Schwarzenegger*, 599 F.3d

984 (9th Cir. 2010) (involving parolee rights). Mr. Galvan won a California Lawyer of the Year Award in 2012 for his successful oral advocacy before the California Supreme Court in *Retired Employees Association of Orange County v. County of Orange*. His resume is attached hereto as **Exhibit C**. On this matter, Mr. Galvan provided as-needed consultation during the early stages of this litigation, including as to strategy, research, and document drafting. Mr. Galvan's role in this case increased substantially in late 2014 when other work demands required Ms. Grunfeld to focus the majority of her resources elsewhere. Mr. Galvan worked extensively supervising and coordinating discovery, including resolving e-discovery issues with opposing counsel and outside vendors. He supervised the research and drafting of motions related to discovery disputes, and argued several of those motions. He supervised attorney interactions with experts and the drafting of expert reports. Mr. Galvan was very active in preparing for and conducting the mediation before Magistrate Judge Cousins; in so doing, he spent considerable time reviewing and drafting the settlement agreement and related documents. Throughout his involvement in the case, he regularly organized and held meetings with co-counsel to discuss case strategy, as well as issues related to discovery, mediation, settlement, and implementation plans. He supervised briefing related to the preliminary and final settlement, including notice to class and sub-class members, and attended the hearing on final approval. Mr. Galvan regularly communicated with defense counsel regarding various issues concerning the welfare of prisoners at the Jail. Along with myself, Mr. Galvan vetted neutral experts to be nominated for monitoring of the Settlement Agreement.

12. Associate attorney Michael Freedman received his J.D. in 2008 from Stanford Law School, where he was Editor-in-Chief and Managing Editor of the *Stanford Journal of Civil Liberties and Civil Rights*. Prior to joining RBGG, he served as a law clerk to the Honorable Marilyn J. Patel of the United States District Court for the Northern District of California and to the Honorable Reginald C. Lindsay of the United States District Court for the District of Massachusetts. He was named a Rising Star by Northern

California Super Lawyers in 2013, 2014, and 2015. His resume is attached hereto as **Exhibit D**.

13. Associate attorney Sarah Poppy Alexander is a 2012 graduate of Harvard Law School, where she served as Editor in Chief of the *Harvard Civil Rights-Civil Liberties Law Review* and contributed to multiple *amicus curiae* briefs filed in the United States Supreme Court related to human rights claims pursuant to the Alien Tort Statute. She obtained her M.A. in Political Science in 2007 from the University of California, Berkeley. Prior to joining RBGG, she served as a law clerk to the Honorable Martha Craig Daughtrey of the United States Court of Appeals for the Sixth Circuit in Nashville, Tennessee. Her resume is attached hereto as **Exhibit E**.

14. Associate attorney Krista-Stone Manista is a 2009 graduate of Northwestern University School of Law, where she served as Editor in Chief of the *Journal of Criminal Law and Criminology*. She obtained her M.A. in Teaching from the University of North Carolina at Chapel Hill in 2002. Prior to joining RBGG, Ms. Stone-Manista was a Legal Fellow for the American Civil Liberties Union of Illinois and served as a law clerk to the Honorable Virginia M. Kendall of the United States District Court for the Northern District of Illinois. Her resume is attached hereto as **Exhibit F**.

15. Associate attorney Van Swearingen received his J.D. in 2008 from the University of California, Berkeley School of Law (Boalt Hall), where he served as Executive Editor of the *California Law Review*. He obtained his M.P.P. in 2004 from the University of California, Berkeley, Goldman School of Public Policy. He was named a Rising Star by Northern California Super Lawyers in 2015. His resume is attached hereto as **Exhibit G**.

16. Associate attorney Sumana Wolf is a 2009 graduate of the University of California-Los Angeles School of Law, where she served as Chief Comments Editor of the *Asian Pacific American Law Journal* and a Contributing Editor of *Ms. JD at UCLA*. She left RBGG during the pendency of this litigation. Her resume is attached hereto as **Exhibit H**.

17. Associate attorney Aaron Fischer received his J.D. in 2006 from Columbia Law School. He served as a law clerk to the Honorable Jack B. Weinstein of the United States District Court for the Eastern District of New York and to the Honorable Kimba M. Wood of the United States District Court for the Southern District of New York. Prior to clerking, he completed a Skadden fellowship, through which he developed a new practice area aimed at improving health and education outcomes for children with disabilities and serious medical conditions in Washington D.C. He was named a Rising Star by Northern California Super Lawyers in 2012, 2013, 2014, and 2015. His resume is attached hereto as **Exhibit I**.

18. Associate attorney Laura Boysen-Aragon received her J.D. from Columbia Law School in 2006. She was a Harlan Fiske Stone Scholar. She is a graduate of Gonzaga University. Before joining my firm, she had three years of experience as a litigation associate at Latham & Watkins LLP. She previously served as Special Assistant Director of Policy to Governor Gray Davis. She left RBGG during the pendency of this litigation. Her resume is attached hereto as **Exhibit J**.

19. Associate attorney Sidney Hollar is a graduate of Georgetown University Law Center. She currently has her own law practice in San Francisco. She left RBGG during the pendency of this litigation. Her resume is attached hereto as **Exhibit K**.

20. Paralegals at RBGG are college graduates who have worked for at least one year as paralegal clerks under the supervision of RBGG's attorneys. Paralegal Eric Luttrell is a graduate of the University of California, Santa Cruz. He has served as a litigation paralegal for over 15 years and has worked in law firms for almost 25 years. He left RBGG during the pendency of this litigation.

21. Paralegal Rolayn Tauben is a graduate of George Washington University in Washington, D.C., where she obtained an M.A. in Art History and Theory. She received her Paralegal Studies Certificate in 1981 from San Francisco State University, and has worked at law firms for nearly 35 years, mostly as a paralegal. She left RBGG during the pendency of this litigation.

22. Paralegal Abigail Hamilton is a graduate of the University of Leicester and San Francisco State University. She has worked as a paralegal since 2011. She left RBGG during the pendency of this litigation.

23. Paralegal Haruka Roudebush is a graduate of the University of California, San Diego. He worked as a paralegal at RBGG from 2006-2015. He left RBGG during the pendency of this litigation.

24. Paralegal Doris Tseng is a graduate of the San Francisco State University. She worked as a paralegal at RBGG from 2010-2015. She left RBGG during the pendency of this litigation.

25. Paralegal Linda Woo obtained her Bachelor of Sciences from San Francisco State University, and has worked as a paralegal for 16 years.

26. Paralegal clerk Charlotte Landes is a graduate of Oberlin College.

The ACLU – National Prison Project

27. As discussed more fully in the Declaration of Eric Balaban in Support of Attorneys' Fees and Expenses, filed herewith, the ACLU-NPP has a long track record of successfully litigating prison, jail, and juvenile conditions of confinement, including cases related to the provision of medical and mental health care. The work performed by Mr. Balaban and the ACLU-NPP was integral to Plaintiffs' success in this case. Mr. Balaban was actively involved in the strategic decisions in this case, and served as the principal author of the preliminary injunction motion granted by the Court. Other ACLU-NPP legal staff assisted in preparing the preliminary injunction motion. Mr. Balaban was also primarily responsible for working with Plaintiffs' medical expert, Robert Cohen, M.D., and worked closely with Dr. Cohen in his review of documents, expert tour, expert report, recommendations for remedies, and review of Defendants' proposed implementation plans. I have reviewed the rates of ACLU-NPP's timekeepers in this matter. ACLU-NPP's rates are wholly consistent with the rates charged by comparable attorneys and legal staff in the San Francisco Bay Area and numerous other locales within California for work

comparable to that performed in the instant case. (In fact, they are lower than rates at many San Francisco Bay Area firms.)

The American Civil Liberties Union Foundation of Northern California

28. As discussed more fully in the Declaration of Alan L. Schlosser in Support of Attorneys' Fees and Expenses, filed herewith, the ACLU-NC is Northern California's regional affiliate of the ACLU, and is dedicated to defending the civil liberties and civil rights guaranteed by the federal and state constitutions. Mr. Schlosser was involved in the strategy discussions with respect to this case. He reviewed and extensively commented on the major pleadings, briefed and argued the motion to dismiss the Title III ADA claim, and participated in the first mediation session with Judge Larson. The ACLU-NC was primarily responsible for interviewing numerous witnesses and potential plaintiffs at the Jail, reviewing medical records, preparing declarations, and drafting Plaintiffs' demand letter to the Defendants as well as letters to the Board of Supervisors on issues of jail population reduction and evidence-based programs. The ACLU-NC also took the lead in researching and drafting Plaintiffs' successful Opposition to CFMG's motion to dismiss the Title III ADA claim. I have reviewed the rates of ACLU-NC's timekeepers in this matter. ACLU-NC's rates are wholly consistent with the rates charged by comparable attorneys and legal staff in the San Francisco Bay Area and numerous other locales within California for work comparable to that performed in the instant case. (In fact, they are lower than rates at many San Francisco Bay Area firms.)

The Monterey County Public Defender

29. James Egar has been the Public Defender for the County of Monterey since August 2006. In that capacity, he supervises an office of approximately 27 attorneys and oversees the conflicts program for the county. He also manages approximately 16 other employees, including investigators, paralegals, and support staff. The Public Defender's Office is engaged in both traditional criminal justice courts and treatment oriented therapeutic courts. The office handles approximately 20,000 cases annually. Mr. Egar has prepared and implemented over a dozen plenary departmental budgets, and has worked

with members of the California Legislature on criminal justice, substance abuse and mental health related issues. He possesses extensive knowledge of the day-to-day operations at the jail and supervises attorneys who have one-on-one working relationships with the prisoners who are incarcerated at the Jail. The Office of the Public Defender operates under a statutory obligation to advocate for the interests of their clients both in and outside of the criminal process. *See* Cal. Gov. Code section 27706(g).

30. Mr. Egar graduated from Loyola University of Los Angeles, School of Law, in 1975. Mr. Egar has been a California Public Defender since 1978, and a Chief Public Defender since 1996—first in Yolo County (1996-1999), then Santa Barbara County (2000-2006), and now Monterey County. Mr. Egar has tried hundreds of criminal cases to verdict over his career. He is a founding member of the American Council of Chief Defenders and participates in numerous other organizations related to criminal justice and trial advocacy. He is a former Board Member of the Orange County Bar Association and the California Public Defender's Association. He has participated in the planning and operation of Adult and Juvenile Drug Courts and the Proposition 36 Treatment Court. He teaches nationally on behalf of the United States Department of Justice, the National Drug Court Institute, and the National Association of Drug Court Professionals. He has taught on Ethics and Confidentiality for the National Drug Court Institute's Family Courts Program and Tribal Healing to Wellness Courts, and has taught evidence and trial advocacy at three law schools. In March 2014, Mr. Egar was named Defender of the Year by the California Public Defenders Association.

31. Mr. Egar and the staff of the Public Defender's Office have provided invaluable work in support of the plaintiff class in this litigation. The Public Defender's Office's day-to-day knowledge of changes and conditions and events at the Jail, and the ability to rapidly communicate with class members and their families, was critical in our successful prosecution of this case. Mr. Egar and the other attorneys, paralegals, investigators, and support staff at the Monterey County Public Defender's Office are not seeking to recover any attorneys' fees or expenses in this litigation.

GENERAL CASE BACKGROUND AND WORK THROUGH FINAL APPROVAL

32. As explained more fully below, the work performed on this case by Plaintiffs' counsel was reasonable and necessary to secure the results obtained in the Settlement Agreement. The work performed by Plaintiffs' counsel can be described in six major phases:

a. Phase 1, from March 2012 through mid-April 2013, involved the early investigation into the conditions of confinement at Monterey County Jail and the preparation of a demand letter and draft Complaint to Defendants.

b. Phase 2, from mid-April 2013 through late July 2013, involved the formal initiation of this lawsuit, as well as additional negotiations and investigation leading to the stay and the decision to retain neutral experts.

c. Phase 3, from late July 2013 through February 2014, involved settlement negotiations, working with neutral experts, and continued investigations.

d. Phase 4, from March 2014 through late October 2014, involved formal and intense litigation, including discovery, briefing and hearings related to Defendants' multiple motions to dismiss and Plaintiffs' class certification and preliminary injunction motions, and the initiation of merits discovery.

e. Phase 5, from late October 2014 through early May 2015, involved preparation for trial, merits discovery, jail inspections, and post-injunction negotiations before Judge Cousins.

f. Phase 6, from early May 2015 through the present, involved briefing related to the approval of the Settlement Agreement, meet and confer sessions related to Defendants' implementation plans, the identification and selection of neutral monitors, and consulting with experts as to the adequacy of the implementation plans. In addition to investigating and litigating Plaintiffs' claims, counsel routinely responded to emergency events by communicating with prisoners in crises (visiting them when appropriate), and communicating with Defendants' counsel regarding specific emergency needs.

Phase 1: Plaintiffs' Counsel Extensively Investigated the Conditions at the Jail Prior to Filing this Action

33. In early 2012, I was contacted by James Egar, the Public Defender for the County of Monterey, regarding serious and life-threatening problems his clients were experiencing when incarcerated in the Monterey County Jail (the "Jail"). Mr. Egar had documented problems at the Jail dating from his appointment in 2007, and had been unsuccessful in his efforts to convince the County to remedy the dangerous and unconstitutional conditions through the normal political and budgetary processes. After meeting with Mr. Egar, my partners Gay Grunfeld, Ernest Galvan and I, conducted an extensive pre-filing investigation. Working with the Monterey County Public Defender's Office, the ACLU of Northern California, and the ACLU-NPP, we have, among other investigative activities: (1) conducted more than one hundred interviews of former and current prisoners in the Jail; (2) reviewed tens of thousands of pages of medical and custody records for current and former prisoners in the Jail; (3) reviewed documents produced by the County of Monterey (the "County," or "Monterey County") in response to multiple requests for information pursuant to the California Public Records Act ("CPRA"); (4) reviewed evaluations and reports concerning the Jail obtained from CPRA requests to other public entities as well as from other public sources; (5) assisted prisoners in the process of filing grievances with Jail officials; and (6) reviewed hundreds of Monterey County Sheriff's Office ("Sheriff's Office") reports of incidents that occurred in the Jail.

34. Investigation required several attorneys from RBGG to travel to the Jail to interview dozens of prisoners about their experiences. During this phase, frequent trips were made by associates Sumana Wolf, Michael Freedman, Krista Stone-Manista, and Sidney Hollar to interview prisoners and document the facts that formed the basis for Plaintiffs' claims. Laura Boysen-Aragon played a major role in this phase to analyze the evidence being gathered.

35. On April 15, 2013, RBGG and the Public Defender's Office sent an eleven page demand letter to Monterey County Sheriff Scott Miller and the Monterey County

Supervisors. The purpose of the letter was to develop a framework for resolving Plaintiffs' claims expediently and without litigation. In that letter, we explained in detail how the County and the Sheriff's Office (collectively, "County Defendants"), through their operation of the Jail, violated the civil rights of prisoners by failing to provide reasonable accommodations to prisoners with disabilities, by failing to operate an adequate medical and mental health care system, and by failing to protect prisoners from violence and injury at the hands of other prisoners. At the conclusion of the letter, we proposed a framework for remedying the conditions in the Jail and avoiding the expense and delay of protracted litigation. We sought an agreement on a framework for negotiations by May 16, 2013. No framework agreement was reached by that date.

36. The professional hours claimed for work in Phase 1 are presented in Table 1:

Table 1, Phase 1

		Start	End
Investigation Up to Point of Sending Demand Letter		**3/29/2012**	**4/15/2013**
Class	Name	Actual Hours	After Billing Judgment
Partner	Bien, Michael W.	110.3	98.2
	Grunfeld, Gay C.	83.9	80.8
	Galvan, Ernest	4.5	0.0
Associate	Freedman, Michael L.	414.4	408.5
	Stone-Manista, Krista	164.8	158.3
	Wolf, Sumana Cooppan	66.9	65.6
	Boysen-Aragon, Laura	46.6	44.5
	Fischer, Aaron J.	0.3	0.0
Paralegal	Hamilton, Abigail M.	172.3	141.2
	Tseng, Doris	110.7	94.1
	Luttrell, Eric L.	83.9	56.9
	Roudebush, Haruka	1.6	0.0
	Tauben, Rolayn L.	0.5	0.0
Total		1,260.7	1,148.1

Phase 2: Plaintiffs' Counsel Files the Class Action Complaint

37. At the outset of this Phase, Plaintiffs' counsel continued to their investigation by interviewing prisoners and reviewing pertinent records, including individual prisoner's custody and medical records, CPRA-produced records, and publicly-available documents. Plaintiffs' counsel also researched the legal bases for Plaintiffs' claims and drafted the Complaint so that it would be ready to file in the event Defendants were unwilling to reach an agreement regarding a structured framework for resolving Plaintiffs' claims.

38. On May 23, 2013, we filed this lawsuit on behalf of five prisoners against Monterey County, the Sheriff's Office, and California Forensic Medical Group, Inc. ("CFMG" and, collectively, "Defendants"). *See* Complaint, Dkt. No. 1. The complaint alleged four primary claims under federal and California law: (1) that Defendants violate the United States and California constitutions through their failure to keep prisoners safe from violence from other prisoners in the Jail; (2) that Defendants violate the United States and California constitutions through their failure to provide adequate medical care to prisoners in the Jail; (3) that Defendants violate the United States and California constitutions through their failure to provide adequate mental health care to prisoners in the Jail; and (4) that Defendants violate federal and California disability rights laws by failing to provide reasonable accommodations and discriminating against prisoners with disabilities in the Jail.

39. The professional hours claimed for work in Phase 2 are presented in Table 2:

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

Table 2, Phase 2

		Start	End
Post-Demand Negotiations And Continued Investigation		**4/16/2013**	**7/26/2013**
Class	Name	Actual Hours	After Billing Judgment
Partner	Grunfeld, Gay C.	109.3	103.45
	Bien, Michael W.	39.2	38.68
	Galvan, Ernest	1.6	0
Associate	Wolf, Sumana Cooppan	181.3	180.16
	Freedman, Michael L.	137.2	135.1
	Stone-Manista, Krista	80.2	78.45
	Hollar, Sidney S.	41.8	38.1
Paralegal	Luttrell, Eric L.	223.1	168.8
	Hamilton, Abigail M.	67.1	54.9
	Roudebush, Haruka	0.9	0
	Tauben, Rolayn L.	0.1	0
Total		881.8	797.64

Phase 3: The Parties Agreed on Four Neutral Experts to Evaluate Plaintiffs' Principal Allegations of Unconstitutional and Illegal Conditions at the Jail

40. We entered into negotiations with Defendants almost immediately after filing the lawsuit and offered to stay the litigation pending negotiations. On July 29, 2013, before any of the Defendants had filed an answer or other responsive pleading, the Court entered a stipulated order staying the action until January 1, 2014. *See* Dkt. No. 11. The purpose of the stay was to permit the parties time to "(1) engage in a process of mutually agreeing to experts who will review and analyze the conditions at the Monterey County Jail and issue reports, and (2) to engage in settlement negotiations aimed at achieving mutually agreeable relief." *See* Dkt. No. 9, at 1.

41. At the outset of the stay, the parties agreed on four neutral experts—one for each of the primary claims in the Complaint—to assess the allegations of Plaintiffs'

Complaint. These experts were: Michael Hackett, a correctional security expert; Dr. Michael Puisis, D.O., an expert in correctional medical services; Dr. Richard Hayward, Ph.D., an expert in correctional mental health care services; and SZS Consulting, an organization with expertise in disability rights laws and facility evaluation.

42. During the late-summer and early-fall of 2013, the four neutral experts conducted their reviews. Each of the experts conducted at least one site visit to the Jail. The experts also evaluated a number of documents, including Defendants' policies and procedures. The experts completed their reports and produced them to the parties in late 2013 and early 2014. *See* Dkt. No. 49-1 through 49-7, Exs. D-P. The neutral experts' reports revealed serious and systemic constitutional, American with Disabilities Act, and Rehabilitation Act violations at the Jail. *See generally id.*

43. After receiving the neutral experts' reports, the parties engaged in several rounds of negotiations regarding changes at the Jail, including by exchanging initial ideas regarding remedial plans for the Jail. These conferences, conducted by letter and teleconference, failed to produce an agreement. The parties concluded that further negotiations would not be productive.

44. The professional hours claimed for work in Phase 3 are presented in Table 3:

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

/ / /

Table 3, Phase 3

		Start	End
Settlement Negotiations, Working with Neutral Experts, Drafting First Round of Remedial Plans, Continued Investigation		**7/27/2013**	**2/28/2014**
Class	Name	Actual Hours	After Billing Judgment
Partner	Grunfeld, Gay C.	212.1	206.7
	Bien, Michael W.	84.2	84.2
	Galvan, Ernest	1.0	0.0
Associate	Freedman, Michael L.	395.1	373.1
	Alexander, Sarah Poppy	118.0	115.4
	Stone-Manista, Krista	86.4	85.6
	Hollar, Sidney S.	56.4	56.4
Paralegal	Luttrell, Eric L.	210.3	148.7
	Tauben, Rolayn L.	127.8	80.6
	Hamilton, Abigail M.	19.8	15.6
	Roudebush, Haruka	2.1	0.0
Total		1,313.2	1,166.3

Phase 4: The Stay Is Lifted and Litigation Accelerates

45. Upon the breakdown of negotiations the stay was lifted and Plaintiffs promptly filed an Amended Complaint. *See* Dkt. No. 41. Defendants presented an aggressive defense. Plaintiffs' efforts to reduce the time and expense of litigating were often contested or simply ignored. Litigation over each substantive motion – including motions to dismiss, class certification, motions to strike, and preliminary injunction motion – was hotly contested. Defendants repeatedly put up barriers to Plaintiffs' routine requests to obtain their own medical records, often reinterpreting the intent and substance of the parties' multiple protective orders in this case.

46. On April 25, 2014, County Defendants filed an initial motion to dismiss, challenging the standing of one plaintiff not in custody when his claim was filed and the mootness of the claims of nine prisoners who were no longer in custody. *See* Dkt. No. 44. Defendant CFMG filed its own motion to dismiss, joining the County Defendants' motion based on standing and also challenging Plaintiffs' sixth cause of action against CFMG under Title III of the ADA. *See* Dkt. No. 59. County Defendants later amended their motion to dismiss by dropping one Plaintiff based on his re-incarceration and adding two others because they had been released from custody. *See* Dkt. No. 75. In opposing Defendants' motions to dismiss, Plaintiffs worked under severe time pressure to visit with prisoners at the Jail to prove their incarceration and submitted declarations on behalf of numerous declarants, including prisoners Martha Gomez, Wesley Miller, and Glenda Hunter. *See* Dkt. Nos. 79, 80, and 93-2. The Court denied Defendants' motions to dismiss. *See* Dkt. No. 128. In doing so, the Court rejected County Defendants' standing and mootness arguments. *See id.* at 12-16. The Court noted the novelty of the question of whether Title III of the Americans with Disabilities Act ("ADA") covers a private provider of jail medical services, and found that Plaintiffs had sufficiently alleged that CFMG operates of a place of public accommodation for purposes of Title III. *See id.* at 1 and 16-20.

47. Plaintiffs moved for class certification on April 29, 2014. *See* Dkt. Nos. 48 and 56. Plaintiffs engaged expert witnesses to study jail conditions at the class certification stage: Dr. Pablo Stewart, a board-certified psychiatrist and Clinical Professor in the Department of Psychiatry at the University of California, San Francisco with extensive experience in correctional mental health, and Dr. Robert L. Cohen, board-certified medical doctor of internal medicine and an expert in the field of correctional medicine. Dr. Stewart submitted a 40-page declaration in support of class certification identifying and explaining: (1) the insufficient staffing of mental health care clinicians, medical clinicians, and custody staff; (2) Defendants' failure to adequately identify prisoners with mental illness during the intake and booking process; (3) Defendants'

failure to continue providing the care prisoners were receiving in the community and/or failure to provide the care prisoners require when they arrive at the Jail; (4) how Defendants lack an adequate method for prisoners to request mental health care services; (5) how Defendants' inadequate medication administration and prescription drug renewal processes at the Jail place all prisoners at risk of serious harm; (6) how the group and individual therapy offered to prisoners with serious mental illness is not sufficient to adequately treat the mentally ill population in the jail; (7) how Defendants lack adequate policies and practices for transferring prisoners who require higher levels of psychiatric care to facilities licensed to provide that level of care; (8) how housing prisoners with serious mental illness in administrative segregation places prisoners' mental health In serious jeopardy; (9) the deficiencies in Defendants' suicide prevention program; (10) Defendants' failure to maintain an adequate quality improvement plan for identifying and fixing problems with the delivery of mental health care and especially for responding to completed and attempted suicides; and (11) how the overcrowded nature of the Jail magnifies the above problems. *See* Dkt. No. 51.

48. Defendants sought and obtained multiple delays of the class certification briefing schedule for their Opposition, and initiated discovery concerning class certification. Plaintiffs objected to Defendants' repeated delays and attempted, with little success, to streamline and minimize class certification discovery. During the summer of 2014, Defendants deposed Dr. Stewart and Dr. Cohen, all twenty-one named Plaintiffs (Jesse Hernandez, Cain Aguilar, Ha Cobb, Susan Dilley, Connie Dobbs, Sean Esquivel, Ramona Gist, Martha Gomez, George Greim, Dennis Guyot, Jason Hobbs, Glenda Hunter, Albert Key, Brandon Mefford, Wesley Miller, Richard Murphy, Jeff Nichols, Angel Perez, Sarab Sarabi, Clyde Whitfield, and Robert Yancey); and five Jail prisoners who submitted declarations on behalf of Plaintiffs' motions for class certification and preliminary injunction (James Lewis, Robyn Woods, John Diaz, Bradley Buell, and Juan Sanchez). Plaintiffs' counsel informed defense counsel that deposing every named Plaintiff was unnecessary for class certification and would be difficult due to the transitory nature of

many of the indigent individual Plaintiffs. Defendants refused to yield, and at their request, Plaintiffs' counsel made each requested witness available for deposition. These depositions required considerable effort to identify the whereabouts of several Plaintiffs. The depositions also required a great number of trips to various locations throughout Monterey County to prepare for and conduct the depositions.

49. The parties retained a private mediator in the summer of 2014 in an attempt to negotiate a settlement, but failed.

50. In June 2014, Defendants deposed neutral expert, Dr. Michael Puisis, contesting the bases for his opinions regarding the state of medical care at the jail. Defendants also deposed Pablo Stewart and Dr. Robert Cohen in connection with class certification. Defendants' Oppositions to class certification focused on the ultimate merits of Plaintiffs' claims and on the individual Plaintiffs' past treatment in the Jail, and argued again that Plaintiffs lacked standing, their claims were moot, and that they failed to meet the Rule 23(a) prerequisites to class actions, that the proposed relief could not satisfy Rule 23(b)(2), and that Plaintiffs' expert declarations were inadmissible. *See* Dkt. Nos. 133 and 169. Defendant CFMG filed evidentiary objections to Plaintiffs' declarations in support of class certification. *See* Dkt. No. 169. CFMG also engaged its own expert witnesses who provided detailed declarations in opposition to class certification: Dr. Jason Roof, a physician board certified in neurology and psychiatry and an Associate Clinical Professor of Psychiatry at the University of California, Davis Medical Center, and Kathryn Wild, R.N., a registered nurse who has worked in the correctional healthcare field for 29 years. *See* Dkt. Nos. 129-3 and 180-1.

51. Plaintiffs deposed Defendants' class certification experts, Dr. Jason Roof and Kathryn Wild, R.N., in September and October of 2014. Plaintiffs also deposed three Fed. R. Civ. P. 30(b)(6) witnesses who testified as to Defendants' practices, policies, and procedures relevant to Plaintiffs' claims (Elaine Hustedt, Nancy Hatton, and James Bass).

52. Plaintiffs' Reply in support of class certification focused on how Plaintiffs satisfied the Rule 23 requirements and explained the applicability of *Parsons v. Ryan*, 754

F.3d 657 (9th Cir. 2014), which held in a similar case that prisoners challenging the constitutionality of health care in the Arizona correctional system satisfied the requirements of Rule 23. *See* Dkt. No. 355. Plaintiffs' Reply was supported by declarations from Plaintiffs' experts, Dr. Stewart and Dr. Cohen, both of which were also filed in support of Plaintiffs' motion for preliminary injunction (Dkt. No. 108). Dr. Stewart's 29-page declaration rebutted Dr. Roof's analysis and reiterated concerns about Defendants' policies and practices with respect to mentally ill prisoners. *See* Dkt. No. 356. Dr. Cohen's 47-page declaration rebutted Ms. Wild's opinions and explained, with respect to medical practices and policies at the Jail: (1) how Defendants' tuberculosis program places prisoners at risk; (2) how Defendants lack a reliable system to ensure medication continuity; (3) how Defendants do not adequately identify and treat prisoners for withdrawal; (4) how Defendants' health care request process is flawed; (5) how Defendants' emergency response is flawed; and (6) how Defendants' medical staffing levels are insufficient. *See* Dkt. No. 360.

53. Prior to resolution of the class certification motion, on August 26, 2014, Plaintiffs moved for a preliminary injunction to address six areas: (1) tuberculosis screening; (2) medication continuity; (3) drugs and alcohol detoxification; (4) suicide prevention in segregation units; (5) disability access for persons with mobility impairments; and (6) sign language interpreters. *See* Dkt. No. 108-2. The motion was supported by extensive briefing and the submission of substantial evidence including declarations by experts for the Plaintiffs, including the Reply declarations of Dr. Cohen and Dr. Stewart, as described above. In fact, all of the evidence in support of the Preliminary Injunction was also submitted in support of class certification and the two motions were argued before the Court in a single hearing on October 29, 2014. Several Plaintiff class members either committed suicide or attempted suicide during this phase of the litigation.

54. The professional hours claimed for work in Phase 4 are presented in Table 4:

Table 4, Phase 4

		Start	End
Motions to Dismiss, Class Certification Briefing and Hearing, Class Certification Discovery, Formal Mediation, Preliminary Injunction Briefing and Hearing		**3/1/2014**	**10/29/2014**
Class	Name	Actual Hours	After Billing Judgment
Partner	Bien, Michael W.	457.5	455.2
	Grunfeld, Gay C.	412.2	410.3
	Galvan, Ernest	7.8	0.0
Associate	Freedman, Michael L.	1,270.0	1,257.5
	Alexander, Sarah Poppy	895.3	884.9
	Swearingen, Van	407.9	404.4
	Stone-Manista, Krista	190.6	190.4
	Fischer, Aaron J.	181.0	167.3
Paralegal	Luttrell, Eric L.	567.9	345.0
	Tauben, Rolayn L.	475.3	278.1
	Roudebush, Haruka	94.1	74.3
	Hamilton, Abigail M.	2.3	0.0
Total		4,961.9	4,467.2

Phase 5: Merits Discovery, Continued Litigation, and Additional Jail Inspections

55. During this fifth phase, my partner Gay Grunfeld transitioned her responsibilities of the day-to-day oversight of the work on this case to our partner Ernest Galvan.

56. Merits discovery involved a major effort by Plaintiffs' counsel to collect, analyze, and prepare facts to support trial, which was set for early September 2015. Following discovery on class certification issues, merits discovery began in earnest in the fall of 2014. During late 2014 and early 2015, Plaintiffs deposed three staff employed by CFMG (Lola Bayer, Charlotte Gage, and Kevin Coolidge), as well as the Jail operations

commander employed by the Sheriff's Office (John Mihu). Additional depositions were scheduled at the time the parties settled.

57. All parties served numerous sets of written discovery. On Defendant CFMG, Plaintiffs served eight sets of Request for Production of Documents ("RPDs"), comprising 271 individual requests; and six sets of interrogatories on Defendant CFMG (one on behalf of each Plaintiff Jesse Hernandez, Cain Aguilar, Ha Cobb, Susan Dilley, Connie Dobbs, and Sean Esquivel). Plaintiffs served two sets of interrogatories on County Defendants (one on behalf of Plaintiff Cain Aguilar, another on behalf of Plaintiff Ha Cobb); four requests for inspection (one for each set of operations: custody and disability, mental health care, medical care, and dental care); and six sets of RPDs, comprising 452 individual requests. County Defendants and CFMG each produced tens of thousands of electronic documents in response. Plaintiffs also issued third-party subpoenas in furtherance of their discovery, including to CFMG's outside nurse evaluator Barbara Cotton, Natividad Medical Center, Monterey County's jail needs assessment consultant TRG Consulting, the parties' neutral disability access consultant SZS Consulting Group, the Institute for Medical Quality, neutral experts Michael Hackett, and Dr. Richard Hayward, resulting in the production of thousands of additional documents. CFMG served interrogatories on each named Plaintiff, additional interrogatories on certain named Plaintiffs, one set of RPDs, and subpoenaed medical records from named Plaintiffs. County Defendants served three RPDs on each named Plaintiff, comprising 44 individual requests, and served Interrogatories on numerous named Plaintiffs. CFMG also served interrogatories, requests for production, and deposition subpoenas on the Public Defender's Office. Plaintiffs had to review, code, and manage tens of thousands of pages of hard-copy discovery and significant electronic discovery. Because of Defendants' refusal to produce documents and responses within the discovery response timeframes ordered by the Court, Plaintiffs were also frequently forced to review and manage documents on extremely shortened time-frames in order to adequately use the information during depositions and for court filings.

58. Discovery was highly contested; the parties brought seven discovery disputes to the Court for decision, including disputes over depositions, privilege and redaction issues, protective order disputes, motions to compel delayed document production, and protocol for jail inspections. *See* Dkt. Nos. 123, 375, 385, 398, 430, 453, and 466. Discovery was nearly complete when the parties settled; indeed, the fact discovery cut-off was scheduled just one week after settlement. *See* Dkt. No. 103.

59. Plaintiffs attempted to avoid protracted litigation. For example, Plaintiffs sent letters asking Defendants to amend inapplicable and/or insufficient affirmative defenses and withdraw their jury demand on the grounds that juries are not available in injunctive cases. County Defendants refused to so amend; CFMG simply ignored the letter. Plaintiffs moved to strike Defendants' Answers to Plaintiffs' Second Amended Complaint on November 4, 2014. *See* Dkt. Nos. 376, 377. Following a stipulated agreement that Defendants would modify or delete their affirmative defenses and the subsequent amendments to their answers, Defendants filed amended Answers plagued by the same deficiencies identified in Plaintiffs' initial letters. Plaintiffs were thus forced to file renewed Motions to Strike Defendants' affirmative defenses on the grounds that a jury trial was not available for claims for declaratory and injunctive relief, and that Defendants' affirmative defenses were insufficiently pled and/or not affirmative defenses. *See* Dkt. Nos. 391, 392. Oral argument was held on January 13, 2015. *See* Dkt. No. 412. On April 14, 2015, the Court granted Plaintiffs' Motions to Strike, striking County Defendants' request for a jury trial as well as every single affirmative defense asserted by Defendants. *See Hernandez v. County of Monterey*, 306 F.R.D. 279, 293 (N.D. Cal. 2015) (Dkt. No. 462). Had Defendants amended their answers as initially suggested by Plaintiffs' counsel, the parties would have avoided multiple rounds of briefing.

60. The Court certified the class and disability sub-class on January 29, 2015. *See Hernandez v. County of Monterey*, 305 F.R.D. 132 (N.D. Cal. 2015) (Dkt. No. 431). The class is defined as "all adult men and women who are now, or will be in the future, incarcerated in the Monterey County Jail." *Id.* at 164. The Court also certified a sub-class

of "all qualified individuals with a disability, as that term is defined in 42 U.S.C. § 12102, 29 U.S.C. § 705(9)(B), and California Government Code § 12926(j) and (m), and who are now, or will be in the future, incarcerated in the Monterey County Jail." *Id.* In certifying the class, the Court found that "Plaintiffs have produced adequate evidence of specific system-wide policies and practices exposing inmates to a substantial risk of serious harm, violating their constitutional or statutory rights; and they have clearly defined the class claims." *See* Dkt. No. 431 at 33. The Court further noted that "all members of the putative class and subclass have in common their alleged exposure to a substantial risk of serious future harm to which Defendants are allegedly deliberately indifferent, as a result of policies and practices that govern the overall conditions of health care services and confinement. While results of exposure may vary, ranging from no harm to death, each inmate suffers the same constitutional or statutory injury when exposed to a policy or practice that creates a substantial risk of serious harm." *Id.* at 35.

61. In the weeks before the settlement, Plaintiffs completed four inspections of the Jail. On March 23, 2015, Dr. Donald Sauter, accompanied by Plaintiffs' counsel, toured the Jail in an inspection of all relevant activities, services, and operations related to dental care. On March 30-31, 2015, Dr. Pablo Stewart, accompanied by Plaintiffs' counsel, toured the Jail in an inspection of all relevant activities, services, and operations related to mental health care. On April 1-2, 2015, Dr. Robert Cohen, accompanied by Plaintiffs' counsel, toured the Jail in an inspection of all relevant activities, services, and operations related to medical health care. On April 6, 2015, correctional operations expert Wendy Still, accompanied by Plaintiffs' counsel, toured the jail in an inspection of all relevant activities, services, and operations related to custodial and operations and ADA compliance. Plaintiffs had worked extensively with their expert consultants, and were preparing to disclose their testifying experts and their opinions when the case settled.

62. The Court granted Plaintiffs' Motion for Preliminary Injunction on April 14, 2015. *See Hernandez v. County of Monterey*, __ F.3d __, 2015 WL 3868036 (N.D. Cal., Apr. 14, 2015) (Dkt. No. 460). The Court concluded that, absent an injunction, Plaintiffs

would continue to suffer serious risks from Defendants' practices: "They will remain at heightened risk of contracting TB, or of their TB not being timely detected and treated. Those housed in segregation will remain at unnecessary risk of committing suicide or harming themselves. Those booked into the jail on medications are at unreasonable risk of having those medications stopped and not restarted for weeks and months. Mobility impaired inmates will continue to be denied fresh air and exercise, as well as access to vital programs that could shorten their jail stays, for no reason other than they have a disability. And inmates who use sign language as their primary method of communication will continue to be discriminated against every time they need to communicate with staff at the jail." *See id.* at 39. The Court required Defendants to file a plan by June 13, 2015 that includes, at a minimum, reforms to the following issues: infection control and tuberculosis, detoxification, medication continuity, suicide prevention, disability access, intake screening, safety cells, custody staffing, clinical staffing, medical care, mental health care, dental care, and physical safety. *See id.* at 42-44.

63. The professional hours claimed for work in Phase 5 are presented in Table 5:

///

///

///

///

///

///

///

///

///

///

///

///

Table 5, Phase 5

		Start	End
Trial Preparation, Merits Discovery, Jail Inspections, Post-Injunction Negotiations		**10/30/2014**	**5/6/2015**
Class	Name	Actual Hours	After Billing Judgment
Partner	Galvan, Ernest	452.6	449.6
	Bien, Michael W.	357.2	355.1
	Grunfeld, Gay C.	49.7	49.1
Associate	Alexander, Sarah Poppy	691.4	669.9
	Freedman, Michael L.	525.2	508.8
	Stone-Manista, Krista	425.9	421.6
	Swearingen, Van	327.3	319.5
	Fischer, Aaron J.	9.3	0.0
Paralegal	Tauben, Rolayn L.	368.9	165.1
	Luttrell, Eric L.	112.2	72.1
	Woo, Linda H.	59.8	59.1
	Roudebush, Haruka	25.5	19.8
Paralegal Clerk	Landes, Charlotte J.	311.0	270.2
	Morrison, Kevin J.	49.1	49.1
Total		3,765.1	3,409.0

Phase 6: Settlement Negotiations and Agreement, Court Approval, and Implementation Plans

64. After the Court issued the Preliminary Injunction, and as the Plaintiffs' experts were completing their jail inspections, the parties resumed settlement discussions. The parties participated in eight days of settlement conferences before the Honorable Nathanael M. Cousins, United States Magistrate Judge, from March 30 through May 4, 2015 (on March 30, April 17, April 23, April 27, May 1, May 2, May 3, and May 4, 2015) at which the parties explored and debated many of the determinative issues in the case.

The Parties exchanged multiple revisions to the settlement agreements, leading up to the final Settlement Agreement executed on May 11, 2015. The Court ordered final approval of the Settlement Agreement on August 18, 2015, incorporating the Settlement Agreement into its Order and finding that it has the full force and effect of an order of the Court. *See* Dkt. No. 494 ¶ 4 & Ex. A.

65. The Settlement Agreement secures significant advantages for the Plaintiff class. The agreement embodied in the settlement, taken as a whole, addresses each of the constitutional and statutory violations alleged by Plaintiffs. Among its provisions, the settlement requires sweeping improvements to the Jail's tuberculosis screening program, a process for ensuring prisoners are continued on medications prescribed for them prior to their arrest, and a program to ensure timely access to mental health services. Prisoners with disabilities will no longer be categorically excluded from a host of programs and services at the Jail. Prisoners in crisis will not be placed in punitive or unsanitary conditions, and the County will have to remove hanging points from the Jail's segregation units—suicide hazards that have been used by numerous prisoners to commit suicide in recent years. For the purposes of jurisdiction and enforcement, the Settlement Agreement complies with the requirements of the Prison Litigation Reform Act ("PLRA"), 18 U.S.C. § 3626(a)(1)(A), in that it is narrowly drawn, extends no further than necessary to correct the violation of the Federal right, and is the least intrusive means necessary to correct the violation of the Federal right of the Plaintiffs. *See* Dkt. No. 494, Ex. A ¶ 45.

66. This settlement resolves all the claims in this case. The Settlement Agreement requires Defendants to immediately develop Implementation Plans for the improvement of care, services, programs, and activities that relate to security, medical care, mental health care, dental care, and disability accommodations to prisoners in the Monterey County Jail. The Implementation Plans are intended to ensure that the class is not exposed to substantial risks of serious harm, and that the sub-class is not subject to discrimination on account of disability. These Implementation Plans will address: Intake Screening, Infection Control, Detoxification, Safety Cells, Medication Continuity, Custody

Staffing, Clinical Staffing, Medical Care, Mental Health Care, Dental Care, Safety, and Prisoners with Disabilities. *See id.* ¶ 31 (describing with specificity content of the Implementation Plans). The Settlement Agreement describes substantial revisions to Defendants' policies, procedures, and practices. *See id.* ¶¶ 10, 20, 31. In the event there are any disputes between the parties regarding the scope or details of the Implementation Plans, those disputes will be submitted to Judge Cousins for resolution. *See id.* ¶ 33. Thereafter, if the parties are still unable to agree to the content of the Implementation Plans, the parties shall seek redress with the Court. *See id.*

67. The Settlement Agreement provides sufficient monitoring powers to neutral experts and Plaintiffs' counsel to ensure that the settlement will be enforced. The settlement provides that five neutral experts will monitor Defendants' compliance with the agreed-upon Implementation Plans with respect to ADA compliance, mental health care, medical care, general conditions of confinement and jail security, and dental care. *See id.* ¶ 35. The Settlement Agreement includes provisions such that the monitors will have access to all Jail facilities on reasonable notice as well as to personnel whose duties pertain to the provision of services and/or who work with inmates in the area of the expert's expertise. *See id.* ¶¶ 39-40. The designated monitors have full access to County and CFMG documents to monitor Defendants' compliance with the terms of this Settlement Agreement and all Implementation Plans. *See id.* ¶ 40(b). At least twice a year, designated monitors for each topic will prepare a written report on the Defendants' efforts to meet the terms of this Settlement Agreement and all Implementation Plans. *See id.* ¶ 40(e).

68. This settlement provides Plaintiffs with oversight of Defendants' compliance. Under the Settlement Agreement, Plaintiffs are entitled to conduct reasonable and limited monitoring of Defendants' compliance with Settlement Agreement and/or the Implementation Plans, including up to four one-day inspections of Jail operations per year. *See id.* ¶¶ 41-43. Plaintiffs will also receive from Defendants a monthly report and document production to be used for tracking and monitoring performance under the

Implementation plans. *See id.* ¶ 41. The parties agreed to meet and confer regarding any disputes regarding the scope and extent of inspections or access to information, and if necessary, the parties will seek the involvement of Judge Cousins to resolve disputes. *See id.*

69. This is a powerful and complete remedial process. Because the settlement complies with PLRA requirements, the Court has full power to enforce the provisions of the Settlement Agreement and the Implementation Plans therein. The Settlement Agreement provides a dispute resolution process to resolve enforcement issues and to bring such issues to the Court for decision. *See id.* The Settlement Agreement provides for the Court to retain jurisdiction to enforce its terms, as well as the terms of the Implementation Plans for a period of five years, unless Plaintiffs' counsel can demonstrate to the Court through noticed motion that jurisdiction should be retained for a longer period. *Id.* ¶ 47.

70. Plaintiffs' counsel has maintained years-long relationships with the named Plaintiffs, timely informing them of the progress of the case and responding to their questions and needs. Following settlement negotiations, Plaintiffs' counsel sent letters to each named Plaintiff, and made attempts to discuss the settlement with each named Plaintiff in person or over the phone. None of the named Plaintiffs had any objections to the substance of the Settlement Agreement. Plaintiffs' counsel additionally drafted a Notice of Class Action Settlement for posting within the Jail for the benefit of other class and sub-class members.

71. In light of these benefits to the Plaintiff class and sub-class, Plaintiffs submitted with Defendants a Joint Motion for Final Approval of Class Settlement on July 28, 2015. *See* Dkt. No. 489. On August 18, 2015, the Court ordered final approval of the Settlement Agreement, incorporating the Settlement Agreement into its Order and finding that it has the full force and effect of an order of the Court. *See* Dkt. No. 494 at ¶ 4 & Ex. A. Thereafter, Plaintiffs' counsel began to work on the instant fees motion.

72. Pursuant to the settlement, Defendants presented Plaintiffs' counsel with implementation plans regarding specific Jail policies and practices beginning in late July

and August, 2015. Plaintiffs' counsel have reviewed these implementation plans with experts Wendy Still, Dr. Pablo Stewart, Dr. Donald Sauter and Dr. Robert Cohen. Plaintiffs' counsel continue to meet and confer with Defendants' counsel regarding the sufficiency of the implementation plans.

73. The professional hours claimed for work thus far in Phase 6 are presented in Table 6:

Table 6, Phase 6

		Start	End
Finalizing Settlement, Fairness Hearing, Implementation Plans (ongoing)		**5/7/2015**	**9/10/2015**
Class	Name	Actual Hours	After Billing Judgment
Partner	Bien, Michael W.	136.1	135.5
	Galvan, Ernest	128.1	127.5
	Grunfeld, Gay C.	4	0.0
Associate	Swearingen, Van	191	186.6
	Alexander, Sarah Poppy	71.9	71.8
	Stone-Manista, Krista	68	67.6
	Freedman, Michael L.	0.8	0.0
Paralegal	Tauben, Rolayn L.	79.3	47.1
Paralegal Clerk	Landes, Charlotte J.	63.1	47.1
Total		742.3	683.2

	Total of All 6 Phases	12,925.00	11,671.4

NEGOTIATIONS, AGREEMENTS, AND COURT ORDER CONCERNING PLAINTIFFS' REQUEST FOR ATTORNEYS' FEES AND EXPENSES

74. Under the Settlement Agreement, Plaintiffs' counsel agreed to cap its fees and expenses incurred through Final Approval of the Settlement Agreement, including approval of all implementation plans, at $4.8 million. *See id.* ¶ 62. This cap represents a

substantial cut from the reasonable fees that would have been available to Plaintiffs' counsel as a matter of law. Plaintiffs' counsel agreed to this major cut in fees for the purposes of facilitating settlement and maximizing the scope and speed of the remedial process. Plaintiffs' attorneys continue to meet and confer with Defendants about the content of the agreed-upon remedies, independently consult with experts as to the adequacy of the implementation plans, communicate with Plaintiff class and sub-class members regarding their current experiences at the Jail, and perform work on all calendared matters, including this Motion.

75. Plaintiffs' counsel also agreed to cap their fees and expenses to enforce the settlement provisions. The parties' agreement provides that Plaintiffs may petition the Court for an award of no more than $250,000 per year in fees and expenses arising from monitoring work, inspections, negotiations, meet and confer processes, mediation, review of documents, and correspondence with class members, until termination of Court enforcement. *See* Ex. A ¶ 63. Based on my experience regarding the professional time and expenses necessary to monitor a remedy of this type, this $250,000 represents a very substantial cut from the hours and expenses that will be necessary. The settlement also provides that Plaintiffs will not seek fees and expenses in an amount above $150,000 each year on motions to enforce the Settlement Agreement. *Id.* There is no cap on fees and expenses plaintiffs incur to oppose any motions brought by defendants, such as a motion to limit or terminate all or part of the Settlement Agreement. *Id.*

76. These negotiations and the $4.8 million cap agreed to by the parties in the Settlement Agreement satisfies the meet and confer requirement of Local Rule 54-5(b)(1).

PLAINTIFFS' COUNSEL'S REASONABLE ATTORNEYS' FEES

77. RBGG's rates are wholly consistent with the rates charged by comparable attorneys and legal staff in the San Francisco Bay Area and numerous other locales within California for work comparable to that performed in the instant case. (In fact, they are lower than rates at many San Francisco Bay Area firms.) My firm's billing practices are similarly comparable to those of other attorneys and legal staff in the San Francisco Bay

Area and elsewhere in California. My firm's billing rates are charged to and paid by our many clients who pay by the hour on a monthly billing basis, in matters arising both inside and outside the State of California. They are also the rates we claim in our fee applications in all our fee-shifting cases, both inside and outside the San Francisco Bay Area. These contain no contingency, delay or preclusion components. They have been accepted consistently by courts in California and elsewhere. The 2015 hourly rate for each timekeeper included in RBGG's lodestar calculation is set forth in the Table 7:

Table 7, RBGG Rates

Classification	Name	Law Grad Date	Rate
Partner	Bien, Michael W.	1980	$840
	Grunfeld, Gay C.	1984	$710
	Galvan, Ernest	1997	$690
Associate	Boysen-Aragon, Laura	2006	$490
	Fischer, Aaron J.	2006	$490
	Hollar, Sidney S.	1984	$490
	Freedman, Michael L.	2008	$470
	Swearingen, Van	2008	$470
	Stone-Manista, Krista	2009	$440
	Wolf, Sumana Cooppan	2009	$440
	Alexander, Sarah Poppy	2012	$380
Paralegal	Hamilton, Abigail M.		$250
	Luttrell, Eric L.		$295
	Roudebush, Haruka		$250
	Tauben, Rolayn L.		$295
	Tseng, Doris		$250
	Woo, Linda H.		$290
Paralegal Clerk	Landes, Charlotte J.		$220
	Morrison, Kevin J.		$200

78. I require all RBGG staff, including myself, to keep contemporaneous and highly reliable time records of the amount of time spent on each activity related to this case. My partner, Ernest Galvan, has reviewed each time entry for every timekeeper in this matter, and has made reasonable billing judgments to eliminative excessive, duplicative, and unnecessary billing entries. In addition, Mr. Galvan reduced to zero all hours spent by any RBGG attorney on this matter who billed fewer than 40 hours over the course of the case. Mr. Galvan also zeroed out all hours spent by any RBGG paralegal or law clerk who billed fewer than 49 hours over the course of the case. As a result of this discretional reduction, there are 12 fewer attorneys and 14 fewer paralegals and law clerks for whom RBGG is claiming attorneys' fees, amounting to a reduction of approximately 330 hours, or $108,440 in attorneys' fees. I regularly rely on Mr. Galvan to perform billing judgment reductions to RBGG time entries that my firm submits in support of fees motions. I have discussed with Mr. Galvan the billing judgment reductions he made to the time entries in this case, and agree with his methodology and judgments. In calculating the lodestar described below for RBGG timekeepers, Mr. Galvan has made appropriate billing judgment reductions.

79. Attached as **Exhibit L** are two tables summarizing RBGG's professional time in this matter. The first table shows all timekeepers for whom compensation is claimed, after removing attorneys with fewer than 40 hours and paralegals with fewer than 49 hours. The second table is an overall summary of the billing judgment deductions. RBGG expended 13,255 professional hours (Exh. L at page 2) during the period from March 2012 through mid-September 2015. RBGG has written off a total of 1,584 hours, or approximately 12% of the billable hours. (Exh. L at page 2.) This amounts to $519,451 in billing judgment reductions to assure that we have accounted for any undue duplication of effort or inefficiency. (Exh. L. at page 2.) After these billing judgment reductions, RBGG claims a total of 11,671 hours of compensable time for a total claimed lodestar of $5,630,634 for all work invested in this case through September 10, 2015. (Exh. L at page

1.) All the work claimed by RBGG was necessary, and was performed by skilled and able counsel, who appropriately organized the work so that most was performed by associates and paralegals. RBGG timekeepers have demonstrated their high levels of skill and have worked to avoid undue duplication of effort or inefficiency.

80. Mr. Galvan has also reviewed ACLU-NPP and ACLU-NC's time entries. Mr. Galvan worked closely with Mr. Balaban in making appropriate billing judgment reductions to ACLU-NPP's time entries. Similarly, Mr. Galvan worked closely with Mr. Schlosser in making appropriate billing judgment reductions to ACLU-NC's time entries. I have discussed with Mr. Galvan the billing judgment reductions he made to ACLU-NPP and ACLU-NC's time entries in this case, and agree with his methodology and judgments. In calculating the lodestar described below for all Plaintiff's counsel's timekeepers, Mr. Galvan has made appropriate billing judgment reductions.

81. Attached as **Exhibit M** is a table showing the summary of the total hours expended by all timekeepers from Plaintiffs' counsel – RBGG, ACLU-NPP, and ACLU-NC – before and after billing judgment reductions, as well as the total value of that time at market rates. Before billing adjustment reductions, Plaintiffs' counsel's expended over 15,000 professional hours, or over $7.1 million in fees during the period from March 2012 through mid-September 2015. Plaintiffs' counsel has written off a total of 1,699 hours, or 11% of its billable hours. This amounts to $560,972 in billing judgment reductions to assure that they have accounted for any undue duplication of effort or inefficiency. After these billing judgment reductions, Plaintiffs' counsel claims a total of 13,386 hours of compensable time for a total claimed lodestar of $6,590,144 for all work invested in this case through September 10, 2015. Plaintiffs' counsel's total lodestar fees and expenses through September 10, 2015 amount to $6,900,220. The Settlement Agreement cap of $4.8 million in fees and costs represents reduction of over 30% from the approximately $7 million in compensable time and costs incurred by Plaintiffs' counsel. Plaintiffs' counsel will make their complete time records available to Defendants and the Court, upon request, under the parties' Protective Order (Dkt. No. 401) relating to confidential information.

82. Plaintiffs' counsel are nationally recognized for their excellence in disability law, prisoner rights litigation, and complex class action litigation. *See, e.g.*, *L.H. v. Schwarzenegger*, 645 F. Supp. 2d 888, 895 (E.D. Cal. 2009) ("observ[ing] that Michael Bien has been recognized as a 'genuine expert in the area of complex, institutional prison reform litigation,' so as to merit exceptional fees") *citing Lucas v. White*, 63 F.Supp.2d 1046, 1061–62 (N.D. Cal. 1999). This experience has led courts throughout California and the nation, including the United States District Court for the Northern District, to award the firms that represent Plaintiffs fees at their full market rates, in part based on their superior experience and reputation. *See, e.g.*, *Armstrong v. Brown*, 805 F. Supp. 2d 918, 922 (N.D. Cal. 2011) (compelling defendants to pay RBGG's "reasonable 2010 hourly rates" including $800 for Sanford Rosen and $700 for Michael Bien); *Prison Legal News v. Schwarzenegger*, 608 F.3d 446, 455 (9th Cir. 2010) (affirming RBGG's requested 2008 rates, including $700 for Sanford Rosen); *L.H.*, 645 F. Supp. 2d at 895 (RBGG partners Bien, Grunfeld, and Galvan obtaining their 2008 rates: $640, $475, and $450, respectively). Similarly, the rate sought for work performed by paralegals and law students is reasonable and commensurate with prevailing market rates in the Bay Area. *See, e.g., Armstrong*, 805 F. Supp. 2d at 922 (compelling defendants to pay RBGG's paralegals at 2010 rates up to $240 per hour); *Prison Legal News v. Schwarzenegger*, 561 F. Supp. 2d 1095, 1105 (N.D. Cal. 2008) (awarding "between $160 and $170 for paralegals and law student interns").

83. Plaintiffs' counsel has spent nearly four years investigating and litigating the conditions at the Jail on a fully contingent basis, receiving no compensation for the duration of the action and fronting significant litigation expenses. Plaintiffs' counsel paid the wages of lawyers and other legal staff over the course of several years to fund the prosecution of this case. The time and labor required for this case, committed on a contingent basis, precluded Plaintiffs' counsel from productive work on other class action and complex litigation cases. The enormous costs and complexity of this litigation could not have been borne by the Plaintiff class and sub-class of indigent prisoners.

84. The unique intersection of legal issues presented by this case required considerable expertise in the provision of care to disabled individuals (whether medically, emotionally, or mentally disabled) in institutionalized settings to obtain the best outcome for the Plaintiff class and sub-class. Facts pertaining to these issues formed the common core of the case, and market rates for Plaintiffs' counsel are appropriate for their successful litigation of Plaintiffs' claims. Plaintiffs' counsel did not maintain separate billing numbers for each claim made by Plaintiffs (*i.e.*, one billing number for ADA-related claims, another for Rehabilitation Act claims, and another for Section 1983 claims). Plaintiffs' counsel challenged the Jail's failures to protect its prisoners in their entirety, and never treated the case as having distinct, individualized components such as some ADA components and other non-ADA components. This would be impracticable, given that issues regarding the Jail's provision of disability access, disability programming, medical health care, and mental health care services permeated all aspects of this case. Had Plaintiffs solely claimed violations of the ADA, the Rehabilitation Act, and California Government Code § 11135 (and not their federal or state constitutional claims), Plaintiffs' counsel would have performed the identical, or nearly identical, work.

85. Counsel's work on the ADA, Rehabilitation, and state law claims (including due process, equal protection, and the prohibitions against discrimination in state programs and cruel and unusual punishment) permeate all aspects of this action and cannot be reasonably divided from claims that would be capped at PLRA rates. Even if the Court decided on an arbitrary division between market and PLRA rates, it is likely that any reasonable allocation would result in an amount that would surpass the parties' agreed-upon $4.8 million award cap. For example, if the Court decided to allocate 50% of counsel's claimed time to PLRA rates and the other 50% to market rates, the total fees and expenses award would amount to $5,012,325 before any fee enhancement is taken into consideration

86. Plaintiffs agreed not to seek fees and expenses from the Court in an amount above $4.8 million, for fees and expenses incurred through Final Approval of the

Settlement Agreement, including approval of all Implementation Plans. Settlement Agreement ¶ 62. By limiting the calculation of Plaintiffs' counsel's lodestar to work performed through September 10, 2015, Plaintiffs' lodestar does not capture work performed drafting this motion and supporting papers. Nor does it take into account the work performed by Plaintiffs' counsel evaluating Defendants' proposed Implementation Plans and reviewing them with Plaintiffs' experts. I approximate that counsel has expended approximately 100 hours (or approximately $50,000) on these activities since September 10, 2015. Additionally, the parties have yet to agree to a set of Implementation Plans to submit to the Court for its approval. Based on the amount of time Plaintiffs' counsel has expended to date on the Implementation Plans, including time spent analyzing, reviewing with experts, and meeting and conferring with Defendants, I estimate that Plaintiffs' counsel will expend approximately 800 additional hours (or approximately $400,000) working on this matter prior to the Court's approval of all Implementation Plans.

RBGG'S REASONABLE AND NECESSARY COSTS AND EXPENSES

87. Plaintiffs' counsel fronted significant litigation expenses over the course of years. Hundreds of thousands of dollars were advanced by Plaintiffs' counsel for costs and expenses. Plaintiffs incurred costs and expenses of $310,075 in investigating and litigating this matter through September 10, 2015. **Exhibit N** includes a summary chart of all of RBGG's costs and expenses incurred through this time. **Exhibit O** is a summary of all Plaintiff firms' costs and expenses. These financial outlays include but are not limited to expenses related to copying, court reports, electronic discovery, expert consultants witnesses, interpreters, legal research, telephone calls, postage, service of process, and travel. I have reviewed the costs and expenses incurred by all Plaintiffs' firms, and believe each of the costs incurred was directly related and necessary to the prosecution of this case.

88. Plaintiffs paid significant costs and expenses associated with outside and in-house copying jobs. The charges for outside copying costs frequently included charges for other services that were necessary to process and utilize documents, including Bates

stamping, coding, uploading, payment for on-site copies of class member records and, in some cases, onsite copy services for Defendant-produced documents. (On-site copying is charged at $0.20 per page which is lower than the $0.25 per page customarily charged in the San Francisco Bay Area market.) Plaintiffs routinely sent a copying service to the Jail, for instance, in order to obtain prisoner health records. Defendants could not or would not copy these documents and records themselves in a timely manner. Plaintiffs' copying costs for the case also predictably increased during particularly busy times of the litigation. RBGG also advanced other costs as reflected in Exhibit N**,** including travel expenses, telephone charges (including the costs of conference calls), witness fees, and postage. It is RBGG's practice to bill our fee-paying clients for all of these expenses. This billing practice is consistent with the billing practices of lawyers practicing in the Northern District of California. With respect to conference calls, in particular, multi-party calls were essential for meet and confer sessions to discuss overall joint strategy, discovery issues, trial exhibits, pre-trial filings, and other litigation-related issues. It was also easier and more cost-effective for the multiple Plaintiffs' attorneys to communicate via conference calls rather than in person. All of these costs were necessary to prosecution of the case.

89. Plaintiffs paid significant costs and expenses associated with expert consultants. Dr. Pablo Stewart, with extensive experience in correctional mental health, submitted declarations in support of class certification and the motion for preliminary injunction. Dr. Robert L. Cohen, a board-certified medical doctor of internal medicine and an expert in the field of correctional medicine, also filed declarations in support of class certification and the preliminary injunction. Dr. Donald Sauter, toured the Jail in an inspection of all relevant activities, services, and operations related to dental care, including the accessibility of dental services to prisoners with disabilities, and was prepared to testify as an expert at trial. Wendy Still, accompanied by Plaintiffs' counsel, toured the jail in an inspection of all relevant activities, services, and operations related to custodial and disability operations, and was prepared to testify as an expert at trial. All of

these experts continue to provide services to plaintiffs' counsel, including the review and analysis of the implementation plans created by Defendants pursuant to the Settlement Agreement.

90. It is RBGG's consistent practice to bill our clients for computerized research charges, such as Westlaw, as well as interpreters, court reporters, long-distance telephone calls, faxes, investigators, and travel. It would not be appropriate to include these costs in our overhead as to do so would require a major increase in our firm's overall costs and billing rates when these costs are only required by a fraction of our clients and/or only some of the time during their case. This billing practice is consistent with the billing practices of lawyers practicing in the Northern District of California.

91. It is RBGG's practice to bill electronic discovery processing and database hosting to clients as litigation costs. This billing practice is consistent with the billing practices of lawyers practicing in the Northern District of California. In this case, where Plaintiffs were faced with a huge volume of produced documents and very short time-frames within which to review them, the use of the database was the most efficient and cost-effective way to litigate the case. If Plaintiffs did not utilize such a database, it would have been impossible to review and manage the huge volume of materials in this case, which included tens of thousands of pages of electronically-produced documents. The database allowed many fewer staff hours to review documents because it facilitated a "funnel" of only the most essential information into the eventual designation of deposition exhibits, trial-ready exhibits, and documents used to support motions and other filings. Once staff members reviewed documents, for instance, they could mark them as either useful in some way, pertinent to a particular issue in the case, useless to the case, or duplicative (defendants produced hundreds of duplicative documents). We then used these codes to exclude marked documents that had already been coded from various searches that attorneys and paralegals performed. It would have been impossible to review the huge volume of documents and to funnel information in this way without the document management system.

FEES AND EXPENSES IN CONNECTION WITH THIS FEES APPLICATION

92. Attached hereto as **Exhibit P** is a summary of the fees incurred in connection with this fees application, totaling approximately $55,600 as of September 27, 2015. I estimate that the completion of this fees application process will require another $20,000 in fees and expenses, for a total of approximately $75,000.

CONCLUSION

93. Based on my experience and on negotiations in this case, we have negotiated an agreement with Defendants to obtain the same comprehensive reforms Plaintiffs would be entitled to pursuant to a total victory at trial to be affirmed on appeal. The work described in this declaration was essential to obtaining this superior result for Plaintiffs.

I declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct, and that this declaration is executed at San Francisco, California this 2nd day of October, 2015.

/s/ Michael W. Bien
Michael W. Bien

EXHIBIT X

ROSEN BIEN
GALVAN & GRUNFELD LLP

101 Mission St. 6th Floor
San Francisco, California 94105
Telephone: (415) 433-6830 Fax: (415) 433-7104
FEIN: 94-3136812
www.rbgg.com
Gay C. Grunfeld
Email: ggrunfeld@rbgg.com

Brookdale Residents

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1

RE: Eidler et al. v. Brookdale Senior Living, Inc et al.

For Professional Services Rendered Through July 15, 2025

ACC0UNT SUMMARY

Matter	Description	Fees	Expenses	Billing Judgment Reductions	Total Due
000001	Eidler et al. v. Brookdale Senior Living, Inc et al.	$12,257,770.50	$1,116,924.97	($235,924.50)	$13,138,770.97
	Less 10% Additional Across The Board Reduction				*($1,202,184.60)*
	AMOUNT DUE				**$11,936,586.37**

Courtesy Discount is 11.73 %
of "gross" hours worked

ROSEN BIEN GALVAN & GRUNFELD LLP

101 Mission St. 6th Floor
San Francisco, California 94105
Telephone: (415) 433-6830 Fax: (415) 433-7104
FEIN: 94-3136812
www.rbgg.com

Brookdale Residents

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1

RE: Eidler et al. v. Brookdale Senior Living, Inc et al.

For Professional Services Rendered Through July 15, 2025

SERVICES

Date	Person	Description of Services	Hours	Discount
2/3/2017	GCG	(Billing Judgment) Conf w/ BS; run conflicts check.	0.0	0.5
2/3/2017	BBK	Preparations for prospective client meeting re: Brookdale.	0.4	
2/3/2017	BBK	Meeting w/ GCG re prospective client meeting re: Brookdale.	0.2	
2/3/2017	BBK	Prospective client meeting re: Brookdale w/ GCG.	1.5	
2/4/2017	GCG	Email to MH.	0.2	
2/24/2017	GCG	Conf w/ BBK re Brookdale.	0.2	
2/24/2017	BBK	Comm'ns w/ GCG re: meeting w/ Brookdale Fountaingrove Family Council.	0.2	
2/28/2017	BBK	(Billing Judgment) Comm'ns w/ GCG re: available weekend dates for meeting w/ Brookdale Fountaingrove Family Council.	0.0	0.2
2/28/2017	BBK	Draft/send email to MHelm re: dates for meeting w/ Brookdale Fountaingrove Family Council.	0.2	
2/28/2017	BBK	(Billing Judgment) Confirm all members of Brookdale Fountaingrove Family Council who are interested in attending meeting w/ GCG/BBK have already been cleared for conflicts.	0.0	0.1
3/3/2017	BBK	Review MHelm response regarding meeting with Brookdale Fountaingrove Family Council.	0.1	
3/6/2017	BBK	Communications with GCG regarding prior class action against Emeritus Corp (in prep for meeting with prospective clients from Brookdale Fountgaingrove Family Council).	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2017	BBK	Communications with FV regarding expected attendees for prospective client meeting (Brookdale Fountaingrove Family Council).	0.2	
3/17/2017	GCG	Prepare for Brookdale meeting; review documents, notes and pleadings.	1.0	
3/17/2017	GCG	Conference with and emails to BBK and FV regarding same.	0.5	
3/17/2017	BBK	Attend to compilation of materials for Brookdale Fountaingrove file.	0.2	
3/17/2017	BBK	Communications with GCG regarding preparations for prospective client meeting with Brookdale Fountaingrove Family Council.	0.2	
3/17/2017	BBK	Preparations for prospective client meeting with Brookdale Fountaingrove Family Council.	0.5	
3/19/2017	GCG	Prepare for and meet with families of potential clients.	1.7	
3/19/2017	GCG	Conference with and emails to BBK regarding same.	0.2	
3/19/2017	GCG	Attend to case set up.	0.1	
3/19/2017	BBK	Preparations for prospective client meeting with Brookdale Fountaingrove Family Council.	0.4	
3/19/2017	BBK	Conference with GCG in advance of prospective client meeting with Brookdale Fountaingrove Family Council.	0.2	
3/19/2017	BBK	Prospective client meeting with Brookdale Fountaingrove Family Council (w/ GCG).	1.8	
3/19/2017	BBK	Communications with GCG regarding next steps after prospective client meeting with Brookdale Fountaingrove Family Council.	0.1	
3/20/2017	BBK	Attend to supplemental conflicts check for additional Brookdale Fountaingrove Family Council Members.	0.3	
3/20/2017	FFV	(Billing Judgment) Assist in preparation of GCG's meeting with LC; print and copy docs regarding same.	0.0	0.5
3/20/2017	FFV	Draft case contact list.	0.4	
3/23/2017	GCG	Emails from SG regarding client documents.	0.1	
3/24/2017	GCG	Research and draft memo to file regarding Fact overview.	0.5	
3/24/2017	GCG	Legal research regarding potential claims.	0.2	
3/24/2017	GCG	Review and organize documents sent by MH and SG; conferences with and emails to FV regarding same.	0.3	
3/24/2017	GCG	Emails to SG and MH regarding additional evidence needed.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/24/2017	BBK	Review GCG communications with prospective clients and staff regarding obtaining relevant docs and preparing fact memo for this matter.	0.2	
3/24/2017	FFV	(Billing Judgment) PDF and save to the DMS clients' docs.	0.0	2.0
3/24/2017	FFV	(Billing Judgment) Telephone conversation with client MH re fedex shipment.	0.0	0.2
3/24/2017	FFV	(Billing Judgment) Arrange in alphabetical order list of witnesses in contacts; update same.	0.0	0.3
3/26/2017	GCG	Review client documents; email SG re same and re meeting potential plaintiff.	0.3	
3/27/2017	GCG	Conf w/ BBK re status.	0.1	
3/27/2017	GCG	Review witness emails and documents.	0.2	
3/27/2017	BBK	Conference with GCG regarding factual development of case.	0.1	
3/27/2017	FFV	(Billing Judgment) Print, save to the DMS client docs and prepare redwell for GCG.	0.0	2.0
3/28/2017	FFV	(Billing Judgment) Print, save to the DMS client docs and prepare redwell for GCG.	0.0	1.0
3/28/2017	FFV	(Billing Judgment) Prepare redwell for GCG re docs produced by MH; save to the DMS.	0.0	0.3
3/28/2017	FFV	Revise contact list.	0.1	
3/29/2017	FFV	Update contact list.	0.1	
3/29/2017	FFV	(Billing Judgment) Rename and save client's docs to the DMS.	0.0	0.2
4/2/2017	GCG	Research and draft memorandum to file regarding client interviews and notes.	0.4	
4/3/2017	BBK	Review article on recent California Appellate Court decision regarding availability of statutory penalty and punitive damages for violations of patients' rights under Health & Safety Code Sec 1430(b).	0.2	
4/3/2017	BBK	Review Brookdale Family Council emails regarding upcoming meeting forwarded by MH.	0.1	
4/4/2017	GCG	Conference with SG regarding named plaintiff interview.	0.1	
4/4/2017	GCG	Conference with BBK regarding client documents.	0.1	
4/4/2017	BBK	Conference with GCG regarding investigation and client retention.	0.1	
4/5/2017	FFV	(Billing Judgment) Scan, name and save to the DMS client's docs.	0.0	3.0

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2017	GCG	Review legal research and client documents.	0.5	
4/6/2017	GCG	Email with KK.	0.1	
4/6/2017	GCG	Conference with and emails to CDH re factual background; drafting complaint and analyzing contract for fraud.	0.5	
4/6/2017	GCG	Emails to SG and MH re status.	0.2	
4/6/2017	BBK	Communications with GCG/CH/FV regarding legal & factual research and next steps in this matter.	0.2	
4/6/2017	CDH	Review GCG and BBK notes re meeting with prospective clients.	0.2	
4/6/2017	CDH	Review client docs.	0.3	
4/6/2017	CDH	Conference w GCG re case assignment.	0.2	
4/6/2017	CDH	Legal research re mandatory arbitration clause.	1.7	
4/6/2017	FFV	(Billing Judgment) Download and save to the DMS complaint and notes.	0.0	0.2
4/6/2017	FFV	(Billing Judgment) Print from DMS docs to be produced; redact.	0.0	0.1
4/6/2017	FFV	(Billing Judgment) Download articles, pdf and save to the DMS.	0.0	0.2
4/6/2017	KES	Research information re Boice case.	0.5	
4/7/2017	GCG	Conference with LF re meeting.	0.1	
4/7/2017	GCG	Draft retention agreement.	0.1	
4/7/2017	GCG	Emails to BBK, CDH and team re named plaintiff and contract.	0.1	
4/7/2017	BBK	Communications regarding meeting with potential client LF & preparing retainer.	0.1	
4/7/2017	FGL	(Billing Judgment) Emails from/to GG re retainer agreement to LF and re exhibits, edit retainer agreement, type statement, and organize exhibits.	0.0	0.4
4/10/2017	GCG	Conf with CDH re legal research/arbitration issues.	0.2	
4/10/2017	GCG	Research and revise fact memo.	0.4	
4/10/2017	GCG	Review client documents and communications.	0.3	
4/10/2017	CDH	Review residency agreement and other client docs.	1.1	
4/10/2017	CDH	Legal research re arbitration clause, possible substantive claims.	1.9	
4/10/2017	CDH	Research and draft memo re residency agreement.	3.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2017	CDH	Conf w GCG re same.	0.3	
4/10/2017	FFV	Update contact list.	0.2	
4/10/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
4/11/2017	GCG	Meet with potential client LF.	2.0	
4/11/2017	GCG	Review LF documents and return to client.	0.5	
4/11/2017	GCG	Summarize LF facts in memorandum to file; conf and email to CDH re same.	0.5	
4/11/2017	GCG	Review Emeritus complaint.	0.2	
4/11/2017	GCG	(Reduced Charge) Travel to meeting with LF.	1.2	1.3
4/11/2017	BBK	Review GCG/CH communications regarding unconscionability of arbitration clause in resident contracts; GCG update regarding meeting w/ prospective client LFlugill.	0.1	
4/11/2017	CDH	Research and draft memo re residency agreement.	3.6	
4/11/2017	FFV	(Billing Judgment) Copy client's docs.	0.0	1.0
4/11/2017	FFV	(Billing Judgment) Finalize letter to LF, fedex LF's letter enclosing original doc back to the client; mail carbon copies to client's sisters.	0.0	0.4
4/12/2017	GCG	Revise memoranda to file re meetings w/ plaintiffs and family council members.	0.7	
4/12/2017	GCG	Emails to BBK and CDH re legal research and follow up.	0.4	
4/12/2017	BBK	Review MH report regarding negative reports about other Brookdale facilities.	0.1	
4/12/2017	BBK	Communications w/ GCG/CH regarding team meeting on case.	0.1	
4/12/2017	CDH	Review GCG's memo re meeting w/ LF.	0.3	
4/12/2017	CDH	Additional legal research re arbitration clause.	2.3	
4/12/2017	CDH	Draft and revise memo re residency agreement.	4.1	
4/12/2017	FFV	(Billing Judgment) Prepare working binder for GCG.	0.0	0.2
4/12/2017	FFV	(Billing Judgment) PDF and save doc to the DMS.	0.0	0.2
4/12/2017	KES	Create new CaseMap case.	0.2	
4/13/2017	GCG	Meet w/ KK re arb clauses and expert witnesses.	0.8	
4/13/2017	GCG	Conf w/ SG re family council meeting.	0.2	
4/13/2017	GCG	Draft memo to file re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2017	GCG	Draft memo to file re meeting w/ KK.	0.2	
4/13/2017	GCG	Research re CCLCs.	0.1	
4/13/2017	GCG	Prepare for meeting w/ team; emails to BBK and CDH re same.	0.2	
4/13/2017	BBK	Review GCG memos on meetings and phone calls w/ LF, Family Council members, and KKnapp.	0.4	
4/13/2017	CDH	Finish drafting memo re residency agreement.	6.1	
4/13/2017	CDH	Revise memo re residency agreement and circulate to GCG and BBK.	2.3	
4/13/2017	FGL	(Billing Judgment) Type memo to file from GG dictation.	0.0	0.3
4/14/2017	GCG	Research re ADA and related claims.	0.3	
4/14/2017	GCG	Conf w/ BBK and CDH re legal and factual research.	1.0	
4/14/2017	GCG	Conf w/ KES re same.	0.2	
4/14/2017	GCG	Research and draft retainer agreement.	1.0	
4/14/2017	GCG	Draft letter to LF.	0.3	
4/14/2017	GCG	Conf w/ KK re meeting w/ potential co-counsel; emails to partners re same.	0.5	
4/14/2017	GCG	Emails from SG and MH re Family Council meeting.	0.5	
4/14/2017	GCG	Review and analyze CDH memorandum.	0.9	
4/14/2017	BBK	Updating GCG memo regarding meetings w/ Family Council members to include further info from my atty notes.	1.5	
4/14/2017	BBK	Review GCG/CH emails discussing Winan court's order on judicial abstention barring equitable relief under the CLRA/UCL.	0.2	
4/14/2017	BBK	Review summary of CH's memo on applicability & enforceability of arbitration clause.	0.1	
4/14/2017	BBK	Team meeting w/ GCG/CH regarding case.	1.2	
4/14/2017	BBK	Communications w/ GCG regarding setting up call w/ ombudsman BEastes & meeting w/ potential co-counsel on 4/19.	0.1	
4/14/2017	BBK	Review Winans settlement to answer GCG query.	0.2	
4/14/2017	CDH	Review GCG's memo re meetings w clients.	0.5	
4/14/2017	CDH	Additional legal research re substantive claims.	1.1	
4/14/2017	CDH	Conf w GCG and BBK re arbitration agreement, next steps.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/14/2017	CDH	Research procedure for inspecting licensing records; call DSS to arrange appointment.	0.4	
4/14/2017	FFV	(Billing Judgment) Save scanned docs to the DMS/client docs.	0.0	1.0
4/14/2017	FFV	(Billing Judgment) Save docs to the DMS.	0.0	0.2
4/14/2017	FFV	(Billing Judgment) Work on GCG's edits on the retainer agreement.	0.0	1.0
4/14/2017	FFV	(Billing Judgment) Draft letter to LF re retainer agreement; finalize and send via fedex.	0.0	1.0
4/14/2017	KES	Confer GCG re new case and research tasks.	0.3	
4/14/2017	KES	Research Brookdale locations in Sonoma County and memo to team re same.	0.5	
4/14/2017	KES	Upload documents to CaseMap.	0.2	
4/14/2017	FGL	(Billing Judgment) Revise to do list per GG edits.	0.0	0.2
4/14/2017	FGL	(Billing Judgment) Email from/to and confer with GG re edits/formatting of memo to file, edit/format, proofread, and finalize same.	0.0	0.5
4/15/2017	CDH	Research ADA claims against senior living facilities.	1.0	
4/15/2017	CDH	Draft memo re ADA issues.	0.7	
4/16/2017	CDH	Additional legal research re ADA issues.	0.5	
4/17/2017	GCG	Conference and emails w/ Family Council members re continued investigation.	0.3	
4/17/2017	GCG	Conf w/ and emails to BBK, CDH, KES and FV re legal and factual research.	0.3	
4/17/2017	BBK	Preparation for call w/ Ombusdman BEastes.	0.2	
4/17/2017	BBK	Phone calls w/ BEastes re call on 4/18.	0.2	
4/17/2017	BBK	Conference w/ GCG regarding call w/ BEastes/CCelemedos of Senior Advocacy Services; preparation for meeting w/ potential co-counsel on 4/19.	0.2	
4/17/2017	BBK	Research regarding CLRA & EADACPA claims, remedies, and exhaustion reqs.	1.9	
4/17/2017	BBK	Conference w/ KES regarding researching prior litigation v. Brookdale for GCG.	0.1	
4/17/2017	BBK	Research/draft email memo to GCG regarding Senior Advocacy Services & Long-Term Care Ombudsman Program.	1.3	
4/17/2017	CDH	(Billing Judgment) Conflicts check.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2017	CDH	(Billing Judgment) (Billing Judgment) Download applicable statutes and save to DMS.	0.0	0.2
4/17/2017	CDH	Research and draft memo re ADA issues.	5.2	
4/17/2017	CDH	Additional research on ADA issues.	0.4	
4/17/2017	FFV	(Billing Judgment) Print, save to the DMS, and print a copy for GCG's binder.	0.0	0.2
4/17/2017	FFV	(Billing Judgment) Prepare GCG's working binder.	0.0	0.2
4/17/2017	KES	Conduct online research re suits against Brookdale.	1.2	
4/18/2017	GCG	Prepare for and conduct call w/ Ombubsman office and BBK.	0.5	
4/18/2017	GCG	Conf w/ potential plaintiffs re issues, retainer agreement.	1.5	
4/18/2017	GCG	Conf w/ and emails to SG re same and re meeting w/ Regional VP.	0.3	
4/18/2017	GCG	Review CDH memorandum re ADA; conf w/ CDH re same.	0.3	
4/18/2017	GCG	Prepare for meeting w/ potential co-counsel; review client documents.	0.8	
4/18/2017	GCG	Conf w/ CDH re licensing complaints.	0.1	
4/18/2017	BBK	Research regarding guardian ad litem & durable power of attorney for prospective clients by family members.	0.3	
4/18/2017	BBK	Preparation for phone conference w/ BEastes/CChelemedos of Senior Advocacy Services.	0.6	
4/18/2017	BBK	Phone conference w/ GCG & BEastes/CChelemedos of Senior Advocacy Services.	0.5	
4/18/2017	BBK	Draft memo regarding phone conference w/ BEastes/CChelemedos of Senior Advocacy Services.	1.2	
4/18/2017	BBK	Review Winan order granting in part motion to dismiss.	0.3	
4/18/2017	BBK	Research regarding exhaustion & pre-suit demand requirements for Elder Abuse Act.	1.5	
4/18/2017	BBK	Drafting memo on exhaustion/pre-suit demand requirements for likely claims & summary of elements of causes of action & remedies available under CLRA and Elder Abuse Act.	0.7	
4/18/2017	CDH	Review and analyze DSS licensing reports re Sonoma County Brookdale facilities.	3.2	
4/18/2017	CDH	Draft memo re DSS licensing reports.	1.5	
4/18/2017	CDH	Emails re authority to sign retainer agreement as guardian ad litem.	0.1	
4/18/2017	CDH	Review complaint in Florida case against Brookdale.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2017	FFV	(Billing Judgment) Print docs for GCG.	0.0	0.1
4/18/2017	KES	Research cases against Brookdale; email to team re same.	2.0	
4/19/2017	GCG	Review and analyze research memoranda re exhaustion, licensing issues and complaints; conference w/ BBK and CDH re same.	1.0	
4/19/2017	GCG	Research possible co-counsel background and cases.	0.2	
4/19/2017	GCG	Review client documents.	0.3	
4/19/2017	GCG	Prepare for and conduct meeting w/ KS, KK, GW and SC re potential statewide class-action.	2.0	
4/19/2017	BBK	Drafting memo on exhaustion/pre-suit demand requirements for likely claims & causes of action/remedies under CLRA and Elder Abuse Act.	1.6	
4/19/2017	BBK	Review response letter from KBowman (of Brookdale) to Family Council dated 4/7/17 (forwarded by SG).	0.1	
4/19/2017	BBK	Review CH report on recent Florida class action complaint located by KES; review KES reports regarding recent litigation v. Brookdlae she located.	0.2	
4/19/2017	BBK	Research regarding Kantor v. Kantor LLP per GCG query.	0.3	
4/19/2017	BBK	Review CH's updated tasklist.	0.1	
4/19/2017	BBK	Review CH memo on potential ADA Title III claim.	0.3	
4/19/2017	BBK	Review CH memo analyzing residency agreement & arbitration clause's enforceability.	0.6	
4/19/2017	BBK	Review CH memo regarding his initial review of DSS licensing complaints against Brookdale's Sonoma County facilities.	0.3	
4/19/2017	CDH	Update to do list.	0.2	
4/19/2017	CDH	Mtg w potential co-counsel.	2.0	
4/19/2017	CDH	Draft memo to GCG and BBK re Florida complaint against Brookdale.	0.5	
4/19/2017	CDH	Review client docs and draft summary of relevant facts for complaint.	2.8	
4/19/2017	FFV	(Billing Judgment) Rename and save doc to the DMS.	0.0	0.1
4/19/2017	FFV	(Billing Judgment) (Billing Judgment) Update contact list.	0.0	0.1
4/19/2017	FFV	(Billing Judgment) Arrange for United to pick up docs for scanning and naming for the DMS.	0.0	0.2
4/19/2017	FFV	(Billing Judgment) (Billing Judgment) Scan, name and save to the DMS letter for Grant re promised emails.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2017	FFV	Review client's hard copy docs.	2.0	
4/19/2017	FFV	(Billing Judgment) Rename letter.	0.0	0.3
4/19/2017	KES	Follow up email to team re Brookdale research.	0.2	
4/20/2017	GCG	Conf w/ JC re HC issues and class action goals.	0.8	
4/20/2017	GCG	Email to JC re same.	0.2	
4/20/2017	GCG	Conf w/ and email to MWB re ADA liability and research.	0.5	
4/20/2017	GCG	Conf w/ and email to CDH re licensing review and documents.	0.2	
4/20/2017	GCG	Email to BBK and CDH re meeting.	0.1	
4/20/2017	GCG	Research re co-counsel.	0.3	
4/20/2017	BBK	Review CH report regarding procedure for requesting facility's licensing file from DSS and his visit to DSS.	0.1	
4/20/2017	BBK	Communications w/ CH/GCG regarding team meeting on 4/21.	0.1	
4/20/2017	BBK	Conference w/ CH regarding meeting w/ lawyers from Stebner & Wallace and thoughts on ADA and Elder Financial Abuse claims.	0.4	
4/20/2017	BBK	Review MWB thoughts on potential ADA claims.	0.1	
4/20/2017	BBK	Review GCG report regarding communications w/ JC regarding becoming name Plaintiff and her continuing services contract w/out arbitration clause.	0.1	
4/20/2017	CDH	Review DSS licensing files (including roughly 2.8 hours driving to and from Rohnert Park).	3.5	
4/20/2017	CDH	Conf w BBK re potential statewide case.	0.6	
4/20/2017	CDH	Draft memo to team re DSS file review.	0.4	
4/20/2017	CDH	Additional review of client docs.	1.6	
4/20/2017	CDH	Research filings in similar RCFE cases.	1.2	
4/20/2017	FFV	(Billing Judgment) Scan, name and save to the DMS documents CH has obtained from the DSS Community Care Licensing Division office.	0.0	0.3
4/20/2017	KES	Online research re Brookdale marketing statements; confer CH re same.	1.5	
4/21/2017	GCG	Emails to BBK and CDH re plaintiff retention and meeting.	0.3	
4/21/2017	GCG	Revise and send letter and retention agreement to JC.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/21/2017	BBK	Communications w/ GCG regarding rescheduling team meeting; retainer agreements for clients.	0.1	
4/21/2017	CDH	Draft memo re similar RCFE cases.	2.2	
4/21/2017	CDH	Research substantive claims.	0.7	
4/21/2017	KES	Complete online research re Brookdale marketing statements and email to CH re same.	1.2	
4/24/2017	GCG	Conf w/ BBK and CDH re further legal research, drafting complaint and exhaustion of remedies.	1.1	
4/24/2017	GCG	Conf w/ GW and SC re Contra Costa v. Statewide claims; emails to CDH re same.	0.4	
4/24/2017	BBK	Preparation for meeting w/ CH/GCG.	0.1	
4/24/2017	BBK	Meeting w/ CH/GCG.	1.0	
4/24/2017	BBK	Post-meeting conference w/ CH regarding next steps.	0.1	
4/24/2017	BBK	Review GCG/CH communications regarding co-counseling on statewide class action against Brookdale & inclusion of ADA claims therein.	0.1	
4/24/2017	BBK	Review CA state law regarding pre-suit advisory requirements for raising disability access claims forwarded by GCG.	0.1	
4/24/2017	CDH	Mtg w GCG and BBK re case status and next steps.	1.2	
4/24/2017	CDH	Legal research re CLRA and elder abuse claims.	3.0	
4/24/2017	CDH	Continue drafting memo re similar RCFE cases.	1.2	
4/24/2017	CDH	Begin drafting complaint.	1.5	
4/24/2017	CDH	Emails w GCG re potential statewide case.	0.2	
4/25/2017	GCG	Email to CDH re drafting complaint.	0.1	
4/25/2017	BBK	Communications w/ CH regarding drafting complaint.	0.1	
4/25/2017	CDH	Legal research re CLRA claims.	1.5	
4/26/2017	GCG	Review and analyze emails and documents from potential plaintiffs and residents.	1.0	
4/26/2017	GCG	Conf w/ LF re serving as a plaintiff.	0.2	
4/26/2017	GCG	Emails to CDH and BBK re client updates and legal and factual research.	0.2	
4/26/2017	GCG	Research re co-counsel.	0.2	
4/26/2017	GCG	Emails to SG and MH re status.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2017	BBK	Comm'ns w/ KES/GCG re: prepping PRA Requests to Sonoma County Emergency Rooms and Fire Dep'ts.	0.1	
4/26/2017	BBK	Comm'ns w/ GCG/CH re: retaining clients.	0.2	
4/26/2017	CDH	Emails re named plaintiffs.	0.1	
4/26/2017	CDH	Draft complaint.	4.4	
4/26/2017	FFV	Update contact list.	0.1	
4/26/2017	KES	Begin online research re fire departments and ERs near Brookdale facilities.	1.8	
4/27/2017	GCG	Conf w/ CDH re complaint drafting and research.	0.2	
4/27/2017	GCG	Conf w/ JC re retention and scope of claims.	0.6	
4/27/2017	GCG	Draft memoranda to file re factual research.	0.7	
4/27/2017	GCG	Conf w/ potential plaintiffs at Windsor.	0.4	
4/27/2017	GCG	Emails to GW, KC and team.	0.2	
4/27/2017	GCG	Conf w/ LD re co-counseling.	0.2	
4/27/2017	BBK	Review GCG-SG comm'ns re: obtaining marketing materials from Brookdale Fountaingrove & staff logs/checklists re: medication & other services.	0.1	
4/27/2017	BBK	Comm'ns re: phone meeting w/ potential co-counsel.	0.1	
4/27/2017	BBK	Review GCG memos re: conversations w/ JC & LF & updates re: signing up prospective plaintiffs.	0.2	
4/27/2017	BBK	Review reports from SG & MH re: conversations w/ residents.	0.1	
4/27/2017	BBK	Review GCG memo re: call w/ prospective clients at Brookdale Windsor.	0.1	
4/27/2017	BBK	Attend to conflicts check re: prospective clients at Brookdale Windsor.	0.1	
4/27/2017	BBK	Review CH email re: his preliminary thoughts on our CPRA and elder financial abuse claims.	0.1	
4/27/2017	BBK	Review KES memo re: identified fire stations & ERs near Sonoma County Brookdale facilities & review/revise her draft PRA Requests to them.	0.4	
4/27/2017	CDH	Draft complaint.	2.9	
4/27/2017	CDH	Draft memo to GCG and BBK re overarching theories in complaint.	0.8	
4/27/2017	FFV	(Billing Judgment) Rename, pdf and save to the DMS client's doc.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2017	KES	Finalize memo re fire stations and hospitals near Brookdale facilities and draft PRA requests for same.	2.0	
4/28/2017	GCG	Conf w/ KC re serving as a class representative.	0.2	
4/28/2017	GCG	Conf w/ BBK re PRA requests.	0.2	
4/28/2017	BBK	Review/revise KES's draft PRA request to Fire Departments (including research re: PRA requests to ERs and Fire Dep'ts).	0.9	
4/28/2017	BBK	Attend to finalizing/mailing of PRA Requests to Fire Dep'ts (including comm'ns w/ KES re: this).	0.3	
4/28/2017	BBK	Phonecall w/ GCG re: PRA requests.	0.1	
4/28/2017	KES	Confer BBK re PRA requests, modify and serve same.	0.5	
5/1/2017	GCG	Prepare for and conduct conference call w/ KS, KK, GW, SC and CDH.	1.0	
5/1/2017	GCG	Conf w/ and email to BBK and KES re PRA requests.	0.2	
5/1/2017	GCG	Conf w/ KES re background research.	0.2	
5/1/2017	GCG	Review materials from JC.	0.3	
5/1/2017	GCG	Review and analyze Brookdale marketing materials; conf w/ CDH re same and re draft complaint.	0.5	
5/1/2017	GCG	Email w/ BBK re ADA violations.	0.2	
5/1/2017	BBK	Review GCG update re: co-counseling w/ GWallace; request that KES conduct background checks online of prospective clients.	0.1	
5/1/2017	BBK	Attend to calculating/calendaring of response deadline for Sonoma County Fire Dep'ts for PRA Request mailed on 4/28.	0.1	
5/1/2017	BBK	Review evidence sent by JC re: Brookdale billing practices highlighted by GCG.	0.1	
5/1/2017	BBK	Comm'ns w/ CH/GCG re: call w/ potential co-counsel.	0.1	
5/1/2017	BBK	Review Brookdale marketing brochure; report to GCG/CH re: ADA issue identified therein.	0.5	
5/1/2017	BBK	Review article re: proposed rule of prof resp re: clients w/ diminished capacity (including elders with dementia and related memory loss issues).	0.1	
5/1/2017	CDH	Phone conf w co-counsel re potential statewide case.	1.1	
5/1/2017	CDH	Conf w GCG re goals for call with co-counsel.	0.2	
5/1/2017	CDH	Continue drafting complaint.	0.4	
5/1/2017	KES	Calendar PRA request deadlines.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/1/2017	KES	Westlaw research.	0.7	
5/1/2017	KES	Review emails re case research.	0.1	
5/2/2017	GCG	Review client documents; emails to CDH re complaint drafting.	0.2	
5/2/2017	GCG	Conf w/ BBK re PRA requests.	0.1	
5/2/2017	GCG	Email w/ GW re co-counseling agreement.	0.2	
5/2/2017	GCG	Email JC and KC re co-counseling and retention agreement.	0.1	
5/2/2017	BBK	Review CH/MN comm'ns re: ADA & California disability law exhaustion reqs and applicability to our potential disability claims.	0.1	
5/2/2017	BBK	Comm'ns w/ KES re: prepping PRA requests to Sonoma County hospitals.	0.1	
5/2/2017	BBK	Conducting legal/factual research re: obtaining documentation of 911 calls for Brookdale residents via PRA requests to hospitals and law enforcement.	1.8	
5/2/2017	BBK	Conference w/ GCG re: PRA requests to hospitals and law enforcement.	0.2	
5/2/2017	BBK	Phonecall w/ records custodian of Sonoma County Fire & Emergency Services re: PRA Request mailed on 4/28.	0.1	
5/2/2017	BBK	Conduct factual research to confirm representation by records custodian of Sonoma CountY Fire & Emergency Services Dep't.	0.2	
5/2/2017	BBK	Comm'ns w/ KES/GCG re: sending PRA requests to individual fire districts.	0.2	
5/2/2017	BBK	Drafting PRA requests to fire dep'ts & law enforcement re: 911 calls.	1.6	
5/2/2017	BBK	Comm'ns re: entering co-counseling agreement w/ KStebner & GWallace.	0.1	
5/2/2017	CDH	Research ADA claims; draft outline re same.	6.4	
5/2/2017	KES	Finalize and send PRA requests to Sonoma County fire departments.	0.7	
5/3/2017	GCG	Conf w/ MH re factual background and next steps.	0.3	
5/3/2017	GCG	Emails to CDH re complaint.	0.2	
5/3/2017	GCG	Emails to BBK re PRA request.	0.1	
5/3/2017	BBK	Calculate/calendar response deadline for PRA Requests to fire dep'ts in Sonoma County.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/3/2017	BBK	Draft & attend to sending/calendaring of response deadlines for PRA Requests to Sonoma County law enforcement agencies seeking 911 calls.	0.5	
5/3/2017	BBK	Comm'ns w/ JLS re: obtaining paramedic runsheets.	0.1	
5/3/2017	BBK	Factual/legal research to plan approach to obtaining records from ERs or ambulance companies to ID who was brought from Brookdale facilities & determining that recommendation should be not to serve PRA Requests.	0.9	
5/3/2017	BBK	Conference w/ GCG re: recommendation not to mail PRA requests to ERs or ambulance companies.	0.1	
5/3/2017	CDH	Research ADA claims; draft outline re same.	2.2	
5/3/2017	KES	Calendar PRA request deadlines.	0.1	
5/4/2017	GCG	Conf w/ SG re factual developments.	0.2	
5/4/2017	GCG	Conf w/ LF re same.	0.2	
5/4/2017	GCG	Emails to KS and CDH re other lawsuit and complaint.	0.2	
5/4/2017	BBK	Comm'ns w/ KES re: mailing PRA Requests to Sonoma County law enforcement agencies & calendaring response deadline.	0.1	
5/4/2017	BBK	Comm'ns re: class action lawsuit re: staffing issues at Oakmont facilities.	0.1	
5/4/2017	KES	Send PRA requests to local law enforcement agencies and calendar deadline re same.	0.6	
5/5/2017	FFV	(Billing Judgment) Emails from/to JS re scanned docs to the thumb drive; phone call to United re same.	0.0	0.2
5/6/2017	GCG	Review notes from calls w/ witnesses and potential plaintiffs.	0.1	
5/7/2017	GCG	Review and analyze co-counseling agreement.	0.3	
5/7/2017	GCG	Research re co-counsel.	0.1	
5/8/2017	GCG	Emails w/ GW and KS re conference call.	0.2	
5/8/2017	GCG	Conf w/ and email to CDH re further research and next steps.	0.1	
5/8/2017	GCG	Review and revise co-counseling agreement.	0.1	
5/9/2017	GCG	Prepare for call w/ GW and KS.	0.2	
5/9/2017	GCG	Research re named plaintiffs.	0.1	
5/9/2017	GCG	Conf w/ BBK re 911 calls and PRA response.	0.1	
5/9/2017	GCG	Research re defendants finances.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2017	BBK	Review article on Brookdlae's reported net losses in Q1 2017 shared by GCG; comm'ns w/ MH re: article.	0.1	
5/9/2017	BBK	Listen to voicemail from Records Supervisor of Rohnert Partk Dep't of Public Safety (CGiordano) re: PRA Request; add her to contacts list.	0.2	
5/9/2017	BBK	Call w/ Records Supervisor of Rohnert Partk Dep't of Public Safety (CGiordano) re: PRA Request.	0.2	
5/9/2017	BBK	Draft/send confirming email to Records Supervisor of Rohnert Partk Dep't of Public Safety (CGiordano) re: PRA Request.	0.1	
5/9/2017	BBK	Updating GCG & CH re: call w/ Rohnert Partk Dep't Public Safety Records Supervisor CGiordano re: PRA Request.	0.2	
5/10/2017	GCG	Conf w/ GW and KS re co-counseling case and next steps.	0.5	
5/10/2017	GCG	Finalize co-counseling agreement; send to GW.	0.2	
5/10/2017	GCG	Set up next all counsel meeting; emails re same.	0.2	
5/10/2017	BBK	Comm'ns w/ GCG/CH re: meeting w/ co-counsel week of 5/15.	0.1	
5/10/2017	BBK	Comm'ns w/ SJR re: VM from Sonoma County Sheriff's Office re: PRA Request; updating contacts list.	0.2	
5/10/2017	BBK	Listen to VM from Sonoma County Sheriff's Office & left VM for them re: PRA Request.	0.1	
5/10/2017	BBK	Analysis of Winans Settlement Agreement and report to GCG re: who is part of the class and what claims were released.	0.4	
5/10/2017	CDH	Conf w GCG re availability for mtg w co-counsel.	0.1	
5/10/2017	FFV	(Billing Judgment) Scan Brookdale co-counsel agreement.	0.0	0.1
5/11/2017	GCG	Conf w/ Windsor plaintiff; arrange meeting.	0.3	
5/11/2017	GCG	Review and revise client retainer agreements.	0.4	
5/11/2017	GCG	Prepare for co-counsel meeting.	0.3	
5/11/2017	GCG	Email BBK re ombudsman follow up.	0.1	
5/11/2017	BBK	Review voicemails from various Sonoma County public entities re: PRA Requests.	0.2	
5/11/2017	BBK	Prep for call w/ Santa Rosa Police Department re: PRA Request.	0.1	
5/11/2017	BBK	Call w/ Santa Rosa Police Department re: PRA Request.	0.1	
5/11/2017	BBK	Prep for call w/ Sonoma Valley Fire & Rescue re: PRA Request.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/11/2017	BBK	Call w/ Sonoma Valley Fire & Rescue re: PRA Request (including failed attempt to reach & leaving VM).	0.2	
5/11/2017	BBK	Call w/ Sonoma County Sheriff's Office re: PRA Request.	0.2	
5/11/2017	BBK	Attend to preparation/scheduling of meeting w/ co-counsel on 5/18.	0.3	
5/11/2017	BBK	Review request for extension sent by Santa Rosa Police Dep't in response to PRA Request; assign FV/KES to calendar new deadline & save ltrs.	0.1	
5/11/2017	BBK	Update case contacts list to include new PRA contacts.	0.2	
5/11/2017	BBK	Draft memo to GCG/CH re: current status of PRA responses.	0.5	
5/11/2017	BBK	Review KKnapp report re: PRA requests to Community Care Licensing.	0.1	
5/11/2017	BBK	Prepare for F/U call w/ Senior Advocacy Services re: answers to questions posed to Ombudsmen on 4/18.	0.2	
5/11/2017	BBK	Failed attempt to reach Senior Advocacy Services per GCG request; update GCG.	0.2	
5/11/2017	FFV	(Billing Judgment) Rename and save to the DMS ltrs from CB.	0.0	0.2
5/11/2017	KES	Review responses to PRA requests.	0.1	
5/15/2017	GCG	Email to CDH and KK re PRA requests.	0.1	
5/15/2017	GCG	Emails from BBK re same.	0.1	
5/15/2017	GCG	Email to GW re co-counseling agreement.	0.1	
5/15/2017	BBK	Review PRA response ltr from Santa Rosa Fire Dep't; forward to team w/ recommended response.	0.2	
5/15/2017	BBK	Conference w/ CH re: planning for co-counsel meeting on 5/18; ADA claims.	0.1	
5/15/2017	BBK	Review PRA response from Sonoma County Sheriff's Office and forward to team.	0.2	
5/15/2017	BBK	Comm'ns w/ Sonoma County Fire & Rescue re: PRA Request.	0.2	
5/15/2017	BBK	Review PRA response from Sonoma County Fire & Rescue & forward to team.	0.1	
5/15/2017	BBK	Updating contacts list w/ public agency records contacts for PRA Requests.	0.2	
5/15/2017	CDH	Emails re PRA requests to CCL.	0.2	
5/15/2017	FFV	(Billing Judgment) Rename and save doc to the DMS.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2017	FFV	(Billing Judgment) Rename and save docs to the DMS.	0.0	0.3
5/15/2017	FFV	(Billing Judgment) Rename and save doc to the DMS.	0.0	0.1
5/15/2017	KES	Review document produced per PRA request.	0.1	
5/16/2017	GCG	Draft and send letter to clients re status and co-counseling; send retainer agreements.	1.4	
5/16/2017	GCG	Prepare for trip to Windsor to interview potential plaintiffs.	0.5	
5/16/2017	GCG	Conf w/ CDH re preparation for co-counsel meeting and legal research for same.	0.2	
5/16/2017	GCG	Emails to BBK and CDH re PRA responses and re factual development.	0.2	
5/16/2017	GCG	Conf w/ SG re Family Council issues and minutes.	0.5	
5/16/2017	BBK	Review minutes of 4/15 Brookdale Family Council Meeting sent by SG.	0.2	
5/16/2017	BBK	Call w/ CGiordiano (Records) of Rohnert Park Dep't of Public Safety re: responding to PRA Request re: fire department records.	0.2	
5/16/2017	BBK	Comm'ns re: preparations for meeting w/ co-counsel & retainers of clients.	0.2	
5/16/2017	BBK	Comm'ns w/ GCG/CH re: analysis of PRA responses.	0.1	
5/16/2017	BBK	Phone call w/ Santa Rosa City Atty re: PRA Request to Santa Rosa Fire Dep't & update team on response.	0.2	
5/16/2017	BBK	Follow-up comm'ns w/ Santa Rosa City Atty re: PRA Request to Santa Rosa Fire Dep't.	0.2	
5/16/2017	CDH	Conf w GCG re mtg w co-counsel.	0.1	
5/16/2017	CDH	Select prior memos to send to co-counsel.	0.6	
5/16/2017	FFV	Update addresses in retainer agreement.	0.2	
5/16/2017	FFV	Prepare retainer agreement for JC with exhibits for mailing.	0.5	
5/16/2017	KES	Email team re client contact information.	0.1	
5/17/2017	GCG	(Reduced Charge) Travel to and from Brookdale Windsor.	1.0	1.0
5/17/2017	GCG	Research and draft memorandum to file re same.	0.6	
5/17/2017	GCG	Revise agenda for co-counsel meeting; conf w/ CDH re same.	0.2	
5/17/2017	GCG	Review SC memoranda.	0.4	
5/17/2017	GCG	Inspect premises and meet w/ potential plaintiff RH.	2.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2017	BBK	Prepare assignment for SG to create chart of 911 calls rec'd by Sonoma County Sheriff from Brookdale Windsor and Brookdale Sonoma.	0.2	
5/17/2017	BBK	Failed attempt to reach CCelemedos at Senior Advocacy Services.	0.1	
5/17/2017	BBK	F/U call & email to Windsor Fire Protection District in light of failure to respond to PRA Request mailed on 5/2.	0.2	
5/17/2017	BBK	Prepare document tracking status of each PRA Request to public agencies and status of response and next steps.	0.8	
5/17/2017	BBK	Review CH draft agenda for 5/18 meeting w/ co-counsel.	0.2	
5/17/2017	BBK	Review memos forwarded by SColby of Schneider Wallace re: meetings w/ potential clients.	0.3	
5/17/2017	BBK	Preprations for co-counsel meeting (including review of CH notes on ADA and other disability claims.	0.4	
5/17/2017	CDH	Conf w GCG re mtg agenda.	0.3	
5/17/2017	CDH	Draft proposed agenda for mtg w co-cousnel.	0.7	
5/17/2017	CDH	Review mtg agenda per comments from GCG.	0.7	
5/17/2017	CDH	Draft outline re understaffing theory.	0.2	
5/17/2017	FFV	(Billing Judgment) Rename and save to the DMS client's docs.	0.0	0.2
5/18/2017	GCG	Review co-counsel memoranda re client and expert witness interviews.	0.6	
5/18/2017	GCG	Prepare for and conduct meeting w/ co-counsel; decide on legal theories and divide work.	1.7	
5/18/2017	GCG	Research re experts.	0.2	
5/18/2017	GCG	Revise memorandum to file re Windsor.	0.2	
5/18/2017	GCG	Review complaint from SG.	0.2	
5/18/2017	BBK	Review GCG/KKnapp comm'ns re: potential expert witnesses.	0.1	
5/18/2017	BBK	Review memos forwarded by KKnapp re: interviews w/ Brookdale residents and family members.	0.3	
5/18/2017	BBK	Conference w/ CH re: agenda for meeting w/ co-counsel.	0.2	
5/18/2017	BBK	Preparations for meeting w/ co-counsel.	0.6	
5/18/2017	BBK	Review SG's charts of 911 calls to Brookdale Windsor and Brookdale Sonoma; draft report on initial analysis to GCG/CH.	0.3	
5/18/2017	BBK	Review GCG memo re: meeting Brookdale Windsor resident on 5/17.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/18/2017	BBK	Meeting w/ co-counsel.	1.8	
5/18/2017	BBK	Review order denying motion to dismiss in Newith v. Aegis Senior Communities.	0.2	
5/18/2017	BBK	Review complaint about caregiver at Brookdale Fountaingrove; CH's notes from meeting & next steps; GCG update re: CGrunfeld report on potential experts.	0.2	
5/18/2017	CDH	Additiona legal research re ADA claims.	2.5	
5/18/2017	CDH	Review co-counsel's memos re San Ramon research.	1.1	
5/18/2017	CDH	Mtg w co-counsel.	1.8	
5/18/2017	CDH	Conf w BBK re prep for mtg w co-counsel.	0.3	
5/18/2017	CDH	Draft and circulate notes from mtg w co-counsel.	0.4	
5/18/2017	FFV	(Billing Judgment) Rename and save to the DMS client's memos.	0.0	0.5
5/19/2017	GCG	Outreach to plaintiffs.	0.2	
5/19/2017	GCG	Email to co-counsel re caregiver issues.	0.1	
5/19/2017	BBK	Call w/ CChelemedos of Senior Advocacy Services.	0.2	
5/19/2017	FFV	(Billing Judgment) Download, email, save to the DMS article from daily journal.	0.0	0.3
5/19/2017	FFV	(Billing Judgment) Rename and save to the DMS client's docs.	0.0	0.1
5/19/2017	FFV	(Billing Judgment) Rename and save to the DMS legal research.	0.0	0.1
5/21/2017	GCG	Email to MH and GW re patient left in wheelchair overnight.	0.1	
5/22/2017	GCG	Conf w/ CDH re draft complaint.	0.1	
5/22/2017	GCG	Emails from co-counsel re factual development.	0.1	
5/22/2017	BBK	Review report from MH re: Family Council meeting and reports from new members at Brookdale.	0.1	
5/22/2017	BBK	Review CH/KKnapp/SColby comm'ns re: drafting complaint.	0.1	
5/22/2017	CDH	Draft memo re ADA research and send to co-counsel.	2.4	
5/22/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
5/23/2017	GCG	Conference with KK regarding Fountaingrove family; email to KS regarding same.	0.2	
5/23/2017	GCG	Emails to MH and SG regarding family council issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/23/2017	GCG	Conference with KK regarding retention; emails to co-counsel and KK regarding standing and named plaintiffs.	0.4	
5/23/2017	GCG	Review JC spreadsheet.	0.3	
5/23/2017	GCG	Emails to KK and team regarding complaint drafting and factual development.	0.3	
5/23/2017	BBK	Communications regarding info from prospective Brookdale Fountaingrove plaintiffs.	0.1	
5/23/2017	BBK	Review Santa Cruz Sentinel article on state investigation into power outage at Brookdale Scotts Valley resulting in residents in W/Cs on ground floor unable to return to their rooms.	0.1	
5/24/2017	BBK	Check chart regarding status of PRA request responses from public agencies in Sonoma County; communications with CH regarding Disability Rights Bar email regarding nursing home residents' potential ADA claims.	0.1	
5/24/2017	FFV	(Billing Judgment) Rename and save doc to the DMS.	0.0	0.2
5/24/2017	FFV	(Billing Judgment) Download, convert to PDF and save to the DMS emailed article.	0.0	0.2
5/25/2017	GCG	Review and revise draft demand letter; emails w/ co-counsel re same.	0.4	
5/25/2017	GCG	Forward client factual data to team.	0.1	
5/25/2017	BBK	Review SGrant updates regarding info provided by Family Council to Brookdale Fountaingrove and info provided by administration to them.	0.1	
5/25/2017	BBK	Review draft demand ltr to Brookdale by GWallace/SColby and proposed revisions by KKnapp & CH.	0.3	
5/25/2017	CDH	Conference w GCG regarding edits to demand ltr.	0.3	
5/25/2017	CDH	Review and edit co-counsel's demand ltr; compile supplemental documents for co-counsel.	1.8	
5/25/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
5/26/2017	CDH	Conference w Kelly regarding elder abuse claims.	0.1	
5/26/2017	CDH	Review Kelly's memo regarding non-financial elder abuse claims; legal research regarding same; draft email to team regarding same.	0.7	
5/26/2017	CDH	Legal research regarding CLRA claim.	0.5	
5/28/2017	CDH	Legal research regarding CLRA claim.	0.9	
5/29/2017	CDH	Legal research regarding CLRA claim.	0.5	
5/30/2017	GCG	Review email from SC re class rep pick off.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/30/2017	BBK	Review KKnapp memo regarding potential elder abuse claim under Welfare & Inst Code 15610.07(a)(2).	0.2	
5/30/2017	BBK	Review PRA Response from Santa Rosa PD & assign FV to prepare cover ltr and mail check to obtain responsive records.	0.2	
5/30/2017	CDH	Conference w Kelly regarding additional work on complaint.	0.1	
5/30/2017	CDH	Draft CLRA allegations.	2.1	
5/30/2017	CDH	Review co-counsel's email regarding class rep; draft email responding to same.	2.1	
5/30/2017	KES	Review response to PRA request.	0.1	
5/31/2017	BBK	Review/revise cover ltr to Santa Rosa Police Dep't with check for responsive docs to PRA Request.	0.1	
5/31/2017	FFV	(Billing Judgment) Rename and save discovery docs to the DMS.	0.0	0.2
5/31/2017	FFV	Draft letter regarding check for doc request.	0.2	
5/31/2017	FFV	Finalize letter to City of Santa Rosa regarding check, mail, pdf and save to the DMS.	0.4	
5/31/2017	KES	Review response to PRA request and follow up re check for records.	0.2	
6/2/2017	GCG	Review and comment on demand letter; email CW and KS regarding same.	0.2	
6/2/2017	BBK	Review PRA Response from Rincon Valley & Windsor Fire; attend to payment of invoice.	0.1	
6/2/2017	BBK	Review report from SG regarding incident occuring at Fountaingrove.	0.1	
6/2/2017	CDH	Review final version of demand letter.	0.6	
6/4/2017	GCG	Review SC and CDH emails regarding fraud claims.	0.2	
6/4/2017	GCG	Emails to GW, KS and team regarding call to discuss same.	0.2	
6/5/2017	GCG	Review SG minutes and emails.	0.4	
6/5/2017	GCG	Emails to GW and team regarding same and regarding related fact issues.	0.2	
6/5/2017	GCG	Emails to KC and DR regarding retention agreement.	0.1	
6/5/2017	BBK	Review Communications regarding scheduling conference call with co-counsel; review/forward Brookdale Family Council Minutes for May 2017 meeting.	0.2	
6/5/2017	BBK	Communications with FV regarding invoice from Rincon Valley/Windsor Fire regarding PRA Response.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/5/2017	CDH	Draft CLRA allegations and incorporate co-counsel's elder abuse and class allegations.	3.9	
6/5/2017	CDH	Research Brookdale corporate staffing policies.	0.7	
6/5/2017	FFV	(Billing Judgment) Save docs to the DMS.	0.0	0.2
6/5/2017	FFV	Create subfolders to the DMS regarding third party responses to PRA.	0.2	
6/5/2017	FFV	Draft letter enclosing check regarding invoice; request check.	0.2	
6/5/2017	FFV	(Billing Judgment) Finalize, mail and save letter to DMS.	0.0	0.3
6/6/2017	GCG	Prepare for and conduct conference with CDH, KS, GK, SC and GW regarding fraud claims and client release.	0.6	
6/6/2017	GCG	Review and sign retention agreement; send to client.	0.1	
6/6/2017	GCG	Emails to SC and team regarding various residence agreements.	0.2	
6/6/2017	GCG	Email to DR regarding retainer.	0.1	
6/6/2017	CDH	Review and annotate docs in CaseMap.	2.9	
6/6/2017	CDH	Review client docs.	0.3	
6/6/2017	CDH	Additional research regarding CCL licensing reports.	2.1	
6/6/2017	CDH	Conference w GCG.	0.3	
6/6/2017	CDH	Phone Conference w co-counsel.	0.5	
6/6/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
6/6/2017	FFV	(Billing Judgment) Rename and save to the DMS emailed Brookdale residency agreements.	0.0	0.2
6/6/2017	FFV	Prepare executed amended class action retainer signed by GCG and Carlson, mail a copy of same.	0.5	
6/7/2017	GCG	Draft chart of plaintiffs and their issues; emails to CDH and KES regarding same.	0.2	
6/7/2017	GCG	Emails to DR regarding client documents.	0.2	
6/7/2017	MWB	Review GCG email regarding death issue.	0.1	
6/7/2017	BBK	Conference with CH regarding drafting complaint & PRA responses.	0.2	
6/7/2017	BBK	Research regarding permissibles fees by public agency for PRA responses in light of invoice received by Rincon Valley/Windsor Fire.	0.3	
6/7/2017	BBK	Phonecalls with records rep at Rincon Valley/Windsor Fire regarding invoice charging excessive fees for PRA response.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/7/2017	BBK	Update FV/GCG/CH regarding no need to pay Rincon Valley/Windsor Fire regarding invoice charging excessive fees for PRA response.	0.1	
6/7/2017	BBK	Assign SG to create chart of calls to Rincon Valley/Windsor Fire from Brookdale Fountaingrove and Brookdale Windsor, including date/time/incident type (translating code).	0.2	
6/7/2017	CDH	(Billing Judgment) Calendar dates based on date of demand letter.	0.0	0.2
6/7/2017	CDH	Draft CLRA and related allegations.	3.5	
6/7/2017	CDH	Additional review of CCL reports.	1.1	
6/7/2017	CDH	Review various versions of residency agreement and draft memo regarding same.	1.4	
6/7/2017	CDH	Emails regarding requesting additional documents from clients.	0.2	
6/7/2017	KES	Create chart regarding status of client retainers, other info; review documents and confer GCG regarding same.	0.6	
6/8/2017	GCG	Conference with and emails to CDH regarding legal and factual issues in drafting complaint.	0.5	
6/8/2017	GCG	Emails to DR regarding MJ contract.	0.3	
6/8/2017	GCG	Attend to retainer agreements.	0.3	
6/8/2017	BBK	Communications with SG regarding her progress on chart of PRA responses from Rincon Valley/Windsor Fire regarding calls from Brookdales Fountaingrove & Windsor.	0.1	
6/8/2017	CDH	Conference w GCG regarding status of complaint.	0.5	
6/8/2017	CDH	Draft CLRA and related allegations.	1.3	
6/8/2017	CDH	Emails w co-counsel regarding class reps.	0.2	
6/8/2017	CDH	Review client docs.	0.3	
6/8/2017	CDH	Review filings in similar past cases.	0.1	
6/8/2017	FFV	(Billing Judgment) Scan, name and save to the DMS client docs; print same.	0.0	0.2
6/8/2017	FFV	Put together amended class action agreement signed by GCG and KC.	0.5	
6/9/2017	GCG	Emails to DR and CDH regarding disability issues and contract.	0.2	
6/9/2017	GCG	Attend to retention agreements.	0.1	
6/9/2017	GCG	Work on plaintiff tracking chart.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/9/2017	FFV	(Billing Judgment) Save RCFE contract to the DMS.	0.0	0.1
6/9/2017	FFV	Put together amended class action agreement signed by GCG and DR.	0.3	
6/9/2017	FFV	Draft letter to KC enclosing unsigned named plaintiffs' form; finalize and mail.	0.5	
6/9/2017	FFV	(Billing Judgment) Rename and save to the DMS emailed clients docs.	0.0	0.2
6/9/2017	KES	Brief review of response to PRA request.	0.1	
6/11/2017	GCG	Review and analyze JC memo regarding HC care; forward to co-counsel; email with JC regarding disability accommodations.	0.5	
6/12/2017	GCG	Conference with SG regarding status.	0.1	
6/12/2017	GCG	Attempt to reach former employee.	0.1	
6/12/2017	GCG	Emails to JC and team regarding Fountaingrove accessibility.	0.4	
6/12/2017	BBK	Review SG's chart of PRA Responses from Rincon Valley & Windsor Fire regarding fire department calls for service from Brookdale Windsor.	0.2	
6/12/2017	FFV	(Billing Judgment) Save discovery docs to the DMS.	0.0	0.2
6/13/2017	GCG	Conference with CDH re plaintiffs' background and status of draft complaint.	0.2	
6/13/2017	GCG	Conference with RH re food and ADA accessibility at Windsor.	0.2	
6/13/2017	BBK	Communications with CH & SG regarding chart of request for assistance to fire department from Brookdale Windsor; PRA response from Santa Rosa PD rec'd.	0.2	
6/13/2017	CDH	Conference w GCG.	0.1	
6/13/2017	CDH	Draft CLRA and related allegations.	4.5	
6/14/2017	GCG	Research re Brookdale sale; email KS and Conference w. GW re same.	0.2	
6/14/2017	GCG	Review draft complaint.	0.5	
6/14/2017	GCG	Emails team re same.	0.2	
6/14/2017	GCG	Conference with LF re status.	0.1	
6/14/2017	GCG	Email DR re MJ residency agreement.	0.1	
6/14/2017	BBK	Communications with GCG/CH/co-counsel regarding target deadline to distribute drafts and to file complaint.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/14/2017	CDH	Draft CLRA and related allegations.	4.8	
6/15/2017	GCG	Research and revise draft complaint.	2.5	
6/15/2017	GCG	Emails to GW re same.	0.5	
6/15/2017	GCG	Conferences with KK and CDH re same.	0.5	
6/15/2017	GCG	Research re Brookdale sale.	0.2	
6/15/2017	GCG	Emails to clients and co-counsel re document review and gathering.	0.8	
6/15/2017	CDH	Continue drafting CLRA allegations.	1.8	
6/15/2017	CDH	Conf w GCG; compile and send relevant drafts of complaint to GCG.	0.4	
6/15/2017	FFV	(Billing Judgment) Scan, mail and save to the DMS fully executed retainer agreement for KC.	0.0	0.3
6/16/2017	GCG	Continued review and revision of draft complaint.	0.5	
6/16/2017	GCG	Conference with and emails to CDH re same.	0.2	
6/16/2017	GCG	Initial review of MJ documents.	0.1	
6/16/2017	CDH	Review GCG's edits to draft complaint; add NBs and further comments.	2.1	
6/16/2017	CDH	Conf w MLF re mandatory arbitration.	0.3	
6/16/2017	CDH	Review MJ client docs.	0.4	
6/16/2017	MLF	(Billing Judgment) Conf. w/CH re: arbitration clause.	0.0	0.4
6/16/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
6/17/2017	GCG	Research and revise draft complaint.	2.4	
6/17/2017	GCG	Email to CDH, JC and DR re factual research and follow up.	0.5	
6/17/2017	GCG	Conference with DR re M-CJ's care at Brookdale Fountaingrove.	0.5	
6/17/2017	CDH	Edit CLRA and UCL causes of action.	0.8	
6/17/2017	CDH	Emails w GCG re outstanding issues in draft complaint.	0.8	
6/17/2017	CDH	Research re CLRA exhaustion; draft memo to GCG re same.	0.7	
6/18/2017	GCG	Research and revise draft complaint.	2.0	
6/18/2017	GCG	Emails to BBK, CDH and co-counsel re follow-up research and revisions.	1.0	
6/18/2017	GCG	Draft memorandum to file re call with DR.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/18/2017	BBK	Review communications regarding timing of filing of complaint and whehter to amend to add damages claims.	0.1	
6/19/2017	GCG	Review and analyze KK memorandum re effect of Brookdale sale.	0.2	
6/19/2017	GCG	Revise memorandum to file re M-Cg information.	0.1	
6/19/2017	GCG	Emails from GW re revising complaint.	0.1	
6/19/2017	BBK	Review GCG's internal to-do list for finalizing complaint & communications with CH regarding addressing them.	0.1	
6/19/2017	FFV	(Billing Judgment) Rename and save docs to the DMS.	0.0	0.2
6/19/2017	KES	Update electronic files.	0.1	
6/20/2017	GCG	Prepare for and conduct conference w/ GW, JU, KS, KK and CDH re timing of complaint and revisions to draft; followup emails re next steps; review GW ADA complaint.	1.3	
6/20/2017	GCG	Conf w/ KC re mother's needs and bills.	0.3	
6/20/2017	GCG	Revise memo to file re conversation w/ DR re MCJ; circulate to team.	0.2	
6/20/2017	GCG	Conf w/ RH re Windsor issues.	0.2	
6/20/2017	GCG	Conf w/ KES re organizing documents and revising plaintiff trucking chart.	0.2	
6/20/2017	GCG	Prepare fully executed retainer for plaintiff.	0.2	
6/20/2017	CDH	Phone conf w/ co-counsel.	0.8	
6/20/2017	CDH	Review co-counsel's draft of ADA and Unruh Act material.	0.3	
6/20/2017	CDH	(Billing Judgment) Calendar projected review and filing dates.	0.0	0.1
6/20/2017	FFV	Organize retainer agreement folder re executed versions.	0.3	
6/20/2017	FFV	(Billing Judgment) Print email and attachment for GCG's binder.	0.0	0.1
6/20/2017	KES	Gather client information and confer GCG re same; follow up review of client status information and update chart re same.	0.9	
6/21/2017	CDH	Review recent Court of Appeal case re power of attorney; draft memo to GCG re same.	0.1	
6/21/2017	FFV	(Billing Judgment) Add actual dates of clients' docs that are already saved in the DMS, not the received date.	0.0	0.3
6/21/2017	KES	Review CaseMap and consider issues for tracking class member status.	1.0	
6/22/2017	GCG	Emails to KS and GW re document retention letter.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/22/2017	CDH	Review Kirola 9th Cir opn.	0.2	
6/23/2017	GCG	Emails from KS re Brookdale insurance and other issues.	0.1	
6/26/2017	GCG	Emails to SC and CDH re guardian ad litem and venue issues.	0.2	
6/26/2017	GCG	Email to JC re caregiver issues; poor training.	0.2	
6/26/2017	BBK	Review comm'ns w/ team re: obtaining Civ Code Sec 1780(d) declarations from named plaintiffs & guardian ad litem appointments.	0.1	
6/26/2017	CDH	Research issue of multiple guardians ad litem and draft memo to team re same.	1.0	
6/27/2017	GCG	Emails to GW and team re draft complaint and related legal issues.	0.3	
6/27/2017	GCG	Prepare for call w/ co-counsel.	0.1	
6/28/2017	GCG	Review and analyze GW questions re complaint; conf w/ GW, SC, JM, KK and CDH re same.	1.0	
6/28/2017	GCG	Conf w/ CDH re revisions to draft complaint.	0.3	
6/28/2017	GCG	Emails to SG and GW re facts.	0.2	
6/28/2017	CDH	Phone Confs w co-counsel re draft complaint.	1.1	
6/28/2017	CDH	Additional research and drafting for complaint.	2.5	
6/29/2017	CDH	Further edits to draft complaint.	3.7	
6/30/2017	GCG	Confs w/ KK re revisions to complaint.	0.1	
6/30/2017	GCG	Email from KS re response from opposing counsel.	0.1	
7/1/2017	GCG	Emails to KK and CDH re revisions to draft complaint and CLRA issues.	0.2	
7/1/2017	GCG	Begin review of revised complaint.	0.3	
7/1/2017	CDH	Emails w GCG and KK re CLRA damages.	0.2	
7/2/2017	GCG	Review and revise draft complaint.	1.2	
7/2/2017	GCG	Draft list of questions for follow up; prepare for team meeting.	1.0	
7/3/2017	GCG	Review and revise draft complaint.	0.6	
7/3/2017	GCG	Fact research for same.	0.2	
7/3/2017	GCG	Emails to CDH and KK re same.	0.3	
7/3/2017	GCG	Draft email to GW and team re issues to address in draft complaint.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/3/2017	GCG	Email to JC re status.	0.1	
7/3/2017	GCG	Email to KC and DR re status.	0.1	
7/3/2017	GCG	Email to SG re status.	0.1	
7/3/2017	CDH	Emails re GCG's research questions.	0.6	
7/4/2017	GCG	Email KK and CDH re meeting.	0.1	
7/5/2017	GCG	(Reduced Charge) Travel to participate in meeting at co-counsel's office re revisions to draft complaint and overall strategy.	0.5	0.5
7/5/2017	GCG	Conf w/ and emails to CDH and BBK re further research.	0.3	
7/5/2017	GCG	Review and analyze Hutchenson decision and implications for named plaintiffs; email team re same.	1.0	
7/5/2017	GCG	Email CW re witnesses.	0.2	
7/5/2017	GCG	Conf w/ JC re visit to HC and review of complaint.	0.2	
7/5/2017	GCG	Email to KC and DR re complaint.	0.1	
7/5/2017	GCG	Email to GW and team re retainer agreement.	0.2	
7/5/2017	GCG	Prepare to and participate in meeting at co-counsel's office re revisions to draft complaint and overall strategy.	3.0	
7/5/2017	BBK	Communication w/ GCG re: upcoming tasks; review GCG-CWhitaker communication re: case.	0.1	
7/5/2017	CDH	Meeting w GCG and co-counsel re complaint.	2.5	
7/5/2017	CDH	(Reduced Charge) Travel to co-counsel meeting.	0.6	0.6
7/5/2017	FFV	Organize GCG's working binder.	0.2	
7/5/2017	KES	Review organization of client and CaseMap documents.	0.4	
7/6/2017	EG	Respond to questions re GAL for Brookdale clients.	0.1	
7/6/2017	GCG	Review Family Counsel minutes and client emails; send summary to team.	0.3	
7/6/2017	GCG	Conf w/ JC and email re visit to HC.	0.2	
7/6/2017	GCG	Conf w/ and email to DR re visit to MCJ.	0.3	
7/6/2017	GCG	Emails to CDH, BBK and team re draft complaint.	0.2	
7/6/2017	GCG	Research and draft email re power of attorney and GAL issues.	0.5	
7/6/2017	GCG	Conf w/ SC re same.	0.2	
7/6/2017	GCG	Begin work on GAL declarations.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/6/2017	BBK	Review KKNapp memo re: availability of attorney fees for Defendants under CLRA and Elder Financial Abuse claims.	0.1	
7/6/2017	FFV	Attend to JC's power of attorney.	0.2	
7/6/2017	FFV	(Billing Judgment) Rename and save to the DMS letter re notice.	0.0	0.1
7/6/2017	KES	Update CaseMap.	0.2	
7/7/2017	GCG	Revise draft complaint.	0.2	
7/7/2017	GCG	Review client documents.	0.1	
7/7/2017	GCG	Conf w/ BBK re cite-checking complaint.	0.1	
7/7/2017	GCG	Emails to SC re next steps.	0.1	
7/7/2017	GCG	Prepare for client meetings.	0.2	
7/7/2017	GCG	Research and draft guardian ad litem declaration.	0.2	
7/7/2017	BBK	Comm'ns w/ GCG re: cite-check and fact-check of complaint prior to 7/13 filing.	0.1	
7/7/2017	KES	Update electronic documents files.	0.4	
7/7/2017	FGL	(Billing Judgment) Confer with GCG re edits to draft Complaint and edit/format same.	0.0	0.2
7/7/2017	FGL	(Billing Judgment) Email from/to GCG re guardian ad litem declarations and edit/format same.	0.0	0.3
7/8/2017	GCG	(Reduced Charge) Travel to Fountaingrove.	1.0	1.0
7/8/2017	GCG	Meet w/ DR, KC, MCJ, RC, JC and HC.	2.8	
7/9/2017	GCG	Emails to JC and team re pill problem and revisions to draft complaint.	0.2	
7/10/2017	GCG	Conf w/ and emails to SC and team re revised complaint; issues.	0.5	
7/10/2017	GCG	Conf w/ BBK, CDH and CW re same.	0.5	
7/10/2017	GCG	Revise draft complaint.	0.3	
7/10/2017	GCG	Work on GAL declaration; email JC and SC re same.	0.2	
7/10/2017	GCG	Research and draft memorandum to file re visit to Fountaingrove.	0.5	
7/10/2017	GCG	Review and circulate Fountaingrove documents.	0.2	
7/10/2017	BBK	(Billing Judgment) Comm'ns w/ GCG/CH re: phone Confs on tasks needed to finalize complaint.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
7/10/2017	BBK	Phone Confs w/ GCG/CH on tasks needed to finalize complaint.	0.2	
7/10/2017	BBK	Comm'ns w/ co-counsel re: finalizing complaint & Guardian Ad Litem applications.	0.2	
7/10/2017	BBK	Comm'ns w/ co-counsel re: press outreach to identify additional putative class members.	0.1	
7/10/2017	FFV	(Billing Judgment) Scan, save to the DMS and email articles from defendant to GCG.	0.0	0.3
7/10/2017	FFV	(Billing Judgment) Save docs to the DMS.	0.0	0.1
7/10/2017	KES	Confer team re complaint filing.	0.1	
7/11/2017	GCG	Review Frontline documentary on assisted living problems.	0.5	
7/11/2017	GCG	Conf w/ DR re revisions to factual allegations of draft complaint; revise same.	0.5	
7/11/2017	GCG	Confs w/ BBK and CDH re fact and cite checking complaint.	0.5	
7/11/2017	GCG	Legal research re Probate Code/mental capacity.	0.2	
7/11/2017	GCG	Draft and revise guardian ad litem declarations; emails GW, SC and team re same.	1.0	
7/11/2017	GCG	Emails to CW and team re filing of complaint.	0.3	
7/11/2017	GCG	Review voicemail from opposing counsel; run supplemental conflicts check.	0.2	
7/11/2017	GCG	Revise draft complaint.	0.5	
7/11/2017	LAE	Emails with GG re SOL for Title III.	0.1	
7/11/2017	BBK	Cite-checking and proof-reading draft complaint (including Confs w/ GCG re: cite-check.	0.8	
7/11/2017	BBK	Comm'ns w/ GCG/CH/CW re: draft press release and revisions thereto.	0.2	
7/11/2017	CDH	Final review and citecheck of complaint.	5.1	
7/11/2017	CDH	Legal research re adequacy of CLRA notice.	0.3	
7/11/2017	CDH	Review and comment on draft press release.	0.2	
7/11/2017	KES	Update contacts.	0.2	
7/11/2017	KES	Cite check portion of complaint re factual allegations; confer CH re same.	1.9	
7/11/2017	FGL	(Billing Judgment) Confer with GCG re edits to guardian ad litem applications of J. Carlson and K. Clapper and edit same.	0.0	0.6

SERVICES

Date	Person	Description of Services	Hours	Discount
7/12/2017	GCG	Revise GAL declarations; emails to clients and co-counsel re same.	1.0	
7/12/2017	GCG	Conf w/ SC and GW re amended complaint.	0.5	
7/12/2017	GCG	Emails to CW, SC, GW and team re filing complaint and GAL motion.	1.0	
7/12/2017	GCG	Review KES summary of Santa Rosa PRA request; circulate to team.	0.3	
7/12/2017	GCG	Emails re outreach to class members and former employees.	0.2	
7/12/2017	LAE	(Billing Judgment) Research re Title III SOL and emails with GG re same.	0.0	0.2
7/12/2017	BBK	Review/forward PRA response from Santa Rosa Fire Dep't; Comm'ns w/ GCG & KES re: reviewing data & including in amended complaint.	0.2	
7/12/2017	BBK	Comm'ns w/ GCG & co-counsel re: finalizing/filing complaint & press strategy.	0.2	
7/12/2017	FFV	(Billing Judgment) Rename and save PRA from Santa Rosa.	0.0	0.1
7/12/2017	KES	Review and analyze Santa Rosa Fire Dept PRA response and email to team re same.	1.0	
7/12/2017	KES	Update electronic press file.	0.1	
7/12/2017	KES	Review emails re complaint filing.	0.2	
7/13/2017	GCG	Revise and finalize GAL declarations.	1.0	
7/13/2017	GCG	Confs w/ GW and SC re revisions to complaint and CC 1780 issues.	0.5	
7/13/2017	GCG	Confs w/ and emails to CW re outreach.	0.5	
7/13/2017	GCG	Conf w/ KES re class member calls.	0.2	
7/13/2017	GCG	Conf w/ and emails to CDH re revisions to complaint.	0.2	
7/13/2017	GCG	Email to KK re same.	0.1	
7/13/2017	GCG	Conf w/ JC re same.	0.1	
7/13/2017	GCG	Emails to clients and family council re complaint as filed; emails to GW and team re same.	0.3	
7/13/2017	BBK	Comm'ns w/ GCG/CH/opposing counsel re: finalizing complaint, press release, and guardian ad litem decls.	0.2	
7/13/2017	BBK	Comm'ns w/ CH re; status of complaint.	0.2	
7/13/2017	BBK	Review final draft complaint.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/13/2017	CDH	Review final version of complaint; verify client-specific allegations through ref to client docs.	1.5	
7/13/2017	FFV	(Billing Judgment) Put together signed ad litem, save in the DMS and email to GCG.	0.0	1.0
7/13/2017	KES	Review press release and emails re filing of complaint.	0.3	
7/14/2017	GCG	Review filed complaint, Confs w/ CW re same.	0.3	
7/14/2017	GCG	Emails to clients and family counsel members re filing.	0.2	
7/14/2017	GCG	Emails to SC and team re ECF; Judge's standing order, press outreach and administrative motion.	0.5	
7/14/2017	GCG	Oversee preparation of pleading file.	0.1	
7/14/2017	GCG	Research re Judge's standing orders.	0.1	
7/14/2017	GCG	Revise case contacts list; emails to KES re same.	0.1	
7/14/2017	BBK	Comm'ns w/ team re: filing of complaint & guardian ad litem applications; issuance of press release.	0.2	
7/14/2017	BBK	Comm'ns w/ team re: assignment of Judge Donato.	0.2	
7/14/2017	BBK	Review updated tasklist for case.	0.1	
7/14/2017	CDH	Update to-do list.	0.4	
7/14/2017	KES	Email with team re appearance.	0.2	
7/14/2017	KES	Brief review of complaint and judge standing orders.	0.3	
7/16/2017	GCG	Email w/ MH re potential witness.	0.1	
7/16/2017	GCG	Review SHN report on lawsuit.	0.1	
7/17/2017	GCG	Emails w/ SC and team re additional retainer agreements; court orders; notice of appearance.	0.1	
7/17/2017	GCG	Conf w/ CW re outreach.	0.1	
7/17/2017	GCG	Review SR Housing News article.	0.1	
7/17/2017	GCG	Oversee pleading file.	0.1	
7/17/2017	BBK	Review article on complaint in Senior Housing News; review MH emails re: additional prospective class members; review CH report re: assigned judge.	0.2	
7/17/2017	FFV	(Billing Judgment) Download article "Brookdale Faces First of its Kind ADA Lawsuit" and save to the DMS.	0.0	0.2
7/17/2017	KES	Organize working case documents.	0.2	
7/17/2017	KES	Review scheduling order and update electronic file.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/18/2017	GCG	Revise and oversee filing of notices of appearance.	0.1	
7/18/2017	GCG	Review GO 56 and standing orders; emails to KES and team re same and re pleading file and calendaring.	0.2	
7/18/2017	GCG	Conf w/ DR re status.	0.1	
7/18/2017	GCG	Email JB re status.	0.1	
7/18/2017	GCG	Review and sign client retention agreements; emails to SC and team re same.	0.1	
7/18/2017	GCG	Email MH re outreach witness.	0.1	
7/18/2017	BBK	Comm'ns w/ team re: filing notices of appearances; Comm'ns w/ GCG re: weekly meeting.	0.1	
7/18/2017	BBK	Review press coverage of filing of complaint published today.	0.2	
7/18/2017	CDH	Review draft notice of appearance.	0.1	
7/18/2017	CDH	Emails w GCG re clients' monthly rates.	0.1	
7/18/2017	FFV	((Billing Judgment) Scan, save to the DMS and email to GCG signed class action retainer agreement of BH and LV.	0.0	0.4
7/18/2017	KES	File Notice of Appearance and update ECF noticing re same.	0.3	
7/18/2017	KES	Download missing pleadings and update electronic files re same.	0.2	
7/18/2017	KES	Update electronic press file.	0.2	
7/19/2017	GCG	Emails with SC and team re meeting to discuss discovery, service and related issues.	0.3	
7/19/2017	GCG	Emails with KES and team re document review.	0.1	
7/19/2017	GCG	Review and circulate CHD memo re call from Brookdale employee.	0.1	
7/19/2017	GCG	Confs with SG re witness; update witness list.	0.3	
7/19/2017	GCG	Email clients re status.	0.3	
7/19/2017	BBK	Review CH memo re: anonymous call re: Brookdale case.	0.1	
7/19/2017	KES	Organize electronic client documents.	0.3	
7/19/2017	KES	Download and circulate pleading.	0.1	
7/19/2017	KES	Review scheduling order and calendar deadlines re same.	0.3	
7/20/2017	GCG	Email GW and team re fact research, proofs of service and upcoming meeting.	0.2	
7/20/2017	GCG	Review KES report of call.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/20/2017	GCG	Review and respond to emails from class members.	0.2	
7/20/2017	GCG	Emails with BBK, CDH, KES re tracking our factual investigation.	0.1	
7/20/2017	BBK	Comm'ns w/ JUhrowczik re: PRA responses to public entities re: 911 calls from Brookdale facilities.	0.1	
7/20/2017	BBK	Review KES memo to team re: call from former Brookdale employee.	0.1	
7/20/2017	BBK	Review emails re: contacts from families of Brookdale residents.	0.2	
7/20/2017	CDH	Conf w KES re callers providing info re Brookdale.	0.3	
7/20/2017	CDH	Review KES memos re Brookdale callers.	0.2	
7/20/2017	KES	Multiple telephone conferences with potential witnesses regarding issues at Brookdale; confer CH re same; summarize one tc re same; review emails to/from potential witnesses/class members.	2.0	
7/21/2017	GCG	Conferences with and emails to witnesses re Brookdale treatment.	0.4	
7/21/2017	GCG	Team meeting to discuss class member and staff interviews and tracking of same.	0.4	
7/21/2017	GCG	Review CDH research re employee interviews.	0.1	
7/21/2017	GCG	Emails with SC and GN re meeting and client document retention.	0.1	
7/21/2017	BBK	RBGG team meeting.	0.5	
7/21/2017	BBK	Confs w/ CH re: F/U w/ family member of Brookdale resident.	0.1	
7/21/2017	BBK	Review CH report re: EMA's analysis re: when it is appropriate to Comm'ns w/ employee of represented party in class action context.	0.1	
7/21/2017	BBK	Review KES memos re: recent calls w/ family of prospective class members.	0.2	
7/21/2017	CDH	Research ex parte contact w/ former employees and draft memo re same.	0.8	
7/21/2017	CDH	Update to do list.	0.4	
7/21/2017	CDH	Team mtg w GCG, BBK, KES.	0.6	
7/21/2017	CDH	Supplemental conflicts check.	0.1	
7/21/2017	CDH	Circulate to do list, tracking document to GCG, BBK, KES.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/21/2017	CDH	Create spreadsheet tracking calls from potential class members.	1.7	
7/21/2017	KES	Draft and circulate detailed memos re calls with two potential witnesses re issues at Fountaingrove.	1.0	
7/21/2017	KES	Calendar meetings.	0.1	
7/21/2017	KES	Meet with GCG, BBK and CH to discuss case strategy, calls and documents; confer CH re same.	0.9	
7/24/2017	GCG	Conf w/ and email Ombudsman re class member outreach.	0.4	
7/24/2017	GCG	Email GW and team re same and re class member call memoranda.	0.3	
7/24/2017	GCG	Draft memorandum to file re named plaintiffs.	0.2	
7/24/2017	GCG	Emails to CDH re control group research and calls w/ former employees.	0.2	
7/24/2017	BBK	Review CH memo re: call w/ family of former Brookdale Fountaingrove resident.	0.1	
7/24/2017	BBK	Review CH memo re: CA legal ethics rules re: Comm'ns w/ former employees who served in management positions.	0.1	
7/24/2017	CDH	Call w/ PI (family member of resident).	0.3	
7/24/2017	CDH	Emails w PI.	0.2	
7/24/2017	CDH	Draft memo re call from PI.	0.9	
7/24/2017	KES	Emails with team re witness calls.	0.1	
7/25/2017	GCG	Review McKnight's article; email w/ team re same.	0.1	
7/25/2017	GCG	Email to KK and team re report from class member in wheelchair.	0.1	
7/25/2017	GCG	Emails w/ JC and team re client update/Fountaingrove issues.	0.1	
7/25/2017	BBK	(Billing Judgment) Review McNights article re: ADA compliance at assisted living facilities in response to Brookdale complaint.	0.0	0.1
7/25/2017	BBK	Review GCG update re: HCarlson & call from BEastes; comm'ns w/ co-counsel re: PRA requests to emergency providers serving various Brookdale communities; review KKnapp memo re: interview w/ Brookdale Anaheim Hills resident.	0.2	
7/25/2017	CDH	Emails re PRA requests.	0.2	
7/25/2017	FFV	(Billing Judgment) Organize fully executed version of retainer agreement.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
7/25/2017	FFV	(Billing Judgment) Download, pdf and save to the DMS article re ADA.	0.0	0.2
7/26/2017	GCG	Review and revise memo to clients re document retention.	0.1	
7/26/2017	GCG	Emails to SC and team re same and re new named plaintiff.	0.2	
7/26/2017	GCG	Email to KES re pleading file.	0.1	
7/26/2017	GCG	Review KK memorandum re interview w/ potential plaintiff.	0.1	
7/26/2017	BBK	Comm'ns w/ MLytle re: scheduling phone interview about her father's experiences at Brookdale Fountaingrove.	0.2	
7/26/2017	CDH	Research re Judge Donato orders in similar cases.	3.1	
7/26/2017	KES	Update electronic pleadings files.	0.1	
7/26/2017	KES	Review proofs of service and calendar answer deadline.	0.1	
7/27/2017	GCG	Revise litigation hold letters.	0.2	
7/27/2017	GCG	Emails to SC, GN and team re same and re standing issues; ADA claims.	0.3	
7/27/2017	BBK	Review comm'ns w/ co-counsel re: evidence preservation letters; adding vision-impaired class member to amended complaint.	0.2	
7/27/2017	CDH	Research re Judge Donato's rulings in similar cases.	1.5	
7/27/2017	CDH	Draft memo re Judge Donato's rulings in similar cases.	3.1	
7/27/2017	CDH	Phone call from family member of Brookdale resident.	0.4	
7/27/2017	CDH	Draft memo re call from family member of Brookdale resident.	0.5	
7/27/2017	FFV	(Billing Judgment) Save doc to DMS.	0.0	0.1
7/28/2017	GCG	Review and analyze CDH and KES memoranda to file summarizing Judge Donato's decisions and recent class member calls.	0.2	
7/28/2017	GCG	Conf w/ CDH and KES re initial disclosure and related projects.	0.6	
7/28/2017	GCG	Conf w/ CC re tweets from Brookdate ED; emails to team re same.	0.5	
7/28/2017	CDH	Update and circ to do list.	0.5	
7/28/2017	CDH	Team mtg w GCG and KES.	0.5	
7/28/2017	CDH	Phone call from Windsor resident.	0.2	
7/28/2017	CDH	Draft memo re phone call from Windsor resident.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/28/2017	CDH	Emails w Carl Whitaker re southern California press coverage.	0.2	
7/28/2017	CDH	Draft memo re Judge Donato's rulings in similar cases.	2.3	
7/28/2017	CDH	Call and email attorney representing plaintiff in ind'l case against Brookdale.	0.2	
7/28/2017	KES	Team meeting re case strategy, tasks.	0.5	
7/28/2017	KES	TC relative of Brookdale Windsor resident; confer CH re same; email to team re same.	1.0	
7/28/2017	KES	TC relative of former Brookdale Rohnert Park resident and follow up email to team re same.	0.4	
7/31/2017	GCG	Review CDH memoranda re additional class member calls.	0.1	
7/31/2017	GCG	Prepare for team meeting.	0.1	
7/31/2017	BBK	Preparation for call w/ MLylte (daughter of Brookdale Fountaingrove resident).	0.2	
7/31/2017	BBK	Phone interviewl w/ MLylte (daughter of Brookdale Fountaingrove resident).	0.8	
7/31/2017	BBK	Draft memo on phone interview w/ MLylte (daughter of Brookdale Fountaingrove resident).	0.9	
7/31/2017	BBK	Review CH & KES memos re: calls w/ potential witnesses and family of prospective class members.	0.2	
7/31/2017	BBK	Review CH's updated case tasklist.	0.1	
7/31/2017	CDH	Call from family member of Brookdale resident.	0.2	
7/31/2017	CDH	Call from fiduciary representing former Brookdale resident.	0.3	
7/31/2017	CDH	Call from daughter of current Brookdale resident.	0.5	
7/31/2017	CDH	Call and email SL, daughter of Windsor resident.	0.2	
7/31/2017	CDH	Draft memo re calls from Brookdale residents and family members.	1.3	
7/31/2017	CDH	Circ memos to co-counsel w cover note.	0.3	
7/31/2017	FFV	(Billing Judgment) Replace and save retainer agreement.	0.0	0.1
8/1/2017	GCG	(Billing Judgment) Conf w/ and emails to CDH re additional interviews and prep for co-counsel meeting.	0.0	0.1
8/1/2017	GCG	Conf w/ CW, CDH and BBK re client outreach and amending the complaint.	0.1	
8/1/2017	CDH	Check docket in Runton v. Brookdale; circ MTD order to team w memo.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/1/2017	CDH	Phone calls with three potential class members.	0.5	
8/1/2017	CDH	Draft memos re calls with potential class members.	0.4	
8/2/2017	GCG	Review and analyze CDH memoranda re Judge Donato decisions and class member interviews.	0.3	
8/2/2017	GCG	Email to CDH re agenda for Friday meeting.	0.1	
8/2/2017	GCG	Conf w/ GW and SC re opposing counsel communication and request for extension; review emails re same.	0.2	
8/2/2017	GCG	Review Fountaingrove council minutes; emails w/ SG re same.	0.1	
8/2/2017	GCG	Revise and send preservation of evidence letter to JC.	0.1	
8/2/2017	GCG	Email from JC re HC.	0.1	
8/2/2017	GCG	Revise and send preservation of evidence letter to DR and KC.	0.1	
8/2/2017	BBK	Review CH proposed agenda for 8/4 meeting w/ co-counsel.	0.1	
8/2/2017	BBK	Review email exchange between co-counsel & Brookdale's counsel re: extension to file MTD.	0.1	
8/2/2017	CDH	Draft proposed mtg agenda.	0.9	
8/2/2017	CDH	Draft email to former Brookdale employee.	0.2	
8/2/2017	FFV	(Billing Judgment) Mail ltr to JC, DR and KC re Eidler v. Brookdale.	0.0	0.2
8/2/2017	FFV	(Billing Judgment) PDF and save to the DMS Family council minutes of July 15, 2017.	0.0	0.1
8/3/2017	GCG	Prepare for meeting w/ co-counsel.	0.1	
8/3/2017	GCG	Review co-counsel letters to clients.	0.1	
8/3/2017	GCG	Emails to co-counsel re outreach.	0.1	
8/3/2017	GCG	Conf w/ Kaiser health; class member outreach.	0.1	
8/3/2017	BBK	Comm'ns w/ MT and GCG re: call from press.	0.1	
8/3/2017	CDH	Phone interview with potential CM.	0.7	
8/3/2017	CDH	Review GCG's edits to proposed mtg agenda and circ to co-counsel.	0.2	
8/4/2017	GCG	Prepare for meeting at co-counsel office.	0.3	
8/4/2017	GCG	Meet w/ co-counsel; plan initial disclosures and motion for class certification.	2.0	
8/4/2017	GCG	Confs w/ SG re call w/ BO.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/4/2017	GCG	Emails to BO.	0.2	
8/4/2017	GCG	Review and revise GW preservation letter.	0.3	
8/4/2017	GCG	(Reduced Charge) Travel to meeting at co-counsel office.	0.5	0.5
8/4/2017	CDH	Mtg w co-counsel.	2.0	
8/4/2017	CDH	Conf w KM re CCL report project.	0.4	
8/4/2017	CDH	(Reduced Charge) Travel time to mtg w co-counsel.	0.5	0.5
8/4/2017	FFV	(Billing Judgment) Print and save doc to the DMS.	0.0	0.3
8/7/2017	GCG	Conf w/ SG and BO re Fountaingrove.	0.5	
8/7/2017	GCG	Review defendants' court filings; stip and order re extension.	0.1	
8/7/2017	KES	Download and circulate filed pleadings.	0.2	
8/8/2017	GCG	Research re Brookdale sale; email co-counsel re same.	0.1	
8/8/2017	GCG	Email w/ GW re meeting w/ opposing counsel.	0.1	
8/8/2017	GCG	Conf and email w/ CDH re witness interviews.	0.1	
8/8/2017	GCG	Review court filings; email co-counsel re client outreach, Kaiser Heath news.	0.1	
8/8/2017	CDH	Phone call with potential class member.	0.4	
8/8/2017	FFV	(Billing Judgment) Download article re Brookdale and save to the DMS.	0.0	0.2
8/9/2017	CDH	Review 9th Cir opn re ADA standing and class cert.	0.3	
8/10/2017	BBK	Review supporting documentation sent by daughter of Fountaingrove resident; F/U w/ her and w/ KES re: saving docs.	0.5	
8/10/2017	BBK	Review GWallace ltr to Brookdale re: litigation hold/preservation of ESI.	0.2	
8/10/2017	BBK	Conference w/ CH re: obtaining declarations from prospective class members and coding/tracking documents in Concordance/CaseMap.	0.3	
8/10/2017	CDH	Conf w BBK re additional interviews w potential CMs, collecting decls.	0.3	
8/10/2017	KES	Update electronic document files and upload same to CaseMap.	0.4	
8/11/2017	GCG	Outreach to potential declarants; emails w/ SC and KK re same.	0.5	
8/11/2017	GCG	Review communication from potential client.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 41

SERVICES

Date	Person	Description of Services	Hours	Discount
8/11/2017	GCG	Conf w/ BBK, CDH and KES re initial disclosures and class member declarations.	0.4	
8/11/2017	GCG	Email from opposing counsel.	0.1	
8/11/2017	BBK	Review comm'ns from daughter of former Brookdale Redwood Citiy resident and Yelp review re: understaffing issues.	0.2	
8/11/2017	BBK	Weekly meeting w/ GCG/CH/KES.	0.4	
8/11/2017	BBK	Update tracking chart for contacts w/ prospective class members & witnesses; confirm access to Sharefile cite w/ co-counsel; review KKnapp report re: interview w/ prospective class member.	0.2	
8/11/2017	BBK	Review updated tasklist distributed by CH.	0.1	
8/11/2017	CDH	Team mtg w GCG, BBK, KES.	0.3	
8/11/2017	CDH	Set up ShareFile.	0.4	
8/11/2017	CDH	Update and circ to do list.	0.6	
8/11/2017	CDH	Call w potential class member; draft memo re same.	0.5	
8/11/2017	KES	Team meeting regarding case status and tasks; set up Sharefile for co-counsel.	1.4	
8/11/2017	KES	Review email re press.	0.1	
8/11/2017	KES	Update contacts.	0.1	
8/13/2017	GCG	Email to potential witness.	0.1	
8/14/2017	GCG	Emails to KK and CDH re class member outreach.	0.1	
8/14/2017	BBK	Review KES report re: call w/ daughter of resident of Brookdale Paulin Creek; review CH report re: call w/ resident of Brookdale Chanate & flyer; comm'ns w/ co-counsel re: chart of contacts w/ prospective class members & witnesses.	0.2	
8/14/2017	CDH	Update tracking chart.	1.2	
8/14/2017	CDH	Conf w KES re call from potential class member.	0.3	
8/14/2017	CDH	Emails w co-counsel re calls from potential class members.	0.3	
8/14/2017	CDH	Emails w/ co-counsel re shared CM tracking chart.	0.3	
8/14/2017	KES	TC relative of Brookdale resident; confer CH re same and email summary of call to team.	0.8	
8/14/2017	KES	Troubleshoot Sharefile tracking chart issues; confer ICS and CH re same.	1.0	
8/14/2017	KES	Review emails re case issues.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/15/2017	CDH	Phone interview with potential witness.	0.2	
8/15/2017	CDH	(Billing Judgment) Conf w ICS re sharing tracking chart.	0.0	0.2
8/15/2017	CDH	Emails w co-counsel re sharing tracking chart.	0.4	
8/15/2017	CDH	Research re initial disclosure requirements.	0.8	
8/15/2017	CDH	Review sample class cert decls.	0.4	
8/15/2017	CDH	Emails to potential witnesses.	0.2	
8/15/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
8/16/2017	GCG	Emails to GW and AKS re meeting.	0.1	
8/16/2017	GCG	Review SC email to AKS re ED refusal to interact w/ plaintiff.	0.1	
8/16/2017	GCG	Emails to SC and team re class member contract issues.	0.1	
8/16/2017	CDH	Phone interview with potential witness.	0.4	
8/17/2017	GCG	Meet w/ BBK, CDH and KES re class member outreach and initial disclosures.	0.5	
8/17/2017	GCG	Conf w/ SG re family council meeting.	0.1	
8/17/2017	GCG	Emails to GW and SC re amended complaint.	0.2	
8/17/2017	GCG	Letter from SC to AKS re communications w/ facility.	0.1	
8/17/2017	BBK	Review SColby draft ltr to Defs re: Brookdale San Ramon's refusal to answer questions from Family Council due to pending lawsuit; proposed language to add to Eidler's new contract w/ Brookdale.	0.1	
8/17/2017	BBK	RBGG team meeting w/ GCG/CH/KES.	0.3	
8/17/2017	CDH	Team mtg w GCG, BBK, KES.	0.5	
8/17/2017	FFV	(Billing Judgment) Rename and save to the DMS; print same for hard file.	0.0	0.2
8/17/2017	KES	Team meeting to discuss case status and upcoming disclosures.	0.5	
8/18/2017	BBK	Review SColby update re; status of FAC and stipulation to extend time to file.	0.1	
8/18/2017	KES	Download and circulate pleading.	0.1	
8/19/2017	GCG	Review and comment on draft SAC; email SC and team re same.	0.5	
8/19/2017	GCG	Review client and family council reports of continued problems; email to team.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/20/2017	GCG	Review communications from potential declarants; email team re same.	0.1	
8/20/2017	GCG	Emails to JC, DR and KC re status and document preservation.	0.1	
8/20/2017	GCG	Email to CDH re initial disclosures.	0.1	
8/21/2017	GCG	Conf w/ BBK re revisions to FAC.	0.1	
8/21/2017	GCG	Conf w/ JC re issues at Fountaingrove and preserving emails.	0.2	
8/21/2017	GCG	Review class member reports; emails w/ team re same.	0.2	
8/21/2017	BBK	Review Daily Journal article re: 9th Cir opinion denying class certification in ADA claim against real estate company due to individualized policies; review kES report re: call from son of Fountaingrove resident.	0.1	
8/21/2017	BBK	Review draft First Amended Complaint and send proposed revisions to GCG and co-counsel.	1.1	
8/21/2017	KES	(Billing Judgment) Research.	0.0	0.1
8/21/2017	KES	TC relative of Brookdale resident re problems at Fountaingrove and email to team re same.	0.8	
8/22/2017	GCG	Conf w/ DR re document preservation and status.	0.2	
8/22/2017	GCG	Draft memo to file re same.	0.2	
8/22/2017	GCG	Work on initial disclosures.	0.1	
8/22/2017	BBK	Review GCG report re: call w/ DRostrel re: evidence preservation; update from co-counsel re: PRA Response from San Ramon Fire Dep't.	0.1	
8/23/2017	GCG	Emails w/ CDH and team re initial disclosures and memo to file re client call.	0.1	
8/23/2017	JSY	Emails re Initial disclosures.	0.1	
8/24/2017	GCG	Email to SC and team re 1st amended complaint and class member outreach.	0.2	
8/24/2017	GCG	Email to KES re fact research.	0.1	
8/24/2017	BBK	Review GWallace report re: adding potential additional class representation from Brookdale facility in San Luis Obispo.	0.1	
8/24/2017	BBK	Review updated draft FAC including new prospective class member; send revision to SColby.	0.3	
8/24/2017	CDH	Call potential witness.	0.1	
8/24/2017	CDH	Review and edit draft of FAC.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/24/2017	KES	Lengthy tc with relative of Brookdale resident; confer CH re same.	1.0	
8/25/2017	BBK	Comm'ns w/ co-counsel re: amending complaint to add new class representatioves.	0.1	
8/25/2017	BBK	Review KES memo re: call from daughter of Brookdale Paulin Creek resident.	0.1	
8/25/2017	KES	Download and circulate pleadings.	0.2	
8/25/2017	KES	Memo to team re conversation with potential witness.	1.4	
8/29/2017	KES	Review news articles and update fact research folder.	0.2	
8/30/2017	BBK	Review Brookdale Fountaingrove Family Council minutes for August 2017 meeting.	0.1	
8/30/2017	CDH	Phone conf w potential class member.	0.2	
8/31/2017	BBK	Comm'ns w/ CH/co-counsel re: report from Brookdale Santa Rosa and KES update re: call from relative of Brookdale resident re: letter.	0.2	
8/31/2017	CDH	Conf w potential class member.	0.2	
8/31/2017	CDH	Fwd KES memo to team re call from potential class member.	0.1	
8/31/2017	KES	TC relative of Brookdale resident; confer CH re same and email team re same.	0.5	
9/1/2017	GCG	Email from former employee regarding Brookdale practices; share w/ team.	0.1	
9/5/2017	BBK	Review Brookdale resident survey.	0.1	
9/5/2017	CDH	Call and leave vm msg for potential witness.	0.1	
9/6/2017	GCG	Conf w/ CDH regarding class member declarations.	0.1	
9/6/2017	GCG	Email from SC regarding survey.	0.1	
9/7/2017	GCG	Review filing deadlines and email from SC regarding "Survey".	0.2	
9/7/2017	BBK	Review California Healthline article regarding Eidler lawsuit.	0.1	
9/7/2017	CDH	Phone conf w potential class member.	0.2	
9/8/2017	GCG	Conf w/ SC regarding non-compliant door and surveys.	0.2	
9/11/2017	GCG	Emails w/ clients regarding survey.	0.2	
9/11/2017	BBK	Phone call w/ conservator of prospective class member at Brookdale Tracy.	0.3	
9/11/2017	BBK	Draft/send memo regarding prospective class member at Brookdale Tracy.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/12/2017	GCG	Conf w/ SG regarding status; email FAC to SG.	0.2	
9/12/2017	GCG	Prepare memo to file regarding JC report on HC issues; email w/ team regarding same.	0.2	
9/12/2017	GCG	Email to clients regarding FAC and status.	0.1	
9/13/2017	GCG	Email to CW regarding nursing home deaths.	0.1	
9/13/2017	GCG	Email to BO regarding FAC.	0.1	
9/13/2017	GCG	Review email JC and Ombudsman regarding HC.	0.1	
9/13/2017	GCG	Email to KES and team regarding initial disclosures.	0.1	
9/14/2017	GCG	Review BBK memo regarding blind class member; email SC and team regarding same.	0.4	
9/14/2017	GCG	Meet w/ BBK, CDH and KES to discuss class member declarations and intial disclosures.	0.6	
9/14/2017	BBK	RBGG team meeting w/ GCG/CH/KES.	0.5	
9/14/2017	BBK	Comm'ns w/ co-counsel regarding obtaining additional declarations and potential new named Ps; scheduling conference call.	0.1	
9/14/2017	BBK	Comm'ns w/ RBGG team regarding press outreach.	0.1	
9/14/2017	CDH	Call potential witness.	0.1	
9/14/2017	CDH	Research effect of GO56 on Rule 26 deadlines.	0.2	
9/14/2017	CDH	Update to do list.	0.5	
9/14/2017	CDH	Team mtg w GCG, BBK, KES.	0.6	
9/14/2017	KES	Download class member and other documents from Sharefile and brief review of same; review and upload new client document to CaseMap.	1.2	
9/14/2017	KES	Prepare for and attend team meeting regarding case status, tasks.	0.5	
9/15/2017	GCG	Emails to CW and conf w/ GB regarding Riverside County outreach.	0.2	
9/18/2017	GCG	Review complaints from class members; emails w/ same.	0.5	
9/18/2017	GCG	Emails w/ SC and team regarding class cert declarations and employee interviews.	0.5	
9/18/2017	GCG	Conf and email to KES regarding legal and factual research.	0.1	
9/18/2017	BBK	(Billing Judgment) Review Press Democrat and Riverside Press-Enterprise articles on Eidler.	0.0	0.1
9/18/2017	CDH	Draft list of items to include in class member decls.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/18/2017	CDH	Draft class member decl.	3.7	
9/18/2017	CDH	Draft Lytle decl.	1.2	
9/18/2017	CDH	Emails regarding plaintiff tracking chart.	0.1	
9/18/2017	KES	Online research regarding complaint against senior living company; set up court account for same.	0.5	
9/19/2017	GCG	Client and witness outreach; emails to co-counsel regarding same.	0.4	
9/19/2017	BBK	Comm'ns w/ team/co-counsel regarding interviewing potential witnesses and class members; comm'ns w/ CH regarding updating tracking chart of contacts.	0.1	
9/19/2017	CDH	Draft Lytle decl.	0.9	
9/19/2017	CDH	Supplemental conflicts check.	0.2	
9/19/2017	CDH	Update plaintiff tracking chart.	0.4	
9/19/2017	FFV	(Billing Judgment) Download, named, save to the DMS emailed article.	0.0	0.2
9/19/2017	KES	Review documents provided by Michelle Lytle and follow up phone call to get contract.	0.3	
9/19/2017	KES	Review status of witness communications and update tracking chart.	0.4	
9/19/2017	KES	Update CaseMap with recent minutes.	0.2	
9/19/2017	KES	Review transcript of phone call from potential witness.	0.1	
9/19/2017	KES	Review emails regarding communications with potential witnesses.	0.2	
9/20/2017	GCG	Review letter regarding door modification that violates ADA; email SC and team regarding same.	0.1	
9/20/2017	GCG	Email w/ former employee.	0.1	
9/20/2017	GCG	Client outreach.	0.1	
9/21/2017	GCG	Fact Research.	0.1	
9/21/2017	GCG	Email to CDH regarding team meeting.	0.1	
9/21/2017	GCG	Email to DM regarding reviewing FAC.	0.1	
9/21/2017	CDH	Revise class member decls.	1.3	
9/21/2017	CDH	Circ draft decls to team w memo.	0.2	
9/21/2017	KES	Update electronic press file.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/22/2017	GCG	Meet w/ BBK, CDH and KES regarding initial disclosures and declarations.	0.3	
9/22/2017	BBK	Review KKnapp draft declaration outline; SColby draft ltr to opposing counsel regarding deactivation of automatic door at Brookdale San Ramon.	0.2	
9/22/2017	BBK	Review CH draft declarations based on interviews/docs.	0.3	
9/22/2017	BBK	Team meeting w/ GCG/CH/KES.	0.3	
9/22/2017	KES	Team meeting regarding case status and tasks.	0.3	
9/22/2017	KES	Gather case information for new attorney.	0.2	
9/22/2017	KES	Review and circulate court order.	0.1	
9/25/2017	GCG	Interview former employee.	0.5	
9/25/2017	GCG	Email to SC and team regarding SE move-out, Family Council.	0.2	
9/25/2017	GCG	Email to KS and team regarding potential expert.	0.2	
9/25/2017	GCG	Email to CDH and team regarding potential plaintiff and tracking chart.	0.2	
9/25/2017	BBK	Review SColby report on potential consulting expert.	0.1	
9/25/2017	CDH	Call potential class member.	0.3	
9/25/2017	CDH	Call second potential class member.	0.4	
9/25/2017	CDH	Update plaintiff tracking chart.	0.4	
9/26/2017	GCG	Email to DM regarding class member declarations.	0.1	
9/26/2017	KES	Review documents received from relative of Brookdale resident.	0.2	
9/26/2017	KES	Prepare updated plaintiff and witness tracking chart.	0.2	
9/27/2017	CDH	Conf w DM regarding orientation to case.	0.6	
9/27/2017	DWM	Reviewing emails received in case and setting up case introduction meeting with fellow associate.	0.2	
9/27/2017	DWM	Reviewed Declarations and background of presiding judge.	0.5	
9/27/2017	DWM	Met with Chris Hu to discuss case, specifically, anticipated motion to dismiss, need for classmember declarations, and how to deal with potential classmember phonecalls.	0.5	
9/27/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
9/29/2017	GCG	Begin reviewing motions to strike, dismiss and compel.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/29/2017	GCG	Meet w/ BBK, CDH, DM and KES to discuss opposition and continued gathering of class cert declarations.	0.7	
9/29/2017	GCG	Emails to GW regarding motions and need for continuance.	0.2	
9/29/2017	GCG	Email SG regarding factual development.	0.2	
9/29/2017	BBK	Comm'ns w/ team regarding meeting on motions filed by Defs' w/ co-counsel.	0.1	
9/29/2017	BBK	Team meeting w/ GCG, CH, DM, and KES.	0.8	
9/29/2017	BBK	Review CH's proposed division of labor for oppositions to Brookdale's motions; DM comm'ns regarding Brookdale resident status.	0.1	
9/29/2017	CDH	Review Brookdale's filings.	0.5	
9/29/2017	CDH	Team mtg w GCG, BBK, KES, DM.	0.7	
9/29/2017	CDH	Review client residency agmts.	0.2	
9/29/2017	CDH	Outline responses to Brookdale's motions.	3.0	
9/29/2017	CDH	Draft email to team regarding proposed division of labor for opps.	0.2	
9/29/2017	DWM	Emails regarding afternoon meeting.	0.1	
9/29/2017	DWM	Short discussion regarding arbitration issues raised in Mot. to Dismiss.	0.1	
9/29/2017	DWM	Discussed case documents with KS.	0.1	
9/29/2017	DWM	Initial review of defendant's 9.28.2017 filings.	0.3	
9/29/2017	DWM	Meeting w/ GCG, BBK, and CH to discuss recently filed motions from defendants.	0.7	
9/29/2017	DWM	Research regarding FAA carve-outs; continuing to analyze mot. to compell arbitration and attachements; analyze CDH memo on arbitration.	2.0	
9/29/2017	KES	Download, organize and update electronic files with multiple motions filed by defendants; calendar deadlines.	1.6	
9/29/2017	KES	Team meeting regarding case status, tasks.	0.4	
9/30/2017	GCG	Review and analyze motions to compel, strike and dismiss.	0.8	
9/30/2017	GCG	Draft memoranda to file regarding same.	0.5	
9/30/2017	GCG	Review emails from CDH and SG regarding factual issues/problems.	0.1	
9/30/2017	BBK	Review GCG/CH initial thoughts on Brookdale motions.	0.1	
9/30/2017	CDH	Emails w GCG regarding Brookdale's filings.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/1/2017	GCG	Review emails and letters from SG re resident denied care and Fountaingrove lack of cooperation w/ Family Council; forward to team.	0.3	
10/1/2017	GCG	Email to KES re tagging key documents.	0.1	
10/1/2017	GCG	Emails to KS and team re meeting to discuss opposition to motions.	0.2	
10/1/2017	GCG	Review and analyze motion to strike class allegations.	0.2	
10/1/2017	GCG	Review sample declaration ISO class certification.	0.1	
10/1/2017	CDH	Legal research for opp to MTD.	1.4	
10/1/2017	CDH	Legal research re opp to motion to compel.	1.0	
10/2/2017	GCG	Prepare for and conduct meeting with co-counsel to discuss opposition strategy.	2.0	
10/2/2017	GCG	Work on obtaining complete client files.	1.0	
10/2/2017	GCG	Review and analyze arbitration agreements from JC, KC and DR.	0.5	
10/2/2017	GCG	Conf w/ DM and CDH re same and re opposition declaration.	0.3	
10/2/2017	GCG	Research re Brookdale admissions re ADA; email team re same.	0.5	
10/2/2017	GCG	Conf w/ KES re same and re updating plaintiff tracking chart.	0.2	
10/2/2017	GCG	Conf w/ SG re Family Counsel issues and resident complaints.	0.3	
10/2/2017	BBK	Review CH/GCG comm'ns regarding proposed next steps and potential name plaintiff leads.	0.2	
10/2/2017	CDH	Mtg w co-counsel.	1.5	
10/2/2017	CDH	Outline opp to motion to compel.	0.7	
10/2/2017	CDH	Research arbitration briefing in Atria case.	0.4	
10/2/2017	CDH	Review client residency agmts, agmts for other class members.	0.4	
10/2/2017	CDH	Legal research re public accommodation issue.	0.9	
10/2/2017	CDH	Draft section of opp re public accommodation.	0.6	
10/2/2017	CDH	Draft memo to GCG and DM re schedule and named plaintiff leads.	0.7	
10/2/2017	CDH	Conf w DM re case.	0.3	
10/2/2017	CDH	Conf w GCG and DM re motion to compel.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/2/2017	DWM	Review GCG and CH's thoughts on Defendant's Motions, review additional classmember correspondence and family council interactions.	0.4	
10/2/2017	DWM	Review and analyze defendants' motions in preparation for meeting with co-counsel.	1.5	
10/2/2017	DWM	Meeting with co-counsel to discuss defendant's motions.	1.6	
10/2/2017	DWM	Debrief w/ CH to discuss how to proceed on arbitration issues.	0.4	
10/2/2017	DWM	Reviewing and updating records requests for clients.	0.7	
10/2/2017	DWM	Follow-up meeting w/ CH and GCG re upcoming briefing.	0.3	
10/2/2017	DWM	Revising Jones and Carlson records requests and correspondence.	0.6	
10/2/2017	DWM	Research re Mary-Catherine Jones POA.	0.4	
10/2/2017	DWM	Reviewing emails re additional classmembers and facts.	0.2	
10/2/2017	DWM	Continuing to update records request, review POA docs, and draft emails to clients.	0.4	
10/2/2017	DWM	Entered notice of appearance; began to organize tasks for drafting opposition to mot. to compel arbitration and talking with new potential clients; read memo on past client contact.	1.3	
10/2/2017	KES	Review and prepare documents for CaseMap; review and gather documents for attorneys.	3.7	
10/2/2017	KES	Draft notice of appearance of counsel.	0.3	
10/2/2017	KES	Update CaseMap case permissions.	0.1	
10/2/2017	KES	Consider issues for document production through CaseMap.	1.0	
10/3/2017	GCG	Conf w/ and emails to DM re potential client RS.	0.6	
10/3/2017	GCG	Revise retainer agreement.	0.2	
10/3/2017	GCG	Review and analyze memorandum re RS and RS client documents.	0.2	
10/3/2017	GCG	Emails to JC and KC re obtaining client files.	0.2	
10/3/2017	GCG	Conf w/ DM re same.	0.1	
10/3/2017	GCG	Research potential plaintiffs; emails w/ DM, KES and team re same.	0.4	
10/3/2017	BBK	Comm'ns w/ DM re: following up w/ conservator for Brookdale Tracy resident.	0.1	
10/3/2017	BBK	Conference w/ CH & DM re: call w/ conservator for Brookdale Tracy resident.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/3/2017	BBK	Review DM memo re: call w/ conservator for Brookdale Tracy resident; comm'ns w/ GCG re: in-person meeting w/ resident/conservator.	0.2	
10/3/2017	BBK	Review Brookdale motion to dismiss, motion to strike, and motion to compel arbitration.	0.6	
10/3/2017	CDH	Calls to potential class members.	0.2	
10/3/2017	CDH	Conf w DM re opp to motion to compel.	0.3	
10/3/2017	CDH	Research and draft section of opp re public accommodation.	2.8	
10/3/2017	DWM	(Billing Judgment) Preparing questions for CDH.	0.0	0.1
10/3/2017	DWM	Short meeting with CDH to discuss calls to potential class clients and what is needed for declarations.	0.2	
10/3/2017	DWM	Analyzing arbitration caselaw.	0.4	
10/3/2017	DWM	Looking into add'l named plaintiffs.	0.2	
10/3/2017	DWM	Planning what is needed from add'l declarants.	0.2	
10/3/2017	DWM	Meeting w/ GCG to discuss potential client calls + follow up.	0.4	
10/3/2017	DWM	Analyzing arbitration case law.	1.1	
10/3/2017	DWM	Meet with KS re key document locations, search methods, and spreedsheet maintenance.	0.3	
10/3/2017	DWM	Call with Heather Fischer + memorandum memorializing call.	0.2	
10/3/2017	DWM	Call with potential plaintiff, memo to file re call, follow-up email to potential plaintiff, call to KS to let her know of call to potential plaintiff.	0.3	
10/3/2017	DWM	(Billing Judgment) Filing correspondence.	0.0	0.1
10/3/2017	DWM	Call with classmember.	0.5	
10/3/2017	DWM	Quick meeting w/ GCG to discuss classmember call.	0.1	
10/3/2017	DWM	Email follow-up w/ classmember.	0.1	
10/3/2017	DWM	Analyze arbitration clause in residency agreement.	0.1	
10/3/2017	DWM	Preparing and circulating detailed memo on impressions from classmember call and residency agreement.	0.8	
10/3/2017	DWM	Preparing for client potentional client meeting.	1.0	
10/3/2017	DWM	Meeting w/ GCG to discuss process for meeting w/ potential client and how to conduct site visit.	0.5	
10/3/2017	DWM	Preparation of records request.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/3/2017	DWM	Preparation and circulation of information on new potential client to co-counsel.	0.5	
10/3/2017	FFV	(Billing Judgment) Create binder re Motions to Dismiss/compel.	0.0	0.3
10/3/2017	KES	Review and organize client documents for electronic files and CaseMap upload.	3.0	
10/4/2017	GCG	Conf w/ and emails to DM re witness and plaintiff interviews.	0.1	
10/4/2017	GCG	Email from GW re oppositions.	0.1	
10/4/2017	GCG	Emails to CDH and team re potential plaintiffs.	0.2	
10/4/2017	GCG	Conf w/ TM re arbitration agreement.	0.2	
10/4/2017	GCG	Email to JC re file request.	0.1	
10/4/2017	BBK	Comm'ns w/ DM re: receipt of documents from MLytle re: her father EBoris.	0.1	
10/4/2017	BBK	Review DM memo re: F/U w/ MLytle re: her father EBoris, Fountaingrove resident.	0.1	
10/4/2017	CDH	Legal research re release of claims.	0.6	
10/4/2017	DWM	(Billing Judgment) Review Eidler Compl. to prepare for client meeting.	0.0	0.4
10/4/2017	DWM	Continuing to prepare questions and study background for client meeting.	0.3	
10/4/2017	DWM	Emailing and then phone conversation w classmember.	0.4	
10/4/2017	DWM	Researching key case records + discussing recordkeeping system w KES.	0.2	
10/4/2017	DWM	Analyze and save classmember docs.	0.2	
10/4/2017	DWM	Meeting in Tracy, CA with classmember and conservator, site visit.	2.0	
10/4/2017	DWM	(Billing Judgment) Review GCG emails.	0.0	0.1
10/4/2017	DWM	Prepare memo re classmember call and prepare email circulating internally and separate email circulating to co-counsel.	1.1	
10/4/2017	DWM	(Reduced Charge) Travel to and from meeting in Tracy, CA with class member and conservator, site visit.	1.5	1.5
10/4/2017	KES	Update and organize client documents in CaseMap; review status of documents and email to team re document management issues.	0.6	
10/5/2017	GCG	Review DM notes from potential client interview.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/5/2017	GCG	Email w/ potential client's attorney re court approval.	0.2	
10/5/2017	GCG	Conf w/ DM re potential client, arbitration clauses and briefing.	0.3	
10/5/2017	GCG	Revise proposed stipulation re extending time.	0.2	
10/5/2017	GCG	Emails w/ GW and KK re same.	0.1	
10/5/2017	BBK	Review DM memo re: meeting w/ prospective plaintiff RSchmidt and his conservator HFisher at Brookdale Tracy.	0.2	
10/5/2017	BBK	Conference w/ DM re: arbitration agreement opt-outs in Brookdale's 2015 contracts.	0.1	
10/5/2017	CDH	Legal research re arbitration issues.	0.3	
10/5/2017	DWM	Composing and circulating memo of meeting with classmember and conservator.	2.6	
10/5/2017	DWM	Reviewing declaration templates.	0.1	
10/5/2017	DWM	(Billing Judgment) Requesting add'l records request prep and finding relevant dos.	0.0	0.1
10/5/2017	DWM	Prepping for classmember calls; running through emails to research last contact w/ individuals, preping to write memos.	0.4	
10/5/2017	DWM	Preping docs request and email; discussing classmember meetings with GCG; quick touch-base w/ KS; prep and send of email to classmember.	1.2	
10/5/2017	DWM	Email to classmember; and brief chat w KES re searches; email to GCG; emails to cocounsel.	0.7	
10/5/2017	DWM	Call w/ classmember; quick base touch w/ GCG; email to classmember and lawyer.	0.8	
10/5/2017	DWM	Brief discussion w BBK re abritration agreements in 2015 Brookdale contract.	0.1	
10/5/2017	DWM	Review email from classmember lawyer.	0.1	
10/5/2017	KES	Follow up re CaseMap issues.	0.2	
10/6/2017	GCG	Emails to SC and team re potential plaintiff's with no arbitration caluse.	0.1	
10/6/2017	BBK	Conference w/ DM re: opposing motion to compel arbitration.	0.1	
10/6/2017	CDH	Legal research re arbitration issues.	0.5	
10/6/2017	DWM	Working on brief.	0.6	
10/6/2017	DWM	Research and drafting opposition to mot. to compel arbitration.	1.6	
10/6/2017	DWM	(Billing Judgment) Drafting and reviewing eamils.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
10/6/2017	DWM	Research and drafting opposition to mot. to compel.	0.5	
10/6/2017	DWM	Discuss arbitration situation with BBK.	0.2	
10/6/2017	DWM	Reviewing and updating new (proposed) schedule for motion responses.	0.1	
10/6/2017	DWM	Communicating w classmember.	0.4	
10/6/2017	DWM	Attend to preserving photos from Tracy visit.	0.6	
10/8/2017	GCG	Review Consumer Reports issues on assisted living concerns; follow up.	0.3	
10/9/2017	GCG	Emails to JC and team re Fountaingrove evacuation.	0.3	
10/9/2017	GCG	Conf w/ and emails to DM re arbitration agreements, opposition brief and new class representatives.	0.7	
10/9/2017	GCG	Email to DM re LQ agreement.	0.1	
10/9/2017	GCG	Conf w/ SC re opposition briefing and arbitration agreements.	0.3	
10/9/2017	GCG	Email client conservator.	0.1	
10/9/2017	GCG	Email w/ GW re conservator issues and arbitration agreement.	0.2	
10/9/2017	BBK	Review report re: evacuation of Brookdale Fountaingrove due to fire.	0.1	
10/9/2017	BBK	Review DWM memo re: call w/ daughter of prospective named plaintiff at Brookdale Vallejo Hills.	0.1	
10/9/2017	DWM	Writing and circulating memo re classmember.	0.5	
10/9/2017	DWM	Corresponding with WP re Tracy.	0.1	
10/9/2017	DWM	Reviewing outstanding tasks and last communications in Eidler.	0.1	
10/9/2017	DWM	Conference w GCG re fire and meeting later.	0.1	
10/9/2017	DWM	Emails re fire; call w client; circulation of notes.	0.3	
10/9/2017	DWM	Updating client list.	0.1	
10/9/2017	DWM	Meeting with GCG on moving forward re motion and adding clients + declarations.	0.6	
10/9/2017	DWM	Legal research re arbitration and successors in interest.	0.5	
10/9/2017	DWM	Review emails re fire and evacuation.	0.1	
10/9/2017	DWM	Email w potential client.	0.1	
10/9/2017	DWM	Meeting w KES re ongoing doc and client tasks.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/9/2017	DWM	Emailing potential plaintiff to set up meeting.	0.2	
10/9/2017	DWM	Email KES re people search.	0.1	
10/9/2017	DWM	Talking through casemap issues with KSM.	0.1	
10/9/2017	DWM	(Billing Judgment) CaseMap Tech Support.	0.0	0.1
10/9/2017	DWM	Call to BBK re plaintiff.	0.1	
10/9/2017	DWM	Reviewing email then writing client re meeting.	0.2	
10/9/2017	DWM	Trading emails with GCG.	0.2	
10/9/2017	DWM	Review GCG emails.	0.1	
10/9/2017	DWM	Looking at arbitration clauses in all residency agreements in CaseMap docs.	2.7	
10/9/2017	DWM	Reviewing emails from GCG and co-counsel.	0.2	
10/9/2017	DWM	Call w/ client re fire and email details to colleagues.	0.1	
10/9/2017	DWM	Working w KES on CaseMap.	0.2	
10/9/2017	KES	Westlaw research re parties.	1.5	
10/9/2017	KES	(Billing Judgment) Scan and email article to team.	0.0	0.3
10/9/2017	KES	Review emails with client.	0.1	
10/9/2017	KES	Confer DM re client documents.	0.2	
10/10/2017	GCG	Emails w/ co-counsel re stipulation to extend time and communication with clerk re same.	0.2	
10/10/2017	GCG	Research and draft ex parte application for additional time based on Fountaingrove fire and evacuation.	0.5	
10/10/2017	GCG	Email to JC re evacuation status.	0.1	
10/10/2017	GCG	Confs w/ DM and CDH re arbitration opposition.	0.3	
10/10/2017	GCG	Conf w/ DM re retention of new plaintiff.	0.2	
10/10/2017	GCG	Review SC research re successor in interest issues.	0.1	
10/10/2017	CDH	Conf w DM re opp to motion to compel.	0.7	
10/10/2017	CDH	Conf w MLF re arbitration issues.	0.7	
10/10/2017	DWM	Discussing strategy w/ CET.	0.1	
10/10/2017	DWM	Meeting with CDH to discuss current status of opposition and legal research re same.	1.0	
10/10/2017	DWM	Reviewed emails re classmember POA.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/10/2017	DWM	Review email re stipulation.	0.1	
10/10/2017	DWM	Draft excel sheet table re mot. to dismiss arguments.	0.9	
10/10/2017	DWM	Review and respond to co-counsel email.	0.1	
10/10/2017	DWM	Review internal email.	0.1	
10/10/2017	DWM	Add'l emails re successors in interest, filing cases, brief look at contents, review and file classmember POA.	0.4	
10/10/2017	DWM	Meeting w CDH and MLF re arbitration.	0.7	
10/10/2017	DWM	Email with KES reviewing Residency agreements and POAs; continuing with chart.	1.3	
10/10/2017	DWM	Meeting w GCG to discuss case updates.	0.3	
10/10/2017	DWM	Touchbase w KES re client documents.	0.1	
10/10/2017	DWM	Westlaw results review; conflicts check.	0.3	
10/10/2017	DWM	Add'l work retaining class representatives.	1.1	
10/10/2017	DWM	Working on outline re opposition.	0.1	
10/10/2017	DWM	Reviewed emails from GCG.	0.1	
10/10/2017	MLF	(Billing Judgment) Conf. w/CH, Devin, re: opposition to motion to compel arbirtation.	0.0	1.0
10/10/2017	KES	Follow up Westlaw research.	0.3	
10/10/2017	KES	Review memos re potential new declarants and update tracking chart with new contacts.	1.2	
10/10/2017	KES	Review Sharefile for new documents; update Sharefile permissions.	0.2	
10/10/2017	KES	Review emails with clients.	0.1	
10/11/2017	GCG	Research and draft ex parte application for additional time to file opposition briefs.	1.0	
10/11/2017	GCG	Confs w/ DM, SC and emails to GW re same and re opposition briefs.	0.9	
10/11/2017	GCG	Emails w/ clients re evacuation status and files.	0.3	
10/11/2017	GCG	Draft, revise and send letter to AKS re need to review files.	0.2	
10/11/2017	CDH	Conf w Kelly re release issue.	0.3	
10/11/2017	CDH	Legal research re release issue.	1.0	
10/11/2017	CDH	Legal research re piecemeal dismissal.	1.6	
10/11/2017	CDH	Draft section of opp to MTD re piecemeal dismissal.	2.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/11/2017	DWM	Review Mot. to Compel.	0.2	
10/11/2017	DWM	Reviewing client documents.	0.4	
10/11/2017	DWM	Short meeting w GCG re status.	0.3	
10/11/2017	DWM	Legal research re successors in interest.	0.5	
10/11/2017	DWM	Local rules research for filing.	0.4	
10/11/2017	DWM	Reviewing ex parte filings.	0.7	
10/11/2017	DWM	Touchbase w GCG re ex parte motion.	0.1	
10/11/2017	DWM	Setting new appointment time w potential client.	0.1	
10/11/2017	DWM	Reviewing records requests for ex parte motion.	0.2	
10/11/2017	DWM	Review co-counsel emails.	0.3	
10/11/2017	DWM	Review GCG and co-counsel emails.	0.1	
10/11/2017	DWM	Prep for client meeting.	0.2	
10/11/2017	DWM	Quick calls w potential client re POA and meeting.	0.7	
10/11/2017	DWM	Prep for retainer agreement.	0.7	
10/11/2017	DWM	Legal research re filing ex parte.	0.6	
10/11/2017	DWM	Editing filings.	0.6	
10/11/2017	DWM	Opposition drafting.	0.6	
10/11/2017	DWM	Continue to work on ex parte mot.	1.0	
10/11/2017	DWM	Meet w KES to figure out doc control.	0.3	
10/11/2017	DWM	Circulate motion docs to GCG.	0.3	
10/11/2017	FFV	(Billing Judgment) Mail ltr to KohSweeney re obtaining files.	0.0	0.1
10/11/2017	KES	Prepare exhibits for letter.	0.3	
10/11/2017	KES	Download and circulate pleadings.	0.1	
10/12/2017	GCG	Emails to court clerk re stipulation and proposed order.	0.3	
10/12/2017	GCG	Emails to GW, SC and team re revisions to draft oppositions to motions to dismiss.	0.5	
10/12/2017	GCG	Revise ex parte application and declaration ISO additional time to oppose motion to compel arbitration.	1.0	
10/12/2017	GCG	Conf w/ DM and CDH re factual issues in motion to compel and new plaintiffs.	0.3	
10/12/2017	GCG	Review letter from AKS re files.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/12/2017	GCG	Correspond w/ clients re fire/evacuation.	0.1	
10/12/2017	CDH	Draft section of opp to MTD re piecemeal dismissal, send to co-counsel.	1.0	
10/12/2017	CDH	Revise section of opp to MTD re piecemeal dismissal to incorporate co-counsel's material.	0.8	
10/12/2017	CDH	Conf w GCG and DM re opps to motions, stipulated extension.	0.4	
10/12/2017	CDH	Review and edit public accommodation section of opp to MTD.	0.5	
10/12/2017	DWM	Email to GCG re status of ex parte application.	0.1	
10/12/2017	DWM	Meeting w CDH re Eidler.	0.1	
10/12/2017	DWM	Reviewing and writing emails re deadlines and setting upcoming client meeting.	0.1	
10/12/2017	DWM	Meeting w GCG and CDH re timeline.	0.3	
10/12/2017	DWM	Drafting opp. to mot. to compel.	0.4	
10/12/2017	DWM	Review and file plaintiff update on evacuation.	0.1	
10/12/2017	DWM	Drafting, research, and preparing attachments.	1.9	
10/12/2017	DWM	Drafing opp. to mot. to compel.	0.4	
10/12/2017	DWM	Ex parte application revisions.	0.9	
10/12/2017	DWM	(Billing Judgment) Reviewing ex parte application.	0.0	1.0
10/12/2017	DWM	Email to KES for filing.	0.1	
10/12/2017	FFV	(Billing Judgment) Print and save to the DMS ltr from KohSweeney.	0.0	0.1
10/12/2017	KES	Calendar new deadlines.	0.3	
10/12/2017	KES	Team meeting regarding case status, documents.	0.4	
10/12/2017	KES	Review emails re case issues.	0.2	
10/12/2017	KES	Update electronic research file.	0.1	
10/12/2017	KES	Prepare exhibit.	0.1	
10/13/2017	GCG	Correspond w/ witnesses re arbitration clauses and evacuation.	0.2	
10/13/2017	GCG	Emails to DM re same.	0.1	
10/13/2017	GCG	Email to SC re stipulation and proposed order.	0.1	
10/13/2017	CDH	Legl research re release issue.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/13/2017	DWM	Confirm appointment w potential client.	0.1	
10/13/2017	DWM	Prepare for client meeting; review key disclosures.	0.7	
10/13/2017	DWM	Review intake form; phonecall w classmember; write up email and circulate re call.	0.5	
10/13/2017	DWM	(Reduced Charge) Travel to and from Vallejo for meeting with potential client.	1.0	1.0
10/13/2017	DWM	Meeting and interview with client.	3.0	
10/13/2017	FFV	(Billing Judgment) Save docs to the DMS.	0.0	0.1
10/13/2017	KES	Organize new client documents and upload to CaseMap.	1.1	
10/14/2017	GCG	Email w/ KES re client files from AKS.	0.1	
10/16/2017	GCG	Emails to CW, GW and KS re Brookdale position that ADA does not apply; review motion.	0.2	
10/16/2017	GCG	Conf w/ CW re same.	0.2	
10/16/2017	GCG	Confs w/ and emails to DM and KES re client file and outreach.	0.2	
10/16/2017	GCG	Email w/ AKS re power of attorney and Fountaingrove evacuation.	0.2	
10/16/2017	DWM	Update GCG re Friday potential client meeting.	0.1	
10/16/2017	DWM	Locating and circulating client POA.	0.1	
10/16/2017	DWM	Reviewing and filing emails re client POAs and documents sent to opposing counsel.	0.1	
10/16/2017	DWM	Touch base w KES re new docs.	0.1	
10/16/2017	DWM	Quick run through of newly produced docs and email to case team with findings and path forward.	0.4	
10/16/2017	DWM	Returning call of potential classmember.	0.1	
10/16/2017	DWM	Email to inform team of results of call w potential classmember.	0.1	
10/16/2017	DWM	Review addition of pictures to client-meeting memo.	0.1	
10/16/2017	DWM	Review and respond to document production related emails.	0.1	
10/16/2017	DWM	Touchbase w KES re missing pages of POA.	0.1	
10/16/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
10/16/2017	KES	Review files for missing POA page; scan and save complete document for files.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/16/2017	KES	Download client files provided by opposing counsel and brief review and OCR of same.	0.7	
10/17/2017	GCG	Review intake communications.	0.1	
10/17/2017	GCG	Conf w/ DM and email w/ SC re client PoA.	0.1	
10/17/2017	GCG	Voicemail and email to attorney for potential plaintiff.	0.1	
10/17/2017	CDH	Draft memo to co-counsel re legal research on release of claims.	1.0	
10/17/2017	CDH	Emails w co-counsel re PRA requests.	0.1	
10/17/2017	DWM	Review article re Brookdale management.	0.1	
10/17/2017	DWM	Review incoming emails from and to co-counsel re mot to dismiss.	0.2	
10/17/2017	DWM	Preparing declarations for potential plaintiffs.	0.6	
10/17/2017	DWM	Drafting, editing, reviewing, and circulating declarations for add'l plaintiff.	0.8	
10/17/2017	DWM	Quick call w GCG re POAs in our possession.	0.2	
10/17/2017	DWM	Review GCG email to co-counsel re POAs and response.	0.2	
10/17/2017	KES	Update electronic research file; OCR client electronic file.	0.4	
10/18/2017	GCG	Review and analyze defendants' supplemental declaration enclosing the Rostel declaration.	0.1	
10/18/2017	GCG	Conf w/ and email to DM re arb opp.	0.2	
10/18/2017	DWM	Investigating POA issues re named plaintiff, writing and circulating thoughts on possible legal arguments.	1.1	
10/18/2017	DWM	Analysing potential client documents and drafting declaration.	0.7	
10/18/2017	DWM	Write-up of meeting w potential client and sending photos and correspondence to KES to file.	0.3	
10/18/2017	DWM	Discussing doc management w/ KES and alerting her to naming problems.	0.2	
10/18/2017	DWM	Discussion w GCG re Mot. to Compel.	0.1	
10/18/2017	DWM	Draft and circulate memo re onsite interview w potential client.	2.2	
10/18/2017	DWM	Update plaintiff meeting memo with relevant photos.	0.2	
10/18/2017	DWM	(Billing Judgment) Discuss memo w CG.	0.0	0.1
10/18/2017	DWM	Review email from potential plaintiff.	0.1	
10/18/2017	KES	Download and circulate pleading.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 61

SERVICES

Date	Person	Description of Services	Hours	Discount
10/18/2017	KES	Organize additional client documents and upload to CaseMap.	0.5	
10/19/2017	BBK	Review draft declarations in support of Pls' opposition to motion to compel arbitration.	0.2	
10/19/2017	BBK	Review Brookdale counsel's ltr to GCG re: records requests.	0.1	
10/19/2017	BBK	Review DWM memo re: meeting w/ prospective class member at Brookdale Vallejo Hills.	0.2	
10/19/2017	CDH	Conf w DM re case status, next steps.	0.4	
10/19/2017	DWM	(Billing Judgment) Setting up calendar time to call potential named plaintiff.	0.0	0.1
10/19/2017	DWM	Prepare for and conduct meeting with CDH re status of tasks and ongiong plan.	0.7	
10/19/2017	DWM	(Billing Judgment) Corresponding w KES re updating contact list.	0.0	0.5
10/19/2017	DWM	Research on retaliation under ADA, Unruh Civil Rights Act, Elder Financial Abuse Act.	0.6	
10/19/2017	DWM	Call w/ potential named plaintiff to discuss issue of retailiation and other questions re retainer.	0.4	
10/19/2017	DWM	Responding to questions from potential named plaintiff.	0.3	
10/19/2017	DWM	Review email from potential named plaintiff.	0.1	
10/19/2017	KJJ	(Billing Judgment) Confer with D. Mauney re: protections from retaliation in ADA and Unruh Act, follow-up correspondence re: same.	0.0	0.2
10/19/2017	DWM	Review email and photo describing incident at Brookdale site involving potential named plaintiff.	0.1	
10/19/2017	KES	Follow up re status of client documents.	0.1	
10/20/2017	DWM	Responding to potential named plaintiff concerns.	0.1	
10/20/2017	DWM	Review relevant legal news.	0.1	
10/20/2017	DWM	Review defendant's filings re arbitration.	1.0	
10/20/2017	DWM	Review class member emails.	0.1	
10/20/2017	DWM	Research re successors in interest.	0.1	
10/20/2017	DWM	Review Brookdale declarations and attachments for successor issues.	0.8	
10/20/2017	KES	Organize new client documents and upload to CaseMap; review information re potential new plaintiff.	0.9	
10/22/2017	DWM	Drafting Opposition to Mot. to Compel.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/23/2017	GCG	Legal research re arbitration clauses; emails to CP, DM and CDH re same.	0.4	
10/23/2017	GCG	Revise DM memo re facts.	0.1	
10/23/2017	GCG	Conf w/ TM and DM re arbitration clause and evacuation problems.	0.2	
10/23/2017	GCG	Conf w/ DM re potential plaintiffs and arbitration opposition.	0.2	
10/23/2017	DWM	Drafting successor-in-interest section.	0.7	
10/23/2017	DWM	Legal research re successors-in-interest and email w GCG re plaintiff memo.	0.6	
10/23/2017	DWM	Editing memo re potential client meeting.	0.4	
10/23/2017	DWM	Updating memo re potential client meeting and circulating to co-counsel.	0.5	
10/23/2017	DWM	Call w/ class member and GCG.	0.1	
10/23/2017	DWM	Reviewing emails re arbitration arguments and researching new potential arguments.	0.9	
10/23/2017	DWM	Review and respond to email from potential client.	0.2	
10/23/2017	DWM	Review memo w add'l pictures.	0.1	
10/23/2017	DWM	Meeting w GCG to discuss status of brief and plaintiff tracking.	0.2	
10/23/2017	DWM	Research and drafting re successors-in-interest.	0.4	
10/23/2017	DWM	Emailing client to ask for photos.	0.1	
10/24/2017	GCG	Conference with JC re evacuation and arbitration.	0.2	
10/24/2017	GCG	Conference with SG re evacuation and arbitration.	0.3	
10/24/2017	GCG	Work on arbitration opposition.	0.3	
10/24/2017	GCG	Emails with co-counsel re arbitration opposition.	0.2	
10/24/2017	CDH	Conf w DM re opp to motion to compel.	0.2	
10/24/2017	DWM	Review previous co-counsel emails re add'l plaintiffs and send note to GCG.	0.1	
10/24/2017	DWM	Reveiw emails re individuals interested in Brookdale case.	0.1	
10/24/2017	DWM	Review article w anti-arbitration argument.	0.1	
10/24/2017	DWM	Research and drafting equitable estoppel section of brief.	1.3	
10/24/2017	DWM	Continuing research and drafting of opp'n to mot to compel focusing on third-party imposition of arb. and defenses.	1.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/24/2017	DWM	Adding to section on state law in brief.	0.1	
10/24/2017	DWM	Discuss status and timing of opposition w CDH.	0.2	
10/24/2017	DWM	Ask KES to search through recent document productions for residency agreements or amendments.	0.1	
10/24/2017	DWM	Research re arbitration enforceability generally and against non-signatories.	0.1	
10/24/2017	DWM	Add notes to brief re opp'n to mot. to compel.	0.2	
10/24/2017	DWM	Review emails from GCG and co-counsel.	0.1	
10/24/2017	KES	Review documents produced by Fountaingrove.	0.8	
10/25/2017	GCG	Conference with TF re joining case.	0.4	
10/25/2017	GCG	Revise HF declaration.	0.2	
10/25/2017	GCG	Conference with HF re Mr. Schmidt.	0.3	
10/25/2017	GCG	Work on arbitration opposition; emails with DM and team re same.	0.5	
10/25/2017	GCG	Revise cast of characters.	0.3	
10/25/2017	BBK	Comm'ns w/ RBGG team re: declarations of potential plaintiffs ISO oppoisition to motion to compel arbitration.	0.1	
10/25/2017	CDH	Phone call from potential class member; emails w team re same.	0.5	
10/25/2017	CDH	Legal research and emails w GCG re section 1599.81 issue.	0.5	
10/25/2017	DWM	Reveiw and respond to email re potential add'l plaintiff.	0.1	
10/25/2017	DWM	Reviewing emails re call w co-counsel.	0.1	
10/25/2017	DWM	Drafting introduction to Opp'n to Mot. to Compel.	0.9	
10/25/2017	DWM	Continuing to research and draft Opp'n to Mot. to Compel.	1.4	
10/25/2017	DWM	Continuing tighten up draft and review relevant docs.	1.5	
10/25/2017	KES	Send copy of FAC to potential class member.	0.2	
10/25/2017	KES	Research class member information.	0.1	
10/25/2017	KES	Review client file provided by defendants and mark key documents for attorney further review.	1.0	
10/26/2017	GCG	Legal research re arbitration.	0.2	
10/26/2017	GCG	Conf w/ arb expert re same.	0.2	
10/26/2017	GCG	Confs w/ CDH and DM re fact declarations IOT motion to compel.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/26/2017	GCG	Review and revise letter to AKS re 2d Amended Complaint.	0.3	
10/26/2017	GCG	Prepare for and conduct team meeting re opposition to arbitration.	0.8	
10/26/2017	BBK	Review DWM report re: research on Cal Civ Code 1953(a)(4) to arbitration clause and responses from co-counsel.	0.2	
10/26/2017	CDH	Review GCG draft ltr to opposing counsel.	0.1	
10/26/2017	CDH	Conf w co-counsel, GCG, DM.	0.8	
10/26/2017	DWM	Review emails from GCG and CDH.	0.1	
10/26/2017	DWM	Discussion w CDH re Broughton-Cruz and McGill.	0.1	
10/26/2017	DWM	Draft and circulate email to co-counsel re California law and tenants.	0.2	
10/26/2017	DWM	Drafting Opp'n.	1.4	
10/26/2017	DWM	Perform legal research and draft Opp'n section re inconsistent subsequent contracts.	1.6	
10/26/2017	DWM	Continuing to draft portions of opp'n and research implied contract rescission.	1.2	
10/26/2017	DWM	Call w co-counsel re briefs and amendments to complaint; short internal meeting following cal.	0.8	
10/26/2017	DWM	Circulate motion checklist.	0.2	
10/26/2017	DWM	Drafing opp'n to mot. to compel.	0.2	
10/26/2017	DWM	Revising argument for named plaintiff and arbitration.	0.2	
10/26/2017	DWM	Review letter to opposing counsel by GCG.	0.1	
10/26/2017	KES	Update master tracking chart.	0.2	
10/27/2017	GCG	Research re arbitration clauses/opp to MTC.	0.5	
10/27/2017	GCG	Confs w/ MLF and DM and emails to CDH re same.	0.2	
10/27/2017	GCG	Revise declaration IOT MTC.	0.1	
10/27/2017	GCG	Conf w/ DM re same and re other potential plaintiffs.	0.2	
10/27/2017	GCG	Conf w/ and emails to GW re letter to AKS re second amended complaint.	0.5	
10/27/2017	GCG	Review letter from AKS re Fountaingrove evaculation and client files.	0.1	
10/27/2017	CDH	Conf w DM re opp to mtn to compel.	0.1	
10/27/2017	CDH	Draft memo to team re unconsionability.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/27/2017	CDH	Draft outline of unconscionability section.	1.8	
10/27/2017	CDH	Draft unconscionablity section.	1.3	
10/27/2017	DWM	Drafting Opp'n to mot. to dismiss, particularly reviving argument re invalid POAs.	0.9	
10/27/2017	DWM	Drafting and research re need for personal knowledge in affidavits.	0.2	
10/27/2017	DWM	Check-in w CDH re briefing process.	0.2	
10/27/2017	DWM	Continuing to draft opp'n, focusing on successors.	0.7	
10/27/2017	DWM	Continuing Opp'n draft focusing on equitable arguments.	2.3	
10/27/2017	DWM	Reviewing and responding to GCG remails re arugments to make and case status.	0.2	
10/27/2017	DWM	Wrapping up estoppel arguments in opp'n.	0.2	
10/27/2017	DWM	Meeting w/ GCG to discuss status of briefing.	0.1	
10/29/2017	GCG	Emails to SC and CDH re interviewing named plaintiffs re unconscionability issues.	0.1	
10/29/2017	CDH	Additional legal research re unconscionability.	3.7	
10/29/2017	DWM	Drafting final section of oppn.	1.0	
10/30/2017	GCG	Confs w/ potential clients re arbitration agreements and issues at Brookdale.	0.8	
10/30/2017	GCG	Confs w/ DM and emails to CDH re revisions to arbitration brief and drafting supporting declarations.	0.4	
10/30/2017	GCG	Emails w/ SC and team re client declarations.	0.1	
10/30/2017	GCG	Emails to KES and team re updating files and tracking sheets.	0.2	
10/30/2017	CDH	Emails re decls from clients.	0.3	
10/30/2017	CDH	Legal research re unconscionability.	0.6	
10/30/2017	CDH	Draft unconscionability section.	4.9	
10/30/2017	CDH	Revise DM's draft material for opp to mtn to compel and incorporate unconscionability material.	3.3	
10/30/2017	CDH	Call w Sarah Colby re same.	0.2	
10/30/2017	DWM	Review email from CDH and review and seeking advice re email from classmember.	0.1	
10/30/2017	DWM	Revising and drafting opp'n to mot to dismiss.	0.9	
10/30/2017	DWM	Review emails between CDH and co-counsel.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2017	DWM	Continue revising introductory material in opp'n to mot to compel.	0.5	
10/30/2017	DWM	Continuing to draft opp'n to mot to compel.	1.3	
10/30/2017	DWM	Discuss path forward on Opp'n to Mot to Compel w CDH.	0.2	
10/30/2017	DWM	Review potential client email.	0.1	
10/30/2017	DWM	Review emails from colleagues and co-counsel.	0.1	
10/30/2017	DWM	Review GCG and KES emails and respond to KES.	0.2	
10/30/2017	DWM	Responding to emails from GCG and classmember.	0.2	
10/30/2017	DWM	Editing and updating classmember declaration.	0.6	
10/30/2017	DWM	Email classmember retainers to GCG.	0.1	
10/30/2017	DWM	Discuss DMS issue w CG.	0.1	
10/30/2017	DWM	Reviewing GCG emails.	0.1	
10/30/2017	DWM	Short meeting w GCG.	0.2	
10/30/2017	FFV	(Billing Judgment) Rename and save to the DMS Ltrs re Carlson record request and community updates.	0.0	0.2
10/30/2017	KES	Review files for signed co-counsel agreement and update electronic files with scanned signature pages.	0.9	
10/30/2017	KES	Review and gather documents re former Brookdale residenta and update tracking chart re same.	0.3	
10/30/2017	KES	Download, organize and review new client documents.	0.9	
10/30/2017	KES	Review emails with clients.	0.1	
10/31/2017	GCG	Fact research re Brookdale.	0.2	
10/31/2017	GCG	Conf w/ ML re declaration.	0.5	
10/31/2017	GCG	Revise and send ML declaration.	0.2	
10/31/2017	GCG	Emails to ML re POA.	0.1	
10/31/2017	GCG	Emails to MH re residency agreement; review same.	0.3	
10/31/2017	GCG	Confs w/ DM and emails to BBK and team re plaintiffs who opted out of arbitration.	0.5	
10/31/2017	GCG	First review of arbitration opposition brief; email CDH and DM re big picture comments.	1.2	
10/31/2017	GCG	Email from TF re status.	0.1	
10/31/2017	BBK	Review article on Brookdale's response to Sonoma fires.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/31/2017	BBK	RBGG team comm'ns re: obtaining declarations from prospective named plaintiffs who opted out of arbitration.	0.1	
10/31/2017	CDH	Review compiled version of opp to mtn to compel and send to GCG.	0.6	
10/31/2017	CDH	Review and edit draft Lytle decl.	0.2	
10/31/2017	DWM	Review CDH comments on draft opp'n.	0.1	
10/31/2017	DWM	Editing and commenting on opp'n to mot. to compel draft.	2.3	
10/31/2017	DWM	Review potential client and GCG emails.	0.1	
10/31/2017	DWM	Touch base w GCG re potential class member.	0.1	
10/31/2017	DWM	Email re potential client.	0.1	
10/31/2017	DWM	Revise decl for intended client.	0.5	
10/31/2017	DWM	Discuss updates to declarations w GCG.	0.1	
10/31/2017	DWM	Update declarations and review declarant docs.	0.4	
10/31/2017	DWM	Respond to GCG email re POAs to submit.	0.1	
10/31/2017	DWM	Respond to email re add'l arbitration opt out.	0.1	
10/31/2017	DWM	Revising declarations.	0.6	
10/31/2017	DWM	Revise opposition.	0.3	
10/31/2017	DWM	Meeting w GCG.	0.2	
10/31/2017	DWM	Email to co-counsel re declarations.	0.2	
10/31/2017	DWM	Call w/ potential client.	0.2	
10/31/2017	KES	Organize and upload additional client documents to CaseMap and DMS; review and gather selected documents for attys.	2.0	
11/1/2017	GCG	Research re Brookdale Arb agreements, Merril Gardens background, cost of arbitration.	0.2	
11/1/2017	GCG	Conf w/ ML re declaration.	0.1	
11/1/2017	GCG	Conf w/ DM re revisions to HF declaration; revise same.	0.2	
11/1/2017	GCG	Emails to SC and team re additional declarations.	0.1	
11/1/2017	GCG	Conf w/ and email to BBK re ombudsman call.	0.2	
11/1/2017	GCG	Conf w/ KES re Paulin Creek resident; email MM re same.	0.2	
11/1/2017	GCG	Conf w/ and emails to DM and CDH re revisions to opposition brief.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/1/2017	BBK	Review materials in prep for call to BEastes re: residents who opted out of arbitration clause.	0.4	
11/1/2017	BBK	(Billing Judgment) Searching for BEastes' cell phone in hard file and DMS (including comm'ns w/ GCG and GM); updating contacts list.	0.0	0.5
11/1/2017	BBK	Phonecall w/ BEastes.	0.2	
11/1/2017	BBK	Draft/send update to team re: call w/ BEastes.	0.1	
11/1/2017	BBK	Review KES report re: call w/ Brookdale Paulin Creek resident.	0.1	
11/1/2017	CDH	Prep for call with Chris Eidler; call with Chris Eidler; draft memo re same.	0.8	
11/1/2017	CDH	Confs w GCG and DM re opp to mtn to compel.	0.9	
11/1/2017	CDH	Research re public injunctive relief issue.	0.8	
11/1/2017	CDH	Research severance of unconscionable terms.	0.7	
11/1/2017	CDH	Research re FRE 602.	0.2	
11/1/2017	CDH	Revise opp to mtn to compel.	2.5	
11/1/2017	DWM	Review colleague and co-counsel emails and revised declaration.	0.1	
11/1/2017	DWM	Meeting w/ GCG and CDH to discuss draft opp'n to mot to compel.	0.8	
11/1/2017	DWM	Review colleague emails re Brookdale, Merrill Gardens, and witness.	0.1	
11/1/2017	DWM	Review BBK email re arbitration agreements and current residents.	0.1	
11/1/2017	DWM	Call w prospective client.	0.2	
11/1/2017	DWM	Editing and revising opp'n to mot. to compel.	1.3	
11/1/2017	DWM	Editing and circulating declaration; meeting w GCG re declaraiton.	0.8	
11/1/2017	DWM	Meeting w CDH on process for continuing to work on brief.	0.1	
11/1/2017	DWM	Review emails re status of declarations and opp'n arguments from colleagues.	0.1	
11/1/2017	DWM	Revising opp'n brief; short conference w GCG re progress.	1.7	
11/1/2017	DWM	Review GCG emails and linked articles.	0.1	
11/1/2017	DWM	Revising opposition to mot. to compel.	1.3	
11/1/2017	DWM	Revising and cutting opp'n to mot. to compel.	1.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/1/2017	KES	Telephone conference with Brookdale Paulin Creek resident; summarize discussion and email team re same.	1.1	
11/1/2017	KES	Update electronic press file.	0.1	
11/1/2017	FGL	(Billing Judgment) Email from/to CDH re Eidler declaration iso Opposition and edit/format same.	0.0	0.1
11/2/2017	GCG	Research and revise draft opposition to motion to compel arbitration.	1.7	
11/2/2017	GCG	Confs w/ CDH, DM and KES and emails to BBK re same and re interviews w/ propective clients who opted out of arbitration.	0.5	
11/2/2017	GCG	Conf w/ CDH re interview at Brookdale San Ramon.	0.1	
11/2/2017	GCG	Conf w/ GW re declarations ISO opp to arbitration.	0.2	
11/2/2017	GCG	Emails to GW, SC and team re opposition to motion to dismiss.	0.3	
11/2/2017	GCG	Emails to ML re declaration.	0.2	
11/2/2017	BBK	Comm'ns w/ KES and GCG re: follow-up call w/ Brookdale Paulin Creek resident re: referral to lawyer and problems w/ Brookdale.	0.2	
11/2/2017	BBK	Prep for call w/ Brookdale Paulin Creek resident re: referral lawyer and problems w/ Brookdale.	0.2	
11/2/2017	BBK	Call w/ Brookdale Paulin Creek resident.	0.5	
11/2/2017	BBK	Draft email memo to RBGG team re: call w/ Brookdale Paulin Creek resident; update tracking chart.	0.3	
11/2/2017	BBK	Comm'ns w/ KES/GCG re: following up w/ Brookdale Cherry Hill resident to obtain declaration.	0.1	
11/2/2017	BBK	Review KES memo re: call w/ Brookdale Cherry Hill resident and section of her contract opting out of arbitration.	0.4	
11/2/2017	BBK	Drafting declaration in opposition to motion to compel arbitration for Brookdale Cherry Hill resident.	0.4	
11/2/2017	BBK	Meeting w/ GCG re: declarations in support of motion.	0.2	
11/2/2017	BBK	Comm'ns w/ team re: reviewing draft opposition to motion to dismiss.	0.1	
11/2/2017	CDH	(Reduced Charge) Travel to and to and from and conduct client interviews at Brookdale San Ramon.	1.0	1.0
11/2/2017	CDH	Review and edit DM's draft material re POA.	0.6	
11/2/2017	CDH	Review and edit opp to MTD.	2.6	
11/2/2017	CDH	Revise opp to mtn to compel.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/2/2017	CDH	Conduct client interviews at Brookdale San Ramon.	2.6	
11/2/2017	DWM	Revising and cutting opp'n to mot. to compel.	0.3	
11/2/2017	DWM	Emails to update GCG and CDH of brief status.	0.1	
11/2/2017	DWM	Check-in w GCG re brief and declaration.	0.1	
11/2/2017	DWM	Review and close loop on class member email.	0.3	
11/2/2017	DWM	Draft email to GCG and CDH re cost of arbitration.	0.1	
11/2/2017	DWM	Reviewing POAs filed by Defs and law re POAs and arbitration agreements.	0.4	
11/2/2017	DWM	Drafting GCG decl.	0.4	
11/2/2017	DWM	Discuss classmember call strategy w KES.	0.1	
11/2/2017	DWM	Drafting and revising opposition addition.	0.5	
11/2/2017	DWM	Touch base w GCG and CDH; review CGC edits.	1.5	
11/2/2017	DWM	Review collegue emails re classmembers.	0.1	
11/2/2017	DWM	Meet w CDH re Decl.	0.1	
11/2/2017	DWM	Drafting Grunfeld Decl.	0.7	
11/2/2017	DWM	Review co-counsel emails.	0.1	
11/2/2017	DWM	Research rates for arbitrators.	0.3	
11/2/2017	DWM	Touch base w GCG and KES re documents provenance of docs.	0.2	
11/2/2017	DWM	Phone call w CDH.	0.2	
11/2/2017	DWM	Write argument re POA.	0.2	
11/2/2017	KES	Lengthy tc with class member; confer GCG and DM re same; follow up email re same; memo re issues discussed on call and distribute to team; update client documents files.	2.3	
11/2/2017	KES	TC from relative of potential class member and confer GCG re same.	0.2	
11/2/2017	KES	Review team emails re follow up conversations with class members.	0.3	
11/2/2017	KES	Confer DM re documents in support of opposition to motion.	0.2	
11/2/2017	FGL	(Billing Judgment) Confer with GG re edits to opposition to motion to compel and edit same.	0.0	1.1
11/3/2017	GCG	Review and revise co-counsel's opposition to motion to dismiss.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/3/2017	GCG	Emails to CDH, SC and team re same.	0.2	
11/3/2017	GCG	Confs w/ DM re proposed order, Grunfeld declaration and other supporting declarations.	0.2	
11/3/2017	GCG	Draft memo to file re interview w/ former employee.	0.2	
11/3/2017	GCG	Revise supporting declarations; emails to BBK, SC and team re same.	0.2	
11/3/2017	GCG	Emails to ML re declaration and conf w/ DWM re meeting w/ MC.	0.2	
11/3/2017	BBK	Plan for F/U call w/ Brookdale Cherry Hill resident.	0.3	
11/3/2017	BBK	Call w/ Brookdale Cherry Hill resident.	0.4	
11/3/2017	BBK	Draft email memo reporting on call w/ Brookdale Cherry Hill resident to RBGG team; update tracking chart.	0.3	
11/3/2017	BBK	Review proposed revisions to draft declaration ISO opp'n to motion to compel arb by GCG and DWM.	0.1	
11/3/2017	BBK	Revisions to draft declaration ISO opp'n to motion to compel arbitration to add allegations of continuing harms (including review of relevant portions of draft Opposition and FAC for context).	0.6	
11/3/2017	BBK	Review Brookdale residency agreement faxed by Cherry Hills resident.	0.2	
11/3/2017	BBK	Update RBGG team re: receipt of residency agreement and revised declaration.	0.2	
11/3/2017	BBK	Draft/send email to co-counsel sharing draft declaration and soliciting comments; comm'ns w/ SColby re: revisions thereto.	0.2	
11/3/2017	BBK	Review draft Opposition to Motion to Dismiss w/ CH redlines.	0.4	
11/3/2017	BBK	Review comm'ns w/ co-counsel re: sharing proposed revisions to oppositions.	0.1	
11/3/2017	BBK	Conference w/ KES re: call from daughter of deceased Brookdale Paulin Creek resident reporting concerns like those raised in complaint and plan for follow-up.	0.3	
11/3/2017	BBK	Review GCG memo re: interview w/ Brookdale Fountaingrove former wellness nurse.	0.1	
11/3/2017	DWM	Revising filing checklist and preparing filing.	1.6	
11/3/2017	DWM	Review co-counsel emails.	0.3	
11/3/2017	DWM	Drafting GCG Decl. and reviewing all attachments.	1.6	
11/3/2017	DWM	Reviewing co-counsel emails and documents; and sending response.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/3/2017	DWM	Discussion w KES re brookdale resident call.	0.1	
11/3/2017	DWM	Update tracking chart.	0.1	
11/3/2017	DWM	Meeting w GCG re progress on plaintiff declaration.	0.1	
11/3/2017	DWM	Call w prospective client and classmember.	0.1	
11/3/2017	DWM	Review model proposed order.	0.1	
11/3/2017	DWM	Quick review of co-counsel's brief.	0.1	
11/3/2017	DWM	Call w GCG and email to potenial client.	0.1	
11/3/2017	DWM	Review client and co-counsel emails.	0.1	
11/3/2017	DWM	Call w co-counsel.	0.3	
11/3/2017	DWM	Review declarations.	0.3	
11/3/2017	DWM	Follow up w GCG re calls.	0.1	
11/3/2017	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
11/3/2017	KES	Telephone conversation with relative of former Brookdale residents; confer BBK and DM re same; follow up email re same; begin memo re same; update master class member chart re same.	1.4	
11/3/2017	KES	Follow up telephone call from class member; review class member document and memo re atty follow up; prepare cover letter and send copy of complaint to same.	0.6	
11/3/2017	KES	Prepare exhibits for opposition to motion.	0.3	
11/3/2017	KES	Update electronic files and CaseMap with new client document.	0.2	
11/4/2017	GCG	Review GW, SC and DM comments on opposition to motion to compel arbitration.	0.2	
11/4/2017	GCG	Review and revise opposition to motion to dismiss; email GW and team re same.	0.9	
11/4/2017	GCG	Email to KES re declaration.	0.1	
11/4/2017	DWM	Drafting reply to co-counsel questions.	0.7	
11/4/2017	DWM	Review co-counsel response.	0.1	
11/4/2017	DWM	Review Defs mot. to strike and begin to comment on co-counsel's opposition.	1.0	
11/4/2017	DWM	Revise co-counsel's opposition brief.	1.5	
11/5/2017	GCG	Review and revise opposition to motion to strike class allegations.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/5/2017	GCG	Email DM and team re same, and re further research projects and re proposed order.	0.2	
11/5/2017	GCG	Review and revise Grunfeld decl IOT motion to compel.	0.1	
11/5/2017	DWM	Prepare draft proposed order denying defs' mot. to compel.	1.1	
11/5/2017	DWM	Editing and recirculating proposed order.	0.2	
11/6/2017	GCG	Conf w/ SC and DM re revisions to opp to MTC.	0.3	
11/6/2017	GCG	Confs w/ and emails to DM and team re multiple revisions to pleadings IOT MTC.	1.0	
11/6/2017	GCG	Emails to GW and SC re opp to motion to strike and dismiss.	0.8	
11/6/2017	BBK	Review GWallace comments on Opposition to Motion to Compel Arbitration; comm'ns w/ co-counsel re: finalizing Oppositions and supporting Decls to Brookdale motions.	0.1	
11/6/2017	BBK	Phonecall w/ Brookdale Cherry Hill resident and her assistant.	0.4	
11/6/2017	BBK	Send approved declaration to Brookdale Cherry Hill resident and her assistant.	0.1	
11/6/2017	BBK	Draft email memo to RBGG team re: obtaining signed declaration from Brookdale Cherry Hill resident and her further reports of understaffing & overcharging by Brookdale.	0.2	
11/6/2017	BBK	Call w/ Brookdale Paulin Creek resident re: her residency agreement; update RBGG team.	0.2	
11/6/2017	BBK	Comm'ns w/ KES/DWM/GCG re: follow-up w/ Brookdale Cherry Hills resident re: declaration and receipt of signed decl.	0.1	
11/6/2017	CDH	Conf w DM re opp to mtn to compel.	0.1	
11/6/2017	DWM	Review and respond to co-counsel comments on draft.	0.2	
11/6/2017	DWM	Coordinating meetings w co-counsel and classmembers.	0.1	
11/6/2017	DWM	Research on Brookdale and arbitration.	0.3	
11/6/2017	DWM	Call w co-counsel re brief and wrap up w GCG.	0.5	
11/6/2017	DWM	Call w KES re Bates stamp issues and prep of attachments.	0.1	
11/6/2017	DWM	Database research and call w classmember re docs that was searching for.	0.4	
11/6/2017	DWM	Research re Brookdale staffing.	0.2	
11/6/2017	DWM	Research on Brookdale complaints.	0.7	
11/6/2017	DWM	Review colleague memo re conversation w declarant.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/6/2017	DWM	Returning message about Brookdale related call.	0.1	
11/6/2017	DWM	Revising Grunfeld Declaration and adding appropriate exhibits.	0.6	
11/6/2017	DWM	Review briefing tasks.	0.1	
11/6/2017	DWM	Updating filing checklist and passing to GCG.	0.3	
11/6/2017	DWM	Research on brookdale and unconscionability and reviewing related declarations.	0.7	
11/6/2017	DWM	(Billing Judgment) Retrieve, review, and save as Ex. classmember doc.	0.0	0.1
11/6/2017	DWM	Review changes to proposed order and discuss w GCG.	0.2	
11/6/2017	DWM	Reviewing Grunfeld Decl.	0.1	
11/6/2017	DWM	Looking for cases re class cert. and assisted living and coordinating declarations w KES.	0.7	
11/6/2017	DWM	Review and circulate Grunfeld Decl.	0.3	
11/6/2017	DWM	Wrap up research on class actions and assisted living; checked in w GCG on results.	0.5	
11/6/2017	DWM	Touch base w GCG on brief progress and filing process.	0.2	
11/6/2017	DWM	Touch base w CDH on co-counsel arguments.	0.2	
11/6/2017	DWM	Database search for docs relevant to brief.	0.3	
11/6/2017	KES	Review and revise exhibits for opposition to motion.	3.2	
11/6/2017	KES	TC potential class member.	0.1	
11/6/2017	FGL	(Billing Judgment) Email from and confer with DM re revisions to exhibits to GCG decl and revise same.	0.0	0.5
11/6/2017	FGL	(Billing Judgment) Email from/to GG re redline of draft MPA and redline same.	0.0	0.1
11/6/2017	FGL	(Billing Judgment) Confer with DM re edits to GG declaration and edit same.	0.0	0.2
11/7/2017	GCG	Review and revise Grunfeld declaration and exhibits.	0.5	
11/7/2017	GCG	Review and revise proposed order.	0.2	
11/7/2017	GCG	Review and revise brief.	1.0	
11/7/2017	GCG	Conf w/ and emails to DM, CDH and KES re same.	0.5	
11/7/2017	GCG	Conf w/ FJ re declaration.	0.4	
11/7/2017	GCG	Draft letter to FJ re retaliation.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/7/2017	GCG	Emails w/ SG re executive director and family council minutes.	0.1	
11/7/2017	GCG	Review minutes.	0.1	
11/7/2017	GCG	Emails to GW and SC re class cert brief and standing orders.	0.2	
11/7/2017	SJR	Emails from/to GG re arbitration rates.	0.2	
11/7/2017	CDH	Citecheck opp to mtn to compel.	1.9	
11/7/2017	CDH	Review and edit revised draft of opp to MTD.	0.4	
11/7/2017	DWM	Reviewing GCG Decl. and reading case law re Brookdale.	0.4	
11/7/2017	DWM	Review and input co-counsel edit.	0.1	
11/7/2017	DWM	Touching base w GCG, KES, and CDH re drafting Opp'n to Mot. to Compel and last potential declarant.	0.2	
11/7/2017	DWM	Revising Opp'n to Mot. to Compel including re-drafting one seciton.	1.0	
11/7/2017	DWM	(Billing Judgment) Working w WP to resolve version control problem.	0.0	0.2
11/7/2017	DWM	Cutting brief down.	0.1	
11/7/2017	DWM	Touch base w CDH on process for cite checking.	0.1	
11/7/2017	DWM	Revising Opp'n to Defs Mot to Compel.	1.5	
11/7/2017	DWM	Continuing to revise Opp'n to Mot. to Compel.	0.3	
11/7/2017	DWM	Email CDH re brief process.	0.1	
11/7/2017	DWM	Respond to GCG filing questions.	0.1	
11/7/2017	DWM	Meeting w GCG re additional filing tasks.	0.1	
11/7/2017	DWM	Updating checklist and reviewing emails from classmembers.	0.1	
11/7/2017	KES	Voicemail and tc with potential class member and follow up with team re same.	0.6	
11/7/2017	KES	Prepare exhibits and other documents for opposition to motion to compel arbitration.	2.3	
11/8/2017	GCG	Conf w/ FJ re declaration.	0.1	
11/8/2017	GCG	Final review of Grunfeld declaration and opposition brief.	0.2	
11/8/2017	GCG	Conf w/ DM re potential client.	0.1	
11/8/2017	GCG	Emails to DM, GW and CDH re finalizing briefs.	0.1	
11/8/2017	GCG	Conf w/ CDH re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/8/2017	BBK	Review updates re: Brookdale Cherry Hill resident's fears of retaliation.	0.1	
11/8/2017	BBK	Review updated draft Opp'n to Motion to Compel Arbitration.	0.2	
11/8/2017	CDH	Citecheck and edit opp to mtn to compel.	1.8	
11/8/2017	CDH	Conf w GCG re edits to mtn to compel; emails re same.	0.2	
11/8/2017	DWM	(Billing Judgment) Confirm meeting for 2 pm today and reserve car.	0.0	0.2
11/8/2017	DWM	(Billing Judgment) Requesting prep of retainer from WP.	0.0	0.1
11/8/2017	DWM	Review retainer agreement.	0.1	
11/8/2017	DWM	Responding to colleague emails re state of briefing and communications w declarants.	0.2	
11/8/2017	DWM	Revising Opposition and checking GCG edits.	0.8	
11/8/2017	DWM	(Reduced Charge) Travel to and from Santa Rosa.	1.0	1.0
11/8/2017	DWM	Touch base w GCG re outstanding filing issues.	0.1	
11/8/2017	DWM	Meet w KES re document redactions.	0.1	
11/8/2017	DWM	Cite check Grunfeld Decl. and match to redacted docs.	0.3	
11/8/2017	DWM	Cite checking proposed order.	0.7	
11/8/2017	DWM	Meet w potential client.	3.1	
11/8/2017	KES	Confer team re opposition papers; review declarations and exhibits and redact private information from same.	1.6	
11/9/2017	GCG	Final review of opposition pleadings.	0.5	
11/9/2017	GCG	Oversee e-filing and delivery of courtesy copies.	0.2	
11/9/2017	GCG	Confs w/ DM and emails to team re same.	0.4	
11/9/2017	GCG	Conf w/ PJ re declaration.	0.1	
11/9/2017	GCG	Email to SG re grandmother death.	0.1	
11/9/2017	BBK	Review comm'ns w/ team re: filing of Oppositions to Brookdale Motions and submisison of proposed orders and courtesy copies to Judge.	0.1	
11/9/2017	BBK	Review Pls' Opposition to Brookdale's Motion to Dismiss.	0.2	
11/9/2017	CDH	Additional legal research re unconscionability.	1.5	
11/9/2017	CDH	Review and citecheck proposed order denying MTD.	0.5	
11/9/2017	CDH	Emails w co-counsel re efiling.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/9/2017	CDH	Review final version of opp to mtn to compel.	0.6	
11/9/2017	CDH	Review Judge Donato's standing orders.	0.1	
11/9/2017	DWM	Discussing last tasks w brief.	0.2	
11/9/2017	DWM	Checking in with GCG re last declarant and final process for brief.	0.1	
11/9/2017	DWM	Checking local rules and standing order for submission proceedures; cite checking unconscionability section.	1.0	
11/9/2017	DWM	Review CDH unconscionability analysis and redactions in Declarant exhibits.	0.5	
11/9/2017	DWM	Review substantive change in br. w GCG.	0.4	
11/9/2017	DWM	(Billing Judgment) Transmit attachments to KES for placement in filing folder.	0.0	0.1
11/9/2017	DWM	Final review of Grunfeld Decl. and Proposed Order Text.	0.2	
11/9/2017	DWM	Review and cite check co-counsel's proposed order.	0.4	
11/9/2017	DWM	Circulate final Br. version and review all other pdfs.	0.1	
11/9/2017	DWM	Review filing checklist.	0.1	
11/9/2017	DWM	Circulate next steps; make GCG aware of where we are in process for filing.	0.1	
11/9/2017	DWM	Checking in w co-counsel re filing time.	0.1	
11/9/2017	DWM	Filing Opp'n on ECF.	0.5	
11/9/2017	DWM	Review local rules, communicating w colleagues about courtesy copies and review co-counsel filings.	0.3	
11/9/2017	DWM	Review CDH edits and circulate order edits to co-counsel.	0.1	
11/9/2017	FGL	(Billing Judgment) Email from/to DM re edit to opposition to motion to compel arbitration and edit same.	0.0	0.1
11/9/2017	KES	Revise, finalize and file papers for opposition to motion to compel; prepare and serve chambers copy, email proposed order re same; update electronic files with all opposition papers.	4.0	
11/10/2017	BBK	Review Opposition to Brookdale's Motion to Strike Class Allegations.	0.4	
11/10/2017	BBK	Review DWM report re: death of prospective class member and obituary.	0.1	
11/10/2017	DWM	Reviewing classmember's death notice and composing note of sympathy for family.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/10/2017	DWM	Corresponding with legal representative of recently deceased classmember.	0.1	
11/10/2017	KES	Review email re class member.	0.1	
11/13/2017	GCG	Emails to DM, KES and CDH re potential new plaintiff; conf w/ DM re same.	0.3	
11/13/2017	GCG	Email to HT re Court approval of retainer.	0.1	
11/13/2017	GCG	Conf w/ DG re mother's death due to Brookdale negligence.	0.2	
11/13/2017	BBK	Review HFisher/GCG comm'ns re: obtaining court approval for BKD resident under her conservatorship to join lawsuit as named Plaintiff.	0.1	
11/13/2017	BBK	Review KES report re: call from BKD Scotts Valley resident & letter from Scotts Valley Family Council to BKD corporate re: problems w/ facility; comm'ns w/ team re: plan for F/U therewith.	0.2	
11/13/2017	CDH	Review ltr from Scotts Valley residents' assn; emails re same.	0.2	
11/13/2017	DWM	Review calendar of upcoming deadlines in case.	0.1	
11/13/2017	DWM	Meeting w KES to discuss new potential clients.	0.1	
11/13/2017	DWM	Review co-counsel and colleague emails re current client status and potential new clients.	0.1	
11/13/2017	DWM	Review classmember email.	0.1	
11/13/2017	DWM	Review residents' association letter and related colleague emails.	0.2	
11/13/2017	DWM	Review classmember email; short discussion w GCG re new contact from Brookdale Resident; attempted to reach new contact but reviceved voicemail; relay discussion w GCG and plan to colleagues.	0.2	
11/13/2017	DWM	Short call w classmember, email in response to colleagues, review of email form GCG.	0.2	
11/13/2017	KES	TC potential class member and follow up emails re same; confer team re same; review client document.	0.9	
11/14/2017	GCG	Email w/ MWB re expert witness.	0.1	
11/14/2017	GCG	Conf w/ DM and emails to team re client interview.	0.1	
11/14/2017	MWB	Emails with GCG re potential expert.	0.2	
11/14/2017	KES	Confer GM re pleadings files.	0.1	
11/15/2017	GCG	Email w/ SC re complaint at local Brookdale.	0.1	
11/15/2017	GCG	Conf w/ SG re Fountaingrove.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/15/2017	GCG	Prepare for meeting w/ consultant.	0.1	
11/15/2017	BBK	Review SColby report of retaliation by Brookdale against putative class representative.	0.1	
11/15/2017	CDH	Review memo re Brookdale warning ltr to class member.	0.1	
11/15/2017	KES	Review transcription of voicemail re client.	0.1	
11/16/2017	GCG	(Reduced Charge) Travel to conduct meeting w/ GW, SC, KK and consultant MH.	0.5	0.5
11/16/2017	GCG	Meeting w/ co-counsel re Brookdale San Ramon issues and reply briefs.	0.5	
11/16/2017	GCG	Emails to CDH and DM re upcoming deadlines and tasks.	0.2	
11/16/2017	GCG	Email to plaintiffs KC and DR.	0.1	
11/16/2017	GCG	Conduct meeting w/ GW, SC, KK and consultant MH.	2.0	
11/16/2017	DWM	Review colleague email and consider issues to be brought up at meeting w co-counsel.	0.1	
11/16/2017	DWM	Leaving message for class member, and responding to doc request from GCG and other colleague emails.	0.3	
11/16/2017	DWM	Review and respond to colleague emails re upcoming case tasks.	0.1	
11/16/2017	DWM	Review colleague email re expert.	0.1	
11/16/2017	KES	(Billing Judgment) Document filing.	0.0	0.3
11/16/2017	KES	Update master chart re recent communications with potential class members.	0.3	
11/16/2017	KES	Update electronic expert file.	0.1	
11/17/2017	GCG	Prepare for team meeting re retention of experts and motion for class certification.	0.6	
11/17/2017	GCG	Conference with KES re consultant memorandum.	0.1	
11/17/2017	BBK	RBGG weekly team meeting.	0.5	
11/17/2017	CDH	Clean up and organize DMS files.	0.8	
11/17/2017	CDH	Team mtg.	0.8	
11/17/2017	DWM	(Billing Judgment) Talk w CDH re WIP folder maintenance.	0.0	0.1
11/17/2017	DWM	Review, respond to, and circulate email from class member.	0.1	
11/17/2017	DWM	Weekly team meeting to discuss case updates.	0.5	
11/17/2017	DWM	Email update to KES.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/17/2017	KES	Team meeting.	0.5	
11/17/2017	KES	Update master witness chart.	0.2	
11/17/2017	KES	Circulate documents to team.	0.3	
11/18/2017	GCG	Email SG re arbitration issues.	0.1	
11/19/2017	GCG	Review class rep report on inadequate staffing; email class rep and team re same.	0.3	
11/20/2017	GCG	Emails from KS and SC re memory care.	0.1	
11/20/2017	BBK	Review report from JCarlson re: mistreatment of HCarlson at Brookdale; comm'ns w/ co-counsel re: memory care residents.	0.1	
11/20/2017	BBK	Review memo from consulting expert & BKD Yreka care staff ratio.	0.2	
11/20/2017	CDH	Review Sarah's draft ltr re Stacy Stiner's room; draft email responding to same.	0.2	
11/20/2017	KES	Review new client documents and update client documents files and CaseMap.	0.4	
11/20/2017	KES	Review case emails.	0.1	
11/21/2017	CDH	Review academic article on SNF staffing.	0.3	
11/27/2017	GCG	Emails to GW, KS, SC and team re potential new plaintiffs and letter to defendants re lack of accessibility.	0.1	
11/27/2017	GCG	Review expert report on time studies.	0.1	
11/27/2017	GCG	Review and respond to class member communications re conservatorship, memory care issues and billing problems.	0.1	
11/27/2017	GCG	Conf w/ and emails to DM re class member declarations and new plaintiffs.	0.2	
11/27/2017	BBK	Review comm'ns w/ team re: contacting/retaining prospective class members who opted out of arbitration.	0.1	
11/27/2017	BBK	Review report from expert re: study on proper staffing for assited living facilities.	0.1	
11/27/2017	BBK	Answer query from GCG re: Brookdale Paulin Creek resident's arbitration opt-out status; update tracking chart.	0.2	
11/27/2017	BBK	Comm'ns w/ DWM re: standardizing process for documenting/confirming arbitration opt-outs for potential class members.	0.1	
11/27/2017	DWM	Reviewing colleague and co-counsel emails.	0.3	
11/27/2017	DWM	Meeting w GCG to discuss next steps in case, including prep of class cert. declarations and prep for oral argument.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/27/2017	DWM	Conf w/ paralegal re case law compiling assignment.	0.2	
11/27/2017	DWM	Discussing filing system w KES.	0.2	
11/27/2017	DWM	Review client email.	0.1	
11/27/2017	DWM	Review GCG email to co-counsel.	0.1	
11/27/2017	DWM	Work on method for compiling potential opt-out Plaintiffs.	1.0	
11/27/2017	DWM	Rewiew colleague memos re calls w classmembers; prepare call sheets; continue to revise tracking chart.	0.6	
11/27/2017	DWM	Calls to class members and write up results of class member contacts.	0.5	
11/27/2017	KES	Review new client documents and upload to CaseMap.	0.2	
11/27/2017	KES	Review emails re class member discussions.	0.1	
11/27/2017	KES	Confer DVM re files.	0.1	
11/27/2017	KES	Gather cases re motions to dismiss, strike and re arbitration.	3.7	
11/28/2017	GCG	Emails w/ DM re arbitration agreements and named plaintiffs and prep for oral argument.	0.1	
11/28/2017	DWM	Review classmember email and documents; respond, circulate to colleagues, and update tracker.	0.3	
11/28/2017	DWM	Review notes of meeting w Michele Lytle; review Lytle file and record impressions from meeting in memo.	1.7	
11/28/2017	DWM	Review class member email re arbitration.	0.1	
11/28/2017	DWM	Brought question to GCG related to class member communication and subsequently responded to class member.	0.2	
11/28/2017	KES	Review new documents from class members and update electronic files re same.	0.3	
11/29/2017	DWM	Review and update list of tasks.	0.1	
11/29/2017	DWM	Discuss case research for oral argument w KES.	0.1	
11/29/2017	KES	Gather cases cited in opposition to motion to compel arbitration and update electronic files re same.	0.8	
11/30/2017	GCG	Email to HF re retention agreement.	0.1	
11/30/2017	DWM	Review class member and GCG emails.	0.1	
11/30/2017	DWM	Review voicemail from class member and record in tracking chart.	0.1	
12/1/2017	GCG	Conf w/ DM and CDH re objections to reply evidence and interviews w/ plaintiffs.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/1/2017	GCG	Emails to GW and team re same.	0.2	
12/1/2017	GCG	Email from KK re photographs of Windsor facility.	0.1	
12/1/2017	CDH	Team mtg.	0.5	
12/1/2017	CDH	Conf w DWM re potential plaintiffs to call.	0.5	
12/1/2017	DWM	Call w class member, send follow-up email, and record notes.	0.4	
12/1/2017	DWM	Called and left messages for class members and recorded calls.	0.2	
12/1/2017	DWM	Meeting w GCG and CDH about upcoming deadlines and projects in case, including pending motions, and conversations w class members.	0.5	
12/1/2017	DWM	Reviewing and updating class member contact tracking chart.	0.4	
12/1/2017	DWM	Review local rules and standing order relevant to objections to new info raised in reply; circulate and calendar relevant dates.	0.2	
12/1/2017	DWM	Review colleague email re legal research in anticipation of reply.	0.2	
12/1/2017	DWM	Continue to update and review tracking chart and short conversation w BBK re same.	0.4	
12/1/2017	DWM	Review call tracker w CDH re past calls.	0.3	
12/1/2017	DWM	Respond to research request from colleague; discuss question w CDH and review his forwarded emails re same.	0.3	
12/1/2017	DWM	Review photos sent by co-counsel.	0.1	
12/3/2017	GCG	Review SG email and Fountaingrove family council minutes; email GW and team re same.	0.1	
12/3/2017	DWM	Review family council minutes.	0.1	
12/4/2017	GCG	Conf w/ SG re Family council issues.	0.2	
12/4/2017	GCG	Conf w/ DM re potential class rep interviews; emails re same.	0.1	
12/4/2017	GCG	Conf w/ GW and team re same and re preparation for oral argument and objections to reply evidence.	0.3	
12/4/2017	DWM	Review co-counsel emails, upcoming deadlines, and tasks.	0.1	
12/4/2017	DWM	Review message from class member.	0.1	
12/4/2017	DWM	Evidentiary objection research.	0.2	
12/4/2017	DWM	Review of previous contacts with class members, then calls to those class members, follow-up emails, and call with co-counsel about reaching out to class members.	1.7	
12/4/2017	DWM	Review co-counsel vm.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2017	DWM	Phone call w class member, type up notes and relay information to co-counsel.	0.3	
12/4/2017	DWM	Discuss class member call w GCG.	0.1	
12/4/2017	DWM	Correspond w co-counsel re class member docs.	0.1	
12/4/2017	DWM	Research on evidentiary objections.	0.9	
12/4/2017	DWM	Conference call w co-counsel to discuss outstanding motions and plaintiffs.	0.5	
12/4/2017	DWM	Review article re Judge Donato.	0.1	
12/4/2017	DWM	Phone conversation w class member.	0.3	
12/4/2017	DWM	Research and drafting for evidentiary objections.	0.6	
12/4/2017	DWM	Review class member email and attachment.	0.1	
12/4/2017	KES	Review task list.	0.1	
12/4/2017	KES	Review emails and update electronic client documents files.	0.5	
12/5/2017	GCG	Email w/ DM re Brookdale arbitration agreement.	0.1	
12/5/2017	GCG	Conf w/ KEs and email to CDH and KM re document review.	0.1	
12/5/2017	GCG	Email to JC re HC issues.	0.1	
12/5/2017	DWM	Phone call w class member; update tracker; email to colleagues.	0.3	
12/5/2017	DWM	Update class member contact list.	0.1	
12/5/2017	DWM	Correspond w class member and colleagues; analyze residency agreement; update tracking chart.	0.3	
12/5/2017	DWM	Correspond w KES about documents; update tracker.	0.3	
12/5/2017	DWM	Phone call w class member; record results in tracker; and correspond w colleagues.	0.2	
12/5/2017	DWM	Review GCG responses to emails.	0.1	
12/5/2017	DWM	Review GCG and client emails.	0.1	
12/5/2017	KES	Review emails re client documents, update electronic files and CaseMap; update document dates in CaseMap.	0.9	
12/5/2017	KES	Review emails re communications with Brookdale residents.	0.1	
12/6/2017	GCG	Email to DM re arbitration opt-out plaintiff.	0.1	
12/6/2017	DWM	Review class member emails and documents.	0.1	
12/6/2017	DWM	Review and respond to GCG email re potential client.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2017	DWM	Phone call with class member; follow up email; and record result.	0.2	
12/6/2017	KES	Review emails re communications with Brookdale residents and update client documents files.	0.3	
12/7/2017	GCG	Review and analyze reply briefs.	0.7	
12/7/2017	GCG	Conf w/ CDH re legal research for oral argument.	0.2	
12/7/2017	GCG	Conf w/ KES re same.	0.1	
12/7/2017	GCG	Conf w/ and emails to DM re class member and expert search.	0.2	
12/7/2017	DWM	Reviewing and analyzing class member documents; corresponding with class member and colleagues.	0.8	
12/7/2017	DWM	Correspond w class member.	0.1	
12/7/2017	DWM	Review class member docs and record in tracker.	0.1	
12/7/2017	DWM	Review legal research doc circulated by GCG.	0.1	
12/7/2017	DWM	Review and respond to GCG email re conflicts.	0.1	
12/7/2017	KES	Organize new client documents.	0.2	
12/8/2017	GCG	Confs w/ and emails to DM and CDH re legal issues raised by defendants' arbitration reply brief.	0.6	
12/8/2017	GCG	Work w/ KES to prepare materials for Argument.	0.2	
12/8/2017	GCG	Research Judge Donato decisions.	0.1	
12/8/2017	CDH	Conf w KM re licensing report project.	0.3	
12/8/2017	CDH	Review expert's notes circ by GCG.	0.2	
12/8/2017	CDH	Review Defs' reply ISO motion to compel.	0.3	
12/8/2017	CDH	Team mtg w GCG, DWM, KES.	0.5	
12/8/2017	DWM	Analyze defs.' reply brief and attachments.	0.8	
12/8/2017	DWM	Discuss reply brief w CDH.	0.1	
12/8/2017	DWM	(Billing Judgment) Appropriately saving replies in proper files.	0.0	0.2
12/8/2017	DWM	Team meeting re new filings.	0.5	
12/8/2017	DWM	Research, draft, and circulate short memo on potential expert.	0.3	
12/8/2017	DWM	Discuss issue of appeal with CDH.	0.1	
12/8/2017	KES	Circulate filed reply papers.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/8/2017	KES	Begin preparation of materials for oral argument of motion to compel arbitration; highlight and organize all cases cited in motion; Westlaw research re new cases cited in reply.	3.3	
12/8/2017	KES	Team meeting.	0.3	
12/9/2017	GCG	Review and analyze cases cited in defendant's opening arbitration brief.	1.0	
12/9/2017	GCG	Prepare for oral argument; draft outline.	1.0	
12/9/2017	GCG	Review and analyze defendant's declarations.	0.8	
12/9/2017	DWM	Correspond w client.	0.1	
12/11/2017	GCG	Email w/ SC re potential witness.	0.1	
12/11/2017	GCG	Continued preparation for oral argument.	0.1	
12/11/2017	CDH	Legal research re issues in reply.	3.4	
12/11/2017	CDH	Draft memo re issues in reply.	1.5	
12/11/2017	KES	TC Brookdale Windsor resident re problems and email to team re same.	0.3	
12/11/2017	KES	Review opposition and reply briefs re motion to compel and highlight and organize cases in preparation for oral argument.	2.5	
12/12/2017	DWM	Review GCG, KES and co-counsel emails re calls from class members and former Brookdale staff.	0.1	
12/12/2017	DWM	Review co-counsel email re new version of residency agreement as well as agreement itself.	0.1	
12/12/2017	DWM	Provide direction to KES for class member call and documentation.	0.1	
12/12/2017	DWM	Follow-up w KES re contact history w particular class member.	0.1	
12/12/2017	DWM	Research and draft objections to new evidence.	2.0	
12/12/2017	DWM	Review and respond to GCG email re objections.	0.1	
12/12/2017	KES	Update electronic research files.	0.2	
12/12/2017	KES	Email team and call to resident; update master chart re same.	0.3	
12/12/2017	KES	Update client documents files.	0.1	
12/12/2017	KES	Review status of CaseMap document upload.	0.1	
12/13/2017	GCG	Review and revise draft objection to reply evidence; conf w/ DM re same.	0.2	
12/13/2017	GCG	Review potential client retainer agreement; conf w/ and email to DM.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/13/2017	GCG	Emails from CDH re replies and ongoing legal research.	0.1	
12/13/2017	GCG	Conf w/ GW, SC, KK and DM re preparation for oral argument.	0.7	
12/13/2017	CDH	Conf w DWM re evidentiary objections.	0.1	
12/13/2017	CDH	Review and edit evidentiary objections.	0.8	
12/13/2017	CDH	Review Defs' reply ISO MTD and draft responses for co-counsel.	0.9	
12/13/2017	CDH	Draft memo re issues in reply.	1.3	
12/13/2017	DWM	Discussion w CDH re objections.	0.1	
12/13/2017	DWM	Review and circulate to CDH objection to reply evidence.	0.4	
12/13/2017	DWM	Discussion w CDH re changes to objections.	0.1	
12/13/2017	DWM	Revise objections to new evidence in line w CDH edits.	0.5	
12/13/2017	DWM	Researching, drafting, and circulating memo re potential appeal in Brookdale.	1.0	
12/13/2017	DWM	Review GCG comments on objections; draft email and circulate objections to co-counsel for review.	0.2	
12/13/2017	DWM	Review retainer signed by new client; ask paralegal to file; and review GCG email re follow-up.	0.1	
12/13/2017	DWM	Review DMS to be sure new client had been checked for conflicts.	0.1	
12/13/2017	DWM	Review CDH comments on MTD.	0.1	
12/13/2017	DWM	Meeting w co-counsel to discuss reply briefs.	0.9	
12/13/2017	DWM	Deep dive into new evidence submitted w Brookdale replies; draft and send thoughts to co-counsel.	0.6	
12/13/2017	KES	Review email and update electronic files.	0.1	
12/14/2017	GCG	Continued preparation for oral argument.	0.1	
12/14/2017	GCG	Confs w/ KES re cases and statutes at issue.	0.1	
12/14/2017	GCG	Confs w/ and emails to CDH and DM re legal research for oral argument and outreach to additional plaintiffs.	0.6	
12/14/2017	CDH	Conf w DWM re hearing prep.	0.5	
12/14/2017	CDH	Conf w GCG and DWM re hearing prep.	0.5	
12/14/2017	CDH	Draft memo re issues in reply.	1.8	
12/14/2017	CDH	Review DWM memo re appellate challenge to stay.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 87

SERVICES

Date	Person	Description of Services	Hours	Discount
12/14/2017	DWM	Review and respond to co-counsel email re merger docs + take extra look at those docs.	0.1	
12/14/2017	DWM	Short discussion w CDH re research for oral argument.	0.1	
12/14/2017	DWM	Meeting w CDH to go over conference call with co-counsel and discuss potential areas of additional research.	0.4	
12/14/2017	DWM	Searching for evidence brookdale/emeritus merger was legally inadequate and communicate results to GCG and CDH.	0.1	
12/14/2017	DWM	Phone call w class member and follow up w GCG re call and questions about site visit.	0.2	
12/14/2017	DWM	(Billing Judgment) Figuring out timing and directions for trip to Scotts Valley and alerting colleagues to absence.	0.0	0.1
12/14/2017	DWM	(Billing Judgment) Setting up meeting re oral argument research w GCG and CDH.	0.0	0.1
12/14/2017	DWM	Review class member residency agreement; circulate to GCG, CDH, + KES; respond to class member.	0.2	
12/14/2017	DWM	Meeting with CDH and GCG regarding oral argument prep.	0.5	
12/14/2017	DWM	Prepare, review, and revise retainer for new client.	0.4	
12/14/2017	DWM	Prepare and send to GCG list of potential clients and current situation.	0.2	
12/14/2017	DWM	Choosing documents to send to co-counsel to introduce them to potential client; preparing and sending email with mult. attachments to co-counsel.	0.2	
12/14/2017	DWM	Prepare doc requests.	0.1	
12/14/2017	KES	Update electronic documents files.	0.2	
12/14/2017	KES	Update materials for oral argument.	0.7	
12/15/2017	GCG	Prepare for oral argument; confs w/ CDH and KES re same.	0.2	
12/15/2017	GCG	Email to CDH re potential client.	0.1	
12/15/2017	GCG	Conf w/ and email to DM re Scotts Valley interviews.	0.1	
12/15/2017	GCG	Conf w/ KC re Fountaingrove demand to place MCJ in Memory care.	0.2	
12/15/2017	GCG	Review Judge Donato's order postponing oral argument; emails w/ co-counsel re same.	0.1	
12/15/2017	GCG	Draft and revise letter re amendment and discovery; emails w/ co-counsel re same.	0.2	
12/15/2017	CDH	Conf w KM re DSS report project.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/15/2017	CDH	Draft list of search terms for KM's DSS licensing report project.	0.4	
12/15/2017	CDH	Draft memo re issues in reply.	2.5	
12/15/2017	CDH	Phone call w potential class member.	0.5	
12/15/2017	CDH	Review documents from potential client.	0.2	
12/15/2017	CDH	Draft memo to team re potential client.	0.3	
12/15/2017	DWM	(Reduced Charge) Travel to Brookdale Scott's Valley.	0.8	0.9
12/15/2017	DWM	Meet with Brookdale Scott's valley residents.	6.2	
12/15/2017	DWM	Drive back from Scotts Valley to Oakland.	2.3	
12/15/2017	KES	Review court order and update electronic files; calendar new motion deadline.	0.2	
12/15/2017	KES	Update materials for oral argument.	0.3	
12/15/2017	KES	Update client documents files and CaseMap.	0.4	
12/15/2017	KES	Gather motion pleadings and arrange for update of hard copy files.	0.6	
12/15/2017	KES	Review emails re conversations with Brookdale residents.	0.1	
12/16/2017	GCG	Email CDH and KM re research for licensing complaints.	0.1	
12/17/2017	DWM	Review GCG and co-counsel emails re court order.	0.1	
12/18/2017	GCG	Research and revise letter to defendants re second amended complaint and discovery.	0.5	
12/18/2017	GCG	Conf w/ DM and emails to team re same.	0.2	
12/18/2017	GCG	Conf w/ CDH re interview w/ potential plaintiff.	0.1	
12/18/2017	GCG	Email to JC re move to memory care; forward information to team.	0.2	
12/18/2017	CDH	Conf w GCG re task for this week.	0.2	
12/18/2017	CDH	Conf w DWM re potential new plaintiffs.	0.2	
12/18/2017	CDH	Call with potential named plaintiff.	0.4	
12/18/2017	CDH	Review docs from potential named plaintif.	0.1	
12/18/2017	DWM	Review KM, GCG, and CDH emails re licensing project and new class members; update class member tracker.	0.2	
12/18/2017	DWM	Research on Rule 26 and timing o discovery requests; discuss path forward on discovery and add'l plaintiffs w GCG.	0.6	
12/18/2017	DWM	Email GCG key results of discovery research.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/18/2017	DWM	Review co-counsel analysis of new residency agreement.	0.1	
12/18/2017	DWM	Discuss Brookdale Scotts Valley visit w CDH and KES.	0.1	
12/18/2017	DWM	Review GCG letter to defs. and review co-counsel responses to it.	0.1	
12/18/2017	DWM	Review co-counsel responses to GCG letter re amending complaint as well as letter itself.	0.1	
12/18/2017	DWM	Discuss how to present add'l potential plaintiffs to co-counsel.	0.1	
12/18/2017	DWM	Review GCG and co-counsel emails re change in plaintiff placement and arbitration status.	0.1	
12/18/2017	KES	Brief review of resident documents and update electronic files re same.	0.2	
12/19/2017	GCG	Prepare for and conduct call w/ co-counsel re discovery plan and drafting second amended complaint.	1.1	
12/19/2017	GCG	Review and analyze list of new plaintiffs; confs and emails to DM and CDH re same.	0.5	
12/19/2017	GCG	Draft letter to AKS re request for files.	0.4	
12/19/2017	GCG	Prepare for call w/ potential expert.	0.2	
12/19/2017	CDH	Phone conf w co-counsel.	0.7	
12/19/2017	CDH	Conf w GCG and DWM re new plaintiffs, file requests.	0.3	
12/19/2017	CDH	Conf w HW re DSS reports project.	0.2	
12/19/2017	CDH	Emails re DSS reports project.	0.2	
12/19/2017	CDH	Research re potential expert; emails w GCG re same.	0.2	
12/19/2017	CDH	Locate and circ sample RFPs.	0.3	
12/19/2017	CDH	Review additional docs sent by potential Plaintiff.	0.2	
12/19/2017	DWM	Review co-counsel emails re meeting to discuss amending compl.	0.1	
12/19/2017	DWM	Discuss w CDH how to present possible new Pls to co-counsel.	0.1	
12/19/2017	DWM	Reply to GCG email re add'l plaintiffs.	0.1	
12/19/2017	DWM	Conference call w CDH, GCG and co-counsel re amending complaint, adding plaintiffs, and obtaining discovery in light of postponement of argument.	1.0	
12/19/2017	DWM	Review letter to client and draft email to same client.	0.2	
12/19/2017	DWM	Draft supplemental conflicts list.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/19/2017	DWM	Call to class members and update tracker.	0.1	
12/19/2017	DWM	Revise GCG letter to opposing counsel.	0.2	
12/19/2017	DWM	Review GCG, CDH, and co-counsel emails re experts.	0.1	
12/19/2017	DWM	Review GCG emails re plaintiff records.	0.1	
12/19/2017	FFV	Draft cover letter re fully executed retainer agreement to M. Lytle; finalize, save to the DMS and mail same.	0.5	
12/19/2017	HNW	Met with CH to discuss report analysis project, reviewed case content and topics of focus in analysis.	0.6	
12/20/2017	GCG	Conf w/ SC and KK re potential expert.	0.3	
12/20/2017	GCG	Research re potential expert; emails to EG and SL re same.	0.2	
12/20/2017	GCG	Conf w/ DM re letter to AKS seeking files.	0.1	
12/20/2017	GCG	Emails to DM and CDH re potential plaintiffs.	0.1	
12/20/2017	GCG	Review HS application for court approval of retainer agreement.	0.1	
12/20/2017	CDH	(Billing Judgment) Make travel arrangements for mtg w potential plaintiff.	0.0	0.2
12/20/2017	CDH	Review co-counsel's memo re call with potential expert.	0.1	
12/20/2017	CDH	Emails w potential Plaintiff.	0.3	
12/20/2017	DWM	Discuss letter to opposing counsel w GCG, review letter, review email and letter circulated to opposing counsel and co-counsel.	0.3	
12/20/2017	DWM	Setting up call w client.	0.1	
12/20/2017	DWM	Review filing re potential client w conservator.	0.1	
12/20/2017	DWM	Teleconference w Michele Lytle and update tracker to reflect it.	0.3	
12/20/2017	DWM	Review and respond to CDH and GCG emails re add'l plaintiffs.	0.1	
12/20/2017	DWM	Review co-counsel memo re potential expert.	0.1	
12/20/2017	FFV	Mail and email ltr to AK re RPD.	0.3	
12/20/2017	FFV	(Billing Judgment) Rename and save to the DMS client's doc.	0.0	0.1
12/20/2017	FFV	Save filed pleadings.	0.2	
12/20/2017	HNW	Complaint report analysis of complaint types, severity, trends.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/21/2017	GCG	Prepare for and conduct call w/ GW, AKS and MJ re Rule 15 and 26; client files and lack of accessibility at Brookdale San Ramon.	0.9	
12/21/2017	GCG	Review and respond to AKS summary of call.	0.2	
12/21/2017	GCG	Research potential expert; emails w/ team re same.	0.2	
12/21/2017	GCG	Review RS pleadings; email co-counsel re same.	0.2	
12/21/2017	GCG	Confs w/ GW and DM re 2d amended complaint; emails to SC re same.	0.3	
12/21/2017	DWM	Review opposing and co-counsel emails re meeting to discuss letters.	0.2	
12/21/2017	DWM	Review GCG emails re call with opposing counsel and upcoming tasks.	0.2	
12/21/2017	DWM	Review opposing counsel write-up of call and follow-on emails from GCG and co-counsel.	0.1	
12/21/2017	DWM	Meet w GCG to discuss upcoming deadlines in Brookdale and coordinating them with responsibilities in other cases.	0.2	
12/21/2017	DWM	Review co-counsel response to opposing counsel summary of conference call.	0.1	
12/21/2017	DWM	Review GCG email to counsel re add'l classmember.	0.1	
12/21/2017	FFV	(Billing Judgment) Save client's doc to the DMS - Ralph Schmidt.	0.0	0.3
12/21/2017	HNW	Public records research to find trends/ problematic incidents or facilities.	0.4	
12/22/2017	GCG	Conf w/ DP re new named plaintiff.	0.1	
12/22/2017	GCG	Emails to co-counsel re same.	0.1	
12/22/2017	GCG	Work on Second Amended Complaint.	0.3	
12/22/2017	DWM	Review, update and circulate Brookdale to-do list; and review GCG additions and corrections.	0.3	
12/22/2017	FFV	(Billing Judgment) Rename and save to the DMS client's docs.	0.0	0.4
12/26/2017	HNW	Public records investigation records, trend analysis for facility issues.	3.5	
12/27/2017	GCG	Research and draft SAC.	0.6	
12/27/2017	GCG	Emails to SC and team re same and re SS advocacy.	0.2	
12/27/2017	GCG	Emails to JC re HC file and move to memory care.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/27/2017	GCG	Conf w/ KC re MCJ eviction; emails to DR, SC and team re same.	0.1	
12/27/2017	GCG	Confs w/ DM and CDH re potential clients and SAC draft paragraphs.	0.2	
12/27/2017	CDH	Conf w GCG re add'l allegations for SAC.	0.3	
12/27/2017	CDH	Emails and conf w EG re technical problems involved in review of DSS reports.	0.2	
12/27/2017	DWM	Call with Brookdale resident's family member.	0.2	
12/27/2017	DWM	Left vm for potential plaintiffs.	0.1	
12/27/2017	DWM	Talking with potential plaintiff.	0.2	
12/27/2017	DWM	Discussion w GCG re drafting assignments and add'l plaintiffs.	0.1	
12/27/2017	DWM	Discuss plan for amended complaint w CDH.	0.1	
12/27/2017	DWM	Review GCG and co-counsel emails re amending complaint.	0.1	
12/27/2017	DWM	Review co-counsel letter and follow-up emails re named plaintiffs.	0.2	
12/27/2017	DWM	Research Rutter guide on amendments to complaints.	0.4	
12/27/2017	DWM	Work on motion to amend.	0.2	
12/27/2017	FGL	(Billing Judgment) Email from/to DWM re motion for leave to file second amended complaint and create/format shells re same.	0.0	0.2
12/27/2017	HNW	Public records research project.	1.3	
12/28/2017	GCG	Conf w/ and emails to DM re new plaintiffs, background and retention.	0.1	
12/28/2017	GCG	Email to CDH re class member interview.	0.1	
12/28/2017	GCG	Review client documents; emails to SC and team re same and re SAC.	0.2	
12/28/2017	GCG	Email to DR re complaint to licensing.	0.1	
12/28/2017	CDH	Conf w HW re DSS report review.	0.2	
12/28/2017	CDH	Phone conf w potential class member (son of Fountaingrove resident).	0.3	
12/28/2017	CDH	Draft memo re call from potential class member.	0.6	
12/28/2017	DWM	Discussion w GCG re prioritization of tasks for amending complaint.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/28/2017	DWM	Review motion to amend complaint requirements and examples; work on drafting motion, proposed order, and declaration in support.	0.8	
12/28/2017	DWM	Review email from potential client and draft response.	0.2	
12/28/2017	DWM	Call w client and discussion w GCG re results of call.	0.2	
12/28/2017	DWM	Review GCG and co-counsel emails re named plaintiff and schedule call.	0.1	
12/28/2017	DWM	Review retainer and call w client.	0.1	
12/28/2017	DWM	Research re client and circulate key finding.	0.2	
12/28/2017	DWM	Review docs forwarded by NW and send response to GCG.	0.1	
12/28/2017	DWM	Review notes from meeting w class members; legal research re class member statements and drafting new material for complaint.	0.9	
12/28/2017	DWM	Review CDH and GCG emails re class member.	0.1	
12/28/2017	DWM	Review and respond to GCG email re new client.	0.1	
12/28/2017	DWM	Look up background information and draft and circulate email to defense counsel re records.	0.3	
12/28/2017	DWM	Review and respond to potential client email.	0.1	
12/28/2017	FFV	(Billing Judgment) Rename and save client's doc to the DMS.	0.0	0.1
12/28/2017	FFV	(Billing Judgment) Scan and email page two of the class action agreement to DM.	0.0	0.1
12/29/2017	GCG	Conf w/ potential plaintiffs AL and PL w/ DM; follow up email re same.	0.5	
12/29/2017	GCG	Email to HW and team re research for SAC.	0.2	
12/29/2017	DWM	Draft and send emails to client and potential client.	0.1	
12/29/2017	DWM	Drafting factual allegations for client.	0.1	
12/29/2017	DWM	Discussion w GCG re upcoming call with potential clients.	0.1	
12/29/2017	DWM	Call w potential clients.	0.5	
12/29/2017	DWM	Pre- and post-call discussions w GCG about new clients.	0.2	
12/29/2017	DWM	Review information necessary for retainer agreement; draft and send email to potential clients re retainer agreement and other legal question.	0.5	
12/29/2017	DWM	Drafting memo/complaint paragraphs re new client.	1.5	
12/29/2017	HNW	Compile and Analyze DSS reports re Brookdale.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/31/2017	CDH	(Billing Judgment) emails re cancelling trip to Ontario to meet with potential named plaintiff.	0.0	0.2
12/31/2017	CDH	(Billing Judgment) cancel flight reservation for Ontario.	0.0	0.2
1/1/2018	GCG	Review named plaintiff personal services contract; email SC and team re same.	0.2	
1/2/2018	CDH	(Billing Judgment) emails w LW.	0.0	0.3
1/2/2018	CDH	Review HW summary of notable DSS reports.	1.1	
1/2/2018	DWM	Review client information and prepare retainer agreement.	0.1	
1/2/2018	DWM	Review GCG and client emails re updates for named plaintiff.	0.1	
1/2/2018	DWM	Review and analyze potential client power of attorney; write to client with analysis.	0.5	
1/2/2018	DWM	Review paralegal analysis re Brookdale DSS complaints.	0.1	
1/2/2018	DWM	Review and edit retainer.	0.3	
1/2/2018	DWM	Send retainer and add'l email to potential client.	0.1	
1/2/2018	DWM	(Billing Judgment) Draft email requesting add'l edits to retainer.	0.0	0.1
1/2/2018	DWM	(Billing Judgment) Review and edit retainer agreement and ask FGL to place updated pages into document.	0.0	0.2
1/2/2018	DWM	Drafting and sending email to potential client.	0.2	
1/2/2018	DWM	Review and revise memo re client.	0.4	
1/2/2018	DWM	(Billing Judgment) Discussion w KES re photos; transfer phots to KES, adding notes to key photos; send KES memos to add photos.	0.0	0.2
1/2/2018	DWM	Draft and send email to client w request to gather certain documents and schedule call.	0.1	
1/2/2018	KES	(Billing Judgment) Update electronic client documents files.	0.0	0.2
1/2/2018	FGL	(Billing Judgment) Email from/to and confer with DM re edits to Lindstrom retainer and edit/format same.	0.0	0.3
1/2/2018	FGL	(Billing Judgment) Email from/to DM re retainer letter to P. Lindstrom and edit/format same, including exhibits (.3); finalize same for DM to send to client (.1).	0.0	0.4
1/2/2018	HNW	Research and prepare Brookdale licensing report analysis, updated team.	1.7	
1/3/2018	GCG	Conf w/ SG re Fountaingrove issues.	0.2	
1/3/2018	GCG	Conf w/ DD re potential expert witness.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 95

SERVICES

Date	Person	Description of Services	Hours	Discount
1/3/2018	GCG	Emails to DM re client retention.	0.2	
1/3/2018	DWM	Review and respond to prospective client email.	0.1	
1/3/2018	DWM	Set up time to call client.	0.1	
1/3/2018	DWM	Review GCG emails re new clients; internet research on new clients; request KES assistance to do more research.	0.1	
1/3/2018	DWM	Client call.	1.0	
1/3/2018	DWM	Discuss new plaintiffs w CDH.	0.1	
1/3/2018	DWM	(Billing Judgment) Request assistance properly storing documents from KES.	0.0	0.1
1/3/2018	DWM	(Billing Judgment) Coordinating proper filing of retainer page w support staff.	0.0	0.1
1/3/2018	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.1
1/3/2018	KES	Online research re new potential clients.	0.2	
1/3/2018	KES	Update and review client documents files.	0.3	
1/4/2018	GCG	Conf w/ DM and CDH re drafting second amended complaint, motion to amend, and defendants' failure to produce files.	0.4	
1/4/2018	GCG	Emails to KK and team re SAC and discovery.	0.1	
1/4/2018	GCG	Emails to SG re Family Council.	0.1	
1/4/2018	GCG	(Billing Judgment) Email to KES re document storage and review.	0.0	0.1
1/4/2018	CDH	Draft additional allegations based on DSS report review.	1.2	
1/4/2018	CDH	Emails re additional allegations for SAC.	0.2	
1/4/2018	CDH	Legal research re private right of action to enforce RCFE Resident's Bill of Rights.	0.5	
1/4/2018	CDH	Research re ADA regs.	0.2	
1/4/2018	CDH	Research re motion for leave to amend.	0.8	
1/4/2018	CDH	Team mtg re amending complaint.	0.4	
1/4/2018	DWM	Researched named plaintiffs and send email re same to KES and GCG.	0.3	
1/4/2018	DWM	Review HW update re licensing complaint project.	0.1	
1/4/2018	DWM	Review emails re docs and clients from GCG and vm from CDH.	0.1	
1/4/2018	DWM	(Billing Judgment) Discuss new potential division of projects w CDH.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 96

SERVICES

Date	Person	Description of Services	Hours	Discount
1/4/2018	DWM	Meeting w GCG and CDH to discuss tasks related to amending complaint.	0.4	
1/4/2018	DWM	Review and respond to CDH email w research notes re DOT and ADA regs.	0.1	
1/4/2018	DWM	Drafting and revising allegations re client.	1.8	
1/4/2018	DWM	Review CDH research re Resident's Bill of Rights.	0.1	
1/4/2018	KES	(Billing Judgment) Update electronic client document and research files.	0.0	0.5
1/4/2018	HNW	Research of DSS records, compiled relevant documents.	1.2	
1/5/2018	CDH	Conf w DWM re Brookdale tasks.	0.2	
1/5/2018	CDH	Conf w DWM re allegations for Scotts Valley residents.	0.1	
1/5/2018	CDH	Draft allegations re Lytle/Boris.	1.9	
1/5/2018	CDH	Draft motion for leave to amend.	1.1	
1/5/2018	CDH	Legal research re motion for leave to amend.	0.8	
1/5/2018	CDH	Review and edit draft allegations re Bernie J-H.	0.6	
1/5/2018	CDH	(Billing Judgment) review to do list.	0.0	0.1
1/5/2018	CDH	Research re motions for leave to amend.	0.6	
1/5/2018	DWM	Revise add'l complaint paras. for new pl. and circulate to CDH.	0.4	
1/5/2018	DWM	Review transportation wheelchair regs.	0.1	
1/5/2018	DWM	Discussion w CDH re Mot. to Amend and new compl. additions.	0.1	
1/5/2018	DWM	Review CDH comments on compl. paras. implement proposed changes and draft email circulating paragraphs to co-counsel.	0.6	
1/5/2018	DWM	Phone call w client + update CDH on what learned in call.	0.2	
1/5/2018	DWM	Update list of tasks for case.	0.4	
1/5/2018	DWM	Discuss w KES status of plaintiff retainer agreement.	0.1	
1/5/2018	DWM	Discuss arb. opt out issues w CDH.	0.1	
1/5/2018	DWM	Correspond w CDH re client documents.	0.1	
1/5/2018	DWM	Call family member of brookdale resident in response to intake form; draft notes and circulate.	0.4	
1/5/2018	KES	(Billing Judgment) Update retainer agreement and send executed copy to client.	0.0	0.4

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/6/2018	GCG	Email to AKS re client file production.	0.1	
1/6/2018	DWM	Review defense counsel and GCG emails.	0.1	
1/8/2018	GCG	Emails to AKS re client file production.	0.2	
1/8/2018	GCG	Confs w/ and emails to DM re client files re: non-named plaintiff requests for files and SAC allegations.	0.2	
1/8/2018	GCG	(Billing Judgment) Conf w/ and emails to KES re file download, OCR and search documents.	0.0	0.2
1/8/2018	CDH	Conf w DWM re allegations for new named plaintiffs.	0.1	
1/8/2018	CDH	Draft allegations for Lytle/Boris.	1.8	
1/8/2018	CDH	Draft MPA ISO motion for leave to amend.	2.3	
1/8/2018	CDH	Legal research re motion for leave to amend.	0.3	
1/8/2018	DWM	Draft email re client records.	0.1	
1/8/2018	DWM	Discuss new plaintiffs' records and allegations w CDH.	0.1	
1/8/2018	DWM	Review GCG email and email from defense counsel and update tasks list.	0.1	
1/8/2018	DWM	Phone call w GCG to discuss records requests.	0.1	
1/8/2018	DWM	Correspond w KES re assistance w records requests.	0.4	
1/8/2018	DWM	Draft emails to clients re records requests; discussion w GCG re same.	0.4	
1/8/2018	DWM	Review and respond to client email.	0.1	
1/8/2018	DWM	(Billing Judgment) Review co-counsel email re other ongoing cases.	0.0	0.1
1/8/2018	DWM	Review KES email and records provided by opposing counsel.	0.1	
1/8/2018	DWM	Review CDH draft of add'l plaintiff allegations and respond with email.	0.3	
1/8/2018	DWM	Correspond w CDH re next steps.	0.2	
1/8/2018	DWM	(Billing Judgment) Review to-do list.	0.0	0.1
1/8/2018	DWM	(Billing Judgment) Discuss drafting style re add'l pls and doc requests w GCG.	0.0	0.1
1/8/2018	DWM	Review notes from client meetings; begin to draft paragraphs re client.	0.4	
1/8/2018	DWM	Phone call w client and drafting notes from call.	0.8	
1/8/2018	DWM	Discuss records request project updates w/ KES.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/8/2018	FFV	(Billing Judgment) Scan, named and save client's docs to the DMS.	0.0	0.2
1/8/2018	KES	(Reduced Charge) Review and organize client files produced by defendants and upload to electronic files.	1.0	1.0
1/8/2018	KES	Draft client records requests.	0.7	
1/9/2018	GCG	Conf w/ DM re SAC.	0.1	
1/9/2018	GCG	Emails to DM re client records review.	0.1	
1/9/2018	GCG	Conf w/ CDH re SAC and motion to amend.	0.1	
1/9/2018	CDH	Conf w DWM re new allegations, motion for leave to amend.	0.4	
1/9/2018	CDH	Legal research re motion for leave to amend.	1.4	
1/9/2018	CDH	Review and edit revised version of Lytle/Boris allegations.	1.2	
1/9/2018	CDH	Conf w/ GCG re motion to amend.	0.1	
1/9/2018	DWM	Respond to GCG email re new plaintiff and provide compaint paras. and retainer.	0.1	
1/9/2018	DWM	Prepare and send letters to clients.	0.6	
1/9/2018	DWM	(Reduced Charge) Discussion w CDH re phone call w plaintiff, amending compl., and updating allegations.	0.4	0.3
1/9/2018	DWM	Review client email response and email CDH re same.	0.1	
1/9/2018	DWM	Revise plaintiff allegations and draft email to CDH re same.	0.9	
1/9/2018	DWM	Review email from and client letter drafted by KES as well as docs collected by KES.	0.1	
1/9/2018	DWM	Provided update to GCG re potential issue.	0.1	
1/9/2018	DWM	Review signed client letter, save and circulate.	0.1	
1/9/2018	DWM	Review KES email re new docs and draft response.	0.1	
1/9/2018	DWM	Draft email to client and send letter for client to sign.	0.1	
1/9/2018	DWM	(Billing Judgment) Discuss new allegations w CDH.	0.0	0.1
1/9/2018	DWM	Review doc. request letter and attachments; draft and send email with letter and attachments to defense counsel.	0.2	
1/9/2018	DWM	Draft and send email to client.	0.3	
1/9/2018	DWM	Draft complaint allegations re new client.	1.6	
1/9/2018	DWM	(Billing Judgment) Discussion w CDH re statute in compl.	0.0	0.1
1/9/2018	DWM	Review and provide feedback on CDH draft allegations.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/9/2018	KES	Draft records release for client and gather supporting docs for records requests.	0.6	
1/9/2018	KES	Online records research.	0.3	
1/9/2018	KES	Review client files for key documents.	2.3	
1/10/2018	GCG	Confs w/ and emails to DM and CDH re drafting SAC and client communications.	0.3	
1/10/2018	GCG	Email to SC and team re same and re setting up a call.	0.1	
1/10/2018	CDH	Circulate Lytle/Boris allegations to co-counsel w memo re same.	0.6	
1/10/2018	CDH	Conf w DWM re novation issue.	0.2	
1/10/2018	CDH	Legal research re novation.	1.5	
1/10/2018	CDH	Review and comment on draft allegations re Lindstroms.	0.2	
1/10/2018	CDH	Review client files.	0.3	
1/10/2018	CDH	Draft memo re novation.	0.9	
1/10/2018	DWM	Review and respond to client email.	0.1	
1/10/2018	DWM	Review record request materials and prepare and send email to defense counsel.	0.2	
1/10/2018	DWM	Review and respond to client email.	0.1	
1/10/2018	DWM	Discuss with GCG and CDH current events in case and need for meeting with co-counsel.	0.2	
1/10/2018	DWM	(Billing Judgment) Review CDH email re outstanding issues to discuss w co-counsel.	0.0	0.1
1/10/2018	DWM	Review client allegations and call w client.	0.4	
1/10/2018	DWM	Send new complaint paragraphs to CDH and discuss legal issues with him.	0.2	
1/10/2018	DWM	Review CDH comments on allegations and documents.	0.1	
1/10/2018	DWM	(Billing Judgment) Assist CDH to access case filings.	0.0	0.1
1/10/2018	DWM	(Billing Judgment) Review emails scheduling conference call.	0.0	0.1
1/10/2018	DWM	Review plaintiff vm.	0.1	
1/10/2018	DWM	Check in w GCG re progress on ongoing, time-sensitive tasks.	0.1	
1/10/2018	FFV	Draft ltr to client re documents.	0.4	
1/10/2018	KES	Review newly-produced client files and email to team re same.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 100

SERVICES

Date	Person	Description of Services	Hours	Discount
1/11/2018	GCG	Conf w/ and email to DM re client outreach and files.	0.1	
1/11/2018	CDH	Legal research re novation.	1.3	
1/11/2018	CDH	Draft memo re novation.	3.7	
1/11/2018	DWM	Review mail from clients.	0.2	
1/11/2018	DWM	Draft email to client.	0.1	
1/11/2018	DWM	(Billing Judgment) Review and respond to client email.	0.0	0.1
1/11/2018	DWM	(Billing Judgment) Review CDH memo.	0.0	0.3
1/11/2018	DWM	Discuss updates on plaintiffs w GCG.	0.1	
1/11/2018	DWM	Review information on Ralph Schmidt and begin drafting allegations.	0.6	
1/11/2018	DWM	Review voicemail and propose follow-up plan to GCG.	0.1	
1/11/2018	KES	Review of additional client documents.	0.1	
1/12/2018	GCG	Conf w/ GW, SC, DM and CDH re arbitration motion and drafting SAC.	0.3	
1/12/2018	GCG	(Billing Judgment) Confs w/ and emails to DM re client files and retention.	0.0	0.1
1/12/2018	GCG	Email to AKS and KES re file download.	0.0	0.1
1/12/2018	CDH	(Reduced Charge) call w co-counsel; conf w GCG and DWM re same.	0.3	0.1
1/12/2018	CDH	Draft ltr to opposing counsel re Carlson agmt.	0.3	
1/12/2018	CDH	Phone call from son of Fountaingrove resident.	0.4	
1/12/2018	DWM	Review emails from client.	0.1	
1/12/2018	DWM	(Billing Judgment) listen to vm and leave vm in response to cold call.	0.0	0.1
1/12/2018	DWM	(Billing Judgment) Review co-counsel, GCG, CDH, and FFV emails.	0.0	0.1
1/12/2018	DWM	(Reduced Charge) Participate in conference call w co-counsel, CDH, and GCG.	0.3	0.2
1/12/2018	DWM	Email records request to defense counsel.	0.1	
1/12/2018	DWM	Participate in call from individual concerned w Brookdale.	0.3	
1/12/2018	DWM	Draft and circulate email re notes of call with potential witness.	0.2	
1/12/2018	DWM	(Billing Judgment) Work w KES to download and store files produced by defense counsel.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
1/12/2018	DWM	Review memos re plaintiff and continue drafting allegations.	0.5	
1/12/2018	FFV	(Billing Judgment) Put together a fully executed version of the retainer agreement for Lindstrom; mail a copy for client.	0.0	1.0
1/12/2018	KES	Review client files provided by O'Melveny and confer DVM re same.	0.8	
1/15/2018	GCG	Revise letter to AKS re HC arb. agreeent; email to co-counsel re same.	0.1	
1/15/2018	GCG	Review and analyze CDH memorandum re HC agreement and implications for motion to compel.	0.2	
1/15/2018	DWM	Review GCG and co-counsel emails.	0.1	
1/16/2018	CDH	Teleconf w potential class member; emails w GCG and DWM re same.	0.1	
1/16/2018	CDH	Review and edit allegations for SAC re Ralph Schmidt.	0.2	
1/16/2018	DWM	(Billing Judgment) Review emails from KES, GCG, and reception.	0.0	0.1
1/16/2018	DWM	Left vm in response to potential class member call.	0.1	
1/16/2018	DWM	Listen to vm; have call w class member; write up notes; circulate to KES, GCG, and CDH.	0.6	
1/16/2018	DWM	Draft allegations re new plaintiff.	2.3	
1/16/2018	DWM	Drafting and sending emails to clients.	0.2	
1/16/2018	DWM	Discuss allegations w CDH.	0.1	
1/16/2018	DWM	Review writen CDH comments on new Pl. allegations.	0.1	
1/16/2018	DWM	Email client to schedule time to chat.	0.1	
1/16/2018	KES	Review client files provided by defendants.	1.8	
1/16/2018	KES	Review email re call from relative of Brookdale resident.	0.1	
1/17/2018	GCG	Revise and send letter to AKS re JC refusal to consent to arbitration.	0.1	
1/17/2018	GCG	Emails to KES, DM, CDH re same and re client outreach.	0.1	
1/17/2018	GCG	Conf w/ SC re discovery requests and letter to AKS.	0.1	
1/17/2018	GCG	Research re abstention.	0.1	
1/17/2018	CDH	Review 9th Cir opn potentially relevant to Defs' abstention argument; conf w GCG re same.	0.4	
1/17/2018	DWM	Review GCG and CDH emails and letter to opposing counsel.	0.1	
1/17/2018	DWM	Correspond w client to schedule conference call.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/17/2018	DWM	(Billing Judgment) Review GCG and CDH emails discussing new 9th Cir. opinion.	0.0	0.1
1/17/2018	DWM	(Billing Judgment) Input notes from class member interviews and one call into contact tracker.	0.0	1.1
1/17/2018	DWM	Receive call from class member; discuss w CDH.	0.2	
1/17/2018	DWM	Review fax from class member and follow up.	0.1	
1/17/2018	KES	Finalize and send electronic and hard copy of letter to opposing counsel.	0.5	
1/17/2018	KES	Review new client document.	0.1	
1/17/2018	FGL	(Billing Judgment) Confer with GCG re edits to letter to A. KohSweeney and edit same.	0.0	0.1
1/18/2018	GCG	Conf w/ DM re client outreach and SAC allegations.	0.1	
1/18/2018	DWM	Correspond w client re meeting time.	0.1	
1/18/2018	DWM	Two phone calls w client.	0.8	
1/18/2018	DWM	Review new client docs.	0.2	
1/18/2018	DWM	Provide update and ask question re plaintiff to GCG.	0.1	
1/18/2018	DWM	Revise new plaintiff allegations and circulate to CDH, GCG, and co-counsel; correspond separately w CDH about circulation.	1.9	
1/18/2018	DWM	Draft and send follow-up email to client.	0.1	
1/18/2018	DWM	Discuss client docs w KES.	0.3	
1/18/2018	DWM	Correspond w CDH re new pl allegations.	0.1	
1/18/2018	DWM	Review records request letter; email client; request documents.	0.1	
1/18/2018	DWM	Review plaintiff documents, compare to drafted allegations, and circulate thoughts to CDH and GCG.	0.5	
1/18/2018	DWM	Review client record and leave client vm.	0.1	
1/18/2018	DWM	Review docs; update team w findings.	0.3	
1/18/2018	KES	Update electronic client documents files; confer DWM re same.	0.3	
1/19/2018	GCG	Conf w/ DM, CDH and KES re review of client files and drafting of SAC and motion to amend.	0.6	
1/19/2018	GCG	Review Barker letter re Carlson opt out.	0.1	
1/19/2018	GCG	Emails to GW and team re same and re motions to compel and amend.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/19/2018	CDH	Team mtg re SAC and motion to amend.	0.6	
1/19/2018	CDH	Emails re new Carlson agmt.	0.2	
1/19/2018	CDH	Phone call from potential class member.	0.4	
1/19/2018	CDH	(Reduced Charge) draft memo re call from potential class member.	0.3	0.3
1/19/2018	CDH	Review docs from potential class member.	0.2	
1/19/2018	DWM	Review GCG and co-counsel emails.	0.2	
1/19/2018	DWM	Review CDH email and memo.	0.1	
1/19/2018	DWM	Discuss class member contact and pl files w CDH.	0.1	
1/19/2018	DWM	Correspond w client.	0.1	
1/19/2018	DWM	Weekly team meeting re SAC and motion to amend.	0.6	
1/19/2018	DWM	Draft email to co-counsel re pls' docs.	0.2	
1/19/2018	DWM	Recirculate new pl allegations.	0.1	
1/19/2018	DWM	Review and respond to co-counsel email re plaintiff records.	0.1	
1/19/2018	DWM	(Billing Judgment) Update individual and case team to-do lists; circulate case team to-do list.	0.0	0.4
1/19/2018	DWM	(Billing Judgment) Draft email to client re third-party contact info.	0.0	0.1
1/19/2018	DWM	Review letter from defense counsel; and responsive emails from GCG and co-counsel.	0.3	
1/19/2018	DWM	Review client files and respond to co-counsel question re status.	0.3	
1/19/2018	KES	Team meeting re case status and tasks.	0.5	
1/19/2018	KES	(Billing Judgment) Update CaseMap with recently received documents.	0.0	0.5
1/19/2018	KES	Update master witness chart with information about potential witness.	0.1	
1/21/2018	GCG	Review emails from AKS re file production, from GW re response to Barker letter and from SC re letter to Barker.	0.2	
1/21/2018	DWM	(Billing Judgment) eview email from Defense counsel re documents.	0.0	0.1
1/22/2018	GCG	Review letters and emails to clients re SAC.	0.4	
1/22/2018	GCG	Conf w/ and emails to DM re same and re retainer agreements.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/22/2018	CDH	Legal research re novation.	1.7	
1/22/2018	CDH	Update plaintiff tracking chart.	0.4	
1/22/2018	CDH	Phone calls with potential declarant; sister of potential declarant.	0.9	
1/22/2018	CDH	Conf w DWM re pending tasks.	0.3	
1/22/2018	CDH	Draft ltr to potential declarant.	0.2	
1/22/2018	DWM	Review and respond to client email.	0.1	
1/22/2018	DWM	Review GCG and co-counsel emails; respond to GCG email.	0.1	
1/22/2018	DWM	Discuss status of correspondence w pls and defense counsel with GCG.	0.3	
1/22/2018	DWM	(Reduced charge) Review and update pl record retention letter.	0.3	0.2
1/22/2018	DWM	(Billing Judgment) Discuss w FFV process for sharing FedEx acct. no. w clients; prepare email w information necessary for FFV to complete mailing.	0.0	0.1
1/22/2018	DWM	Preparation for call w client's related party; have call; draft follow-up email and memo re call.	0.3	
1/22/2018	DWM	Review CDH notes re declarant.	0.1	
1/22/2018	DWM	Revise letters to clients.	0.2	
1/22/2018	DWM	(Billing Judgment) Correspond w client to move appointment.	0.0	0.1
1/22/2018	DWM	Email pls re docs to expect in mail.	0.4	
1/22/2018	DWM	(Billing Judgment) Review and forward client emails; discuss technical questions raised w KES and ICS; draft and send response to client.	0.0	0.3
1/22/2018	DWM	(Billing Judgment) Review email attachment test and correspond w client about docs to be sent.	0.0	0.1
1/22/2018	DWM	Discuss client contact and pending projects w GCG.	0.1	
1/22/2018	DWM	(Billing Judgment) Review GCG emails and request filing assistance from KES.	0.0	0.1
1/22/2018	FFV	(Billing Judgment) Prepare fedex labels for clients' docs.	0.0	0.5
1/22/2018	KES	Send copies of FAC to potential clients.	0.4	
1/22/2018	KES	Confer DWM re client emails.	0.2	
1/22/2018	KES	Investigate options for obtaining client emails from client.	1.0	
1/23/2018	GCG	Revise letter to JB re arbitration agreement; confs w/ DM and CDH re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/23/2018	GCG	Email to co-counsel re same.	0.1	
1/23/2018	GCG	Conf w/ DM re client outreach and SAC allegations.	0.1	
1/23/2018	GCG	Email to DR re named plaintiff.	0.1	
1/23/2018	GCG	Email to KES re document review.	0.1	
1/23/2018	CDH	Draft ltr to opposing counsel re Carlson residency agmt.	1.8	
1/23/2018	CDH	Conf w DWM re ltr to opposing counsel re Carlson residency agmt.	0.2	
1/23/2018	DWM	Review retainer agreements and draft email to client; draft email to KES re docs.	0.1	
1/23/2018	DWM	Review retainer email from client; send response.	0.2	
1/23/2018	DWM	Review email from KES and draft email to client.	0.1	
1/23/2018	DWM	Review CDH letter and provide comments.	0.3	
1/23/2018	DWM	Review email w docs from client; respond to client concerns.	0.2	
1/23/2018	DWM	Phone call w clients.	1.1	
1/23/2018	DWM	(Reduced Charge) Meet w GCG to discuss letter to opposing counsel and client call.	0.1	0.1
1/23/2018	DWM	Revise allegations re new pls.	1.0	
1/23/2018	DWM	(Billing Judgment) Review GCG and CDH emails re letter.	0.0	0.1
1/23/2018	FFV	(Billing Judgment) Prepare fully executed retainer agreement for Fisher; save to the DMS and mail a copy to client.	0.0	0.4
1/23/2018	KES	(Billing Judgment) Update electronic files with client documents and review CaseMap issues for same.	0.0	0.6
1/24/2018	GCG	Review and revise allegations re named plaintiffs for second amended complaint.	0.5	
1/24/2018	GCG	Emails to co-counsel re same.	0.1	
1/24/2018	GCG	Revise and send letter to JB re HC arbitration opt out/residency agreement.	0.5	
1/24/2018	GCG	(Billing Judgment) Emails to KES re document review.	0.0	0.1
1/24/2018	CDH	(Billing Judgment) save novation research to DMS.	0.0	0.2
1/24/2018	CDH	Review and edits to revised Lindstrom allegations; conf w DWM re same.	0.3	
1/24/2018	CDH	(Billing Judgment) citecheck ltr to opposing counsel re Carlson residency agmt.	0.0	0.7

SERVICES

Date	Person	Description of Services	Hours	Discount
1/24/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails and client decl.	0.0	0.1
1/24/2018	DWM	Revise and circulate new pl allegations.	0.7	
1/24/2018	DWM	Discuss client allegations and letter w CDH.	0.1	
1/24/2018	DWM	(Billing Judgment) Review letter by CDH and co-counsel emails.	0.0	0.1
1/24/2018	DWM	Discuss CDH comments re new pl allegations.	0.2	
1/24/2018	DWM	(Billing Judgment) Review GCG and KES emails re documents and GCG letter to defense counsel.	0.0	0.1
1/24/2018	DWM	Review and respond to client emails re docs.	0.1	
1/24/2018	DWM	(Billing Judgment) Discuss doc download issue w KES and download docs.	0.0	0.1
1/24/2018	FFV	(Billing Judgment) Mail and save to the DMS letter to JB re Carlson residency agreement.	0.0	0.1
1/24/2018	KES	Download and review newly produced client files; review documents in CaseMap.	1.2	
1/24/2018	KES	Review emails re client emails with Brookdale and consider issues re how to handle in DMS and CaseMap.	0.6	
1/25/2018	GCG	Email to KES re document review.	0.1	
1/25/2018	GCG	Email to DM and CH re allegations for SAC.	0.1	
1/25/2018	DWM	Review email from client; circulate to KES w question; review KES response.	0.1	
1/25/2018	DWM	Review and search docs flagged by KES and respond to GCG email re docs.	0.2	
1/25/2018	KES	Update electronic files with new client emails.	0.8	
1/26/2018	GCG	Revise SAC; conf w/ DM and CDH re same.	0.3	
1/26/2018	GCG	Conf w/ GW, SC and KK re SAC allegations and timing; discovery.	0.2	
1/26/2018	GCG	Emails to KES and AKS re file production.	0.1	
1/26/2018	CDH	Conf w DWM.	0.2	
1/26/2018	DWM	(Billing Judgment) Leave vm for witness.	0.0	0.1
1/26/2018	DWM	Discuss status of complaint amendments and other projects w CDH.	0.2	
1/26/2018	DWM	Draft and send email to witness.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/26/2018	DWM	Meet w GCG, CDH, and co-counsel to discuss status of case and strategy.	1.0	
1/26/2018	DWM	Review KES's accounting of current documents; circulate to co-counsel and GCG.	0.1	
1/26/2018	DWM	Draft email to client.	0.1	
1/26/2018	KES	Review status of defendant production of client files.	0.2	
1/29/2018	GCG	Conf w/ and email KES re potential class representative.	0.2	
1/29/2018	DWM	(Billing Judgment) Review email from KES re class member phone call.	0.0	0.1
1/29/2018	DWM	Discuss case transition plan w CDH.	0.1	
1/29/2018	KES	Call from potential witness; email and memo to team re same; update master spreadsheet re same.	1.5	
1/30/2018	DWM	Phone call w client.	0.2	
1/31/2018	GCG	Emails to GW and AKS re delayed production of client files.	0.1	
1/31/2018	GCG	Email to DM re client allegations.	0.1	
1/31/2018	GCG	Conf w/ KES re same.	0.1	
1/31/2018	GCG	Email to SC re named plaintiffs.	0.1	
1/31/2018	GCG	Conf w/ DR and email to KC re named plaintiff status.	0.2	
1/31/2018	CDH	Review Edward Boris client files.	0.4	
1/31/2018	CDH	Emails w potential class member.	0.2	
1/31/2018	CDH	Conf w DWM.	0.3	
1/31/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re documents.	0.0	0.1
1/31/2018	DWM	Review and circulate client email.	0.1	
1/31/2018	DWM	(Billing Judgment) Place call to co-counsel; talk to receptionist.	0.0	0.1
1/31/2018	DWM	Review and respond to co-counsel email.	0.1	
1/31/2018	DWM	(Billing Judgment) Review CDH and GCG emails.	0.0	0.1
1/31/2018	DWM	Discuss case strategy a w CDH.	0.3	
1/31/2018	DWM	Review relevant allegations; leave voice mail for witness.	0.2	
1/31/2018	KES	Review status of client record requests.	0.1	
2/1/2018	GCG	Email from CDH re class cert. declarations.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/1/2018	GCG	Conf w/ and email to DM re named plaintiff file review and revised allegations for SAC.	0.2	
2/1/2018	CDH	Review Edward Boris client files.	0.6	
2/1/2018	CDH	Revise Boris/Lytle allegations in light of info from client files.	0.5	
2/1/2018	DWM	Discuss ongoing projects w GCG.	0.1	
2/1/2018	DWM	Review CDH updates to allegations.	0.1	
2/1/2018	DWM	Review status of client files; discuss w KES process for downloading and saving particular file.	0.3	
2/1/2018	DWM	Review docs and send email w findings to GCG, CDH, and KES.	0.2	
2/1/2018	DWM	Coordinate declarant call w CDH and review CDH email re declarant.	0.1	
2/1/2018	KES	Upload and prepare recently produced Quinlan file.	0.3	
2/2/2018	GCG	Email w/ GW re SAC.	0.1	
2/2/2018	GCG	Research re assisted living issues; email team re same.	0.1	
2/2/2018	BBK	Conference w/ DWM re: status of case; signing up of new named plaintiffs who opted out of arbitration.	0.1	
2/2/2018	DWM	(Reduced Charge) Discuss status of case w BBK.	0.1	0.1
2/5/2018	GCG	Conf w/ GW and SC re SAC.	0.4	
2/5/2018	GCG	(Reduced Charge) Conf w/ DM re factual research for SAC and motion to amend.	0.1	0.1
2/5/2018	GCG	Email to GW and SC re CLRA notice, letter re SAC and review of SAC.	0.2	
2/5/2018	GCG	Conf w/ KC re MCJ.	0.2	
2/5/2018	GCG	Draft letter to DR and KC re MCJ withdrawal.	0.2	
2/5/2018	GCG	Email w/ DM and HF re RS conservator.	0.1	
2/5/2018	GCG	Email to JC re HC/memory care.	0.1	
2/5/2018	GCG	Email to DM and CDH re motion to amend.	0.1	
2/5/2018	GCG	Conf w/ SG re Fountaingrove.	0.1	
2/5/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re gov't report; review news article about report; find, save, and circulate report.	0.0	0.3
2/5/2018	DWM	Discuss upcoming deadlines in case.	0.1	
2/5/2018	DWM	(Billing Judgment) Leave voicemail for witness.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
2/5/2018	DWM	Draft email to client.	0.2	
2/5/2018	DWM	Review CDH draft motion; draft arguments on either side of relevant issue under consideration.	0.4	
2/5/2018	DWM	Discuss complaint issue w GCG.	0.1	
2/5/2018	DWM	Review GCG, co-counsel, and client emails re complaint; respond to client.	0.2	
2/5/2018	DWM	Review and respond to add'l emails from client, GCG, and co-counsel.	0.1	
2/5/2018	DWM	(Billing Judgment) Review co-counsel email re particular facility.	0.0	0.1
2/5/2018	KES	Review status of documents in CaseMap and consider coding issues.	0.4	
2/6/2018	GCG	Conf w/ and emails to JC re SAC allegations.	0.5	
2/6/2018	GCG	Revise letter to AKS re incident of retaliation.	0.3	
2/6/2018	GCG	Revise SAC.	0.5	
2/6/2018	GCG	Confs w/ GW, CDH and DM re same.	0.5	
2/6/2018	GCG	Emails to SC and team re factual and legal issues raised by motion to amend.	0.2	
2/6/2018	GCG	(Billing Judgment) Revise letter to KC and DR re MCJ role in case.	0.0	0.2
2/6/2018	CDH	Review draft SAC.	1.5	
2/6/2018	CDH	Draft additional changes to SAC.	0.9	
2/6/2018	CDH	Teleconfs w clients re allegations in SAC.	0.8	
2/6/2018	CDH	(Billing Judgment) review recent Cal Ct of Appeal opn re failure to disclose and CLRA/UCL claims.	0.0	0.4
2/6/2018	CDH	Review client communication.	0.2	
2/6/2018	DWM	Discuss plan to reach out to clients w GCG.	0.1	
2/6/2018	DWM	Review and respond to emails re Complaint from GCG, CDH, and co-counsel.	0.1	
2/6/2018	DWM	Discuss procedural hurdle w CDH.	0.1	
2/6/2018	DWM	Discuss new complaint paras w CDH and GCG.	0.2	
2/6/2018	DWM	Draft emails transmitting new paras. to clients; review paras. circulate to clients.	0.5	
2/6/2018	DWM	Review co-counsel email re licensing reports.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/6/2018	DWM	Review defense counsel email.	0.1	
2/6/2018	DWM	Discuss allegation question w CDH and GCG.	0.2	
2/6/2018	DWM	Review prior emails re notice; draft email summarizing thoughts and recommending path forward; review CDH email re allegations.	0.3	
2/6/2018	DWM	Review emails from co-counsel re new allegations.	0.1	
2/6/2018	DWM	Discuss allegations and amendments w CDH.	0.2	
2/6/2018	DWM	Review email re new docs and discuss w KES.	0.1	
2/6/2018	DWM	Review amended complaint; input edits.	1.0	
2/6/2018	DWM	Discuss new allegations w client.	0.6	
2/6/2018	DWM	Conduct interview w witness.	0.8	
2/6/2018	DWM	(Billing Judgment) Discuss witness call w CDH.	0.0	0.1
2/6/2018	DWM	(Billing Judgment) review co-counsel emails re client.	0.0	0.1
2/6/2018	DWM	Review client docs produced by opposing counsel re same.	0.4	
2/6/2018	DWM	Discuss client-specific allegation questions w CDH and co-counsel.	0.2	
2/6/2018	DWM	(Billing Judgment) Draft email to co-counsel re call w witness.	0.0	0.2
2/6/2018	DWM	(Billing Judgment) Discuss new amendments and workflow for remained of week w CDH.	0.0	0.1
2/6/2018	DWM	(Billing Judgment) Review co-counsel and client emails re allegations.	0.0	0.1
2/6/2018	DWM	Revise allegations re client.	1.1	
2/6/2018	DWM	Discuss next steps re complaint w GCG.	0.1	
2/6/2018	DWM	(Billing Judgment) Create memo to document conversation w witness.	0.0	0.1
2/6/2018	DWM	(Billing Judgment) Review KES, CDH and co-counsel emails re amended complaint and new docs.	0.0	0.2
2/6/2018	FFV	Create new version of ltr re dismissal.	0.2	
2/6/2018	FFV	(Billing Judgment) Rename and save to the DMS emailed letter.	0.0	0.1
2/6/2018	KES	Download and review newly produced client files.	1.1	
2/7/2018	GCG	Review letter re motion to amend.	0.1	
2/7/2018	GCG	Emails to GW, CDH and DM re fact checking draft SAC.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2018	GCG	Emails to DM and clients re documents and allegations.	0.1	
2/7/2018	CDH	Legal research re motion for leave to amend.	0.6	
2/7/2018	CDH	Draft motion for leave to amend.	2.8	
2/7/2018	CDH	Conf w DWM.	0.2	
2/7/2018	CDH	Calls w class members re allegations in SAC; conf w DWM re same.	1.2	
2/7/2018	DWM	Correspond w client re speicific incidents at facility.	0.1	
2/7/2018	DWM	(Billing Judgment) Update pleadings per information from client; draft email circulating to GCG, CDH, and co-counsel.	0.0	0.2
2/7/2018	DWM	Telephone conversation w client.	0.1	
2/7/2018	DWM	(Billing Judgment) Review co-counsel emails and file new drafts in appropriate folders.	0.0	0.1
2/7/2018	DWM	(Billing Judgment) Review CDH and co-counsel emails re remaining tasks to amend compl.	0.0	0.1
2/7/2018	DWM	(Billing Judgment) Discuss document processing w CDH and KES.	0.0	0.1
2/7/2018	DWM	Review documents produced by defs; draft email to co-counsel, CDH and GCG w findings.	0.7	
2/7/2018	DWM	Correspond w CDH re call to client.	0.1	
2/7/2018	DWM	(Billing Judgment) Draft email to client.	0.0	0.1
2/7/2018	DWM	Review and respond to client email.	0.1	
2/7/2018	KES	(Reduced Charge) Review new original client documents.	0.6	0.3
2/8/2018	GCG	Emails to SC and team re further revisions to SAC and client allegations.	0.3	
2/8/2018	GCG	Conf w/ SG re Fountaingrove family council.	0.3	
2/8/2018	GCG	Email to SC and team re further discovery and H&S requirements.	0.1	
2/8/2018	GCG	Conf w/ CDH and DM re motion to amend and SAC allegations.	0.3	
2/8/2018	GCG	Emails to DM and team re client revisions to SAC.	0.2	
2/8/2018	GCG	Finalize and send termination letter to KC and DR.	0.2	
2/8/2018	CDH	(Billing Judgment) conf w AGS re amendment v supplementation of compl.	0.0	0.2
2/8/2018	CDH	Conf w GCG and DWM.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/8/2018	CDH	Draft Grunfeld decl ISO motion for leave to amend.	1.0	
2/8/2018	CDH	Draft motion for leave to amend.	1.0	
2/8/2018	CDH	Further edits to SAC.	0.5	
2/8/2018	DWM	Review and respond to client emails.	0.1	
2/8/2018	DWM	(Billing Judgment) Discuss process for updating client allegations over next two days.	0.0	0.1
2/8/2018	DWM	Review and respond to CDH and co-counsel emails.	0.1	
2/8/2018	DWM	Review and respond to co-counsel emails re allegations and client docs.	0.2	
2/8/2018	DWM	(Billing Judgment) Review GCG, CDH, and co-counsel emails re departing class reps and new allegations.	0.0	0.1
2/8/2018	DWM	(Billing Judgment) Schedule time to meet w GCG.	0.0	0.1
2/8/2018	DWM	Review and respond to client email and circulate to co-counsel.	0.1	
2/8/2018	DWM	Review newly provided client docs.	0.2	
2/8/2018	DWM	Meet w GCG and CDH re motion to amend.	0.3	
2/8/2018	DWM	Review client email; amend complaint; and send to co-counsel, CDH and GCG.	0.1	
2/8/2018	DWM	(Billing Judgment) Discuss declaration w CDH.	0.0	0.1
2/8/2018	FFV	(Billing Judgment) Mail ltr to KC and DR re termination of representation.	0.0	0.2
2/8/2018	KES	Review client documents and update electronic files re same.	0.8	
2/9/2018	GCG	Emails to SC and team re revisions to SAC.	0.2	
2/9/2018	GCG	Email to GW and AKS re revised SAC.	0.1	
2/9/2018	GCG	Email to CDH re motion to amend.	0.1	
2/9/2018	GCG	Review letter from JB re incident w/ SC.	0.1	
2/9/2018	DWM	(Billing Judgment) Review GCG and CDH emails re mot. to amend.	0.0	0.1
2/9/2018	DWM	Review and respond to emails re physical access barriers.	0.1	
2/9/2018	DWM	Review email from co-counsel and updated complaint.	0.1	
2/9/2018	DWM	Review letter from defense counsel.	0.1	
2/9/2018	FFV	(Billing Judgment) Rename and save ltr to Colby in the DMS.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
2/9/2018	KES	Review newly received client documents and arrange for scanning.	0.2	
2/9/2018	HNW	(Billing Judgment) saved relevant documents to DMS.	0.0	0.3
2/11/2018	GCG	Review and revise brief in support of motion to amend.	0.4	
2/11/2018	GCG	Email to CDH re same.	0.1	
2/11/2018	GCG	Emails from SG re Family council.	0.1	
2/12/2018	GCG	Review and analyze JB's letter re request to stipulate to SAC.	0.2	
2/12/2018	GCG	Emails to GW and CDH re same.	0.2	
2/12/2018	GCG	Research and revise Grunfeld Reply declaration ISO Rule 15 motion.	0.3	
2/12/2018	GCG	Emails to DM and team re same.	0.1	
2/12/2018	GCG	Emails to SG and DM re factual issues.	0.1	
2/12/2018	CDH	Draft motion for leave to amend.	3.8	
2/12/2018	CDH	Edit motion for leave to amend.	1.5	
2/12/2018	CDH	(Billing Judgment) review and edit to do list.	0.0	0.2
2/12/2018	CDH	(Reduced Charge) conf w DWM.	0.3	0.2
2/12/2018	CDH	(Billing Judgment) conf w GCG.	0.0	0.2
2/12/2018	CDH	Emails w co-counsel re motion for leave to amend.	0.2	
2/12/2018	CDH	Add'l legal research re motion for leave to amend.	0.7	
2/12/2018	DWM	Discuss upcoming tasks and converstions w co-counsel w CDH.	0.3	
2/12/2018	DWM	(Billing Judgment) Update case to-do checklist.	0.0	0.3
2/12/2018	DWM	Review and respond to co-counsel emails.	0.3	
2/12/2018	DWM	(Billing Judgment) leave vm for co-counsel.	0.0	0.1
2/12/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re deadline for comp. and discussion w defense counsel.	0.0	0.1
2/12/2018	DWM	Review discovery request prepared by co-counsel; edit and add add'l requests; circulate to CDH and GCG w comments.	1.2	
2/12/2018	DWM	Disucss mot. to amend and other issues.	0.2	
2/12/2018	DWM	Call w potential declarant; draft notes; and send email updating CDH.	0.4	
2/12/2018	DWM	Review and respond to GCG email re research.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/12/2018	DWM	(Billing Judgment) Review letter from defense counsel.	0.0	0.1
2/12/2018	DWM	(Billing Judgment) Review CDH and co-counsel emails.	0.0	0.1
2/12/2018	KES	(Billing Judgment) Update electronic client documents files.	0.0	0.6
2/13/2018	GCG	Confs w/ DM and emails to CDH re revisions to Grunfeld decl and brief.	0.2	
2/13/2018	GCG	Review GW comments on brief.	0.2	
2/13/2018	CDH	Add'l legal research for motion for leave to amend.	1.2	
2/13/2018	CDH	Revise motion for leave to amend.	1.8	
2/13/2018	DWM	(Billing Judgment) Discuss remaining steps re mot. to amend w CDH.	0.0	0.1
2/13/2018	DWM	(Reduced Charge) Discuss next steps on declaration w GCG.	0.1	0.1
2/13/2018	DWM	(Billing Judgment) Discuss current version of motion and declaration w CDH.	0.0	0.1
2/13/2018	DWM	Conduct phone call with potential declarant and draft notes.	0.5	
2/13/2018	DWM	Review and edit mot. to dismiss, declaration and attachments.	2.3	
2/13/2018	DWM	(Billing Judgment) Discuss declaration and mot to amend w GCG, CDH, and FGL.	0.0	0.2
2/13/2018	FFV	(Billing Judgment) Print and save exhibits to the DMS.	0.0	0.3
2/13/2018	FGL	Revise Grunfeld Declaration iso motion for leave to file SAC (.4); confer with DWM re same (.1).	0.5	
2/14/2018	GCG	Research and revise Grunfeld declaration.	1.0	
2/14/2018	GCG	Email GW re defendants' insurance policies.	0.1	
2/14/2018	GCG	Research and revise MPAs ISO motion to amend.	1.0	
2/14/2018	GCG	Conf w/ and emails to GW, SC, DM and CDH re SAC and motion to amend.	0.5	
2/14/2018	BBK	Comm'ns w/ DWM re: case status and motion for leave to file Second Amended Complaint adding and subtracting plaintiffs.	0.1	
2/14/2018	CDH	Teleconf w co-counsel re changes to SAC; conf w GCG and DWM re same.	0.5	
2/14/2018	CDH	(Billing Judgment) teleconf w Sarah Colby re redline of SAC.	0.0	0.2
2/14/2018	CDH	Review sample proposed orders.	0.2	
2/14/2018	CDH	Review final edits to SAC.	0.3	
2/14/2018	CDH	Research local rules re notice of motion.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/14/2018	CDH	Review and edit motion for leave to amend.	1.2	
2/14/2018	DWM	(Billing Judgment) Review co-counsel emails and co-counsel changes to complaint.	0.0	0.2
2/14/2018	DWM	(Billing Judgment) Discuss time for call we GCG and review emails scheduling call.	0.0	0.1
2/14/2018	DWM	(Billing Judgment) Update case to do list.	0.0	0.1
2/14/2018	DWM	Meet w GCG, CDH, and co-counsel re add'l edits to amended complaint.	0.4	
2/14/2018	DWM	(Billing Judgment) Review CDH and GCG emails re updates on complaint.	0.0	0.1
2/14/2018	DWM	(Billing Judgment) discuss client file management w KES.	0.0	0.1
2/14/2018	DWM	Review and revise declaration.	0.4	
2/14/2018	DWM	(Billing Judgment) Discuss filing tasks and draft order w CDH.	0.0	0.1
2/14/2018	DWM	Discuss document updates w GCG.	0.1	
2/14/2018	DWM	Draft, revise and circulate draft proposed order.	0.5	
2/14/2018	DWM	(Billing Judgment) Discuss status of documents.	0.0	0.1
2/14/2018	DWM	Research voluntary dismissal and draft email explaining findings.	0.4	
2/14/2018	DWM	Review GCG changes to declaration correspond w co-counsel re dismissals.	0.3	
2/14/2018	DWM	Update BBK on case status.	0.1	
2/14/2018	DWM	Circulate docs to co-counsel and update GCG on status of motion.	0.1	
2/14/2018	FFV	(Billing Judgment) Rename and save to the DMS Barker letter.	0.0	0.1
2/14/2018	FFV	(Billing Judgment) Combine three separate docs; save to the DMS.	0.0	0.3
2/14/2018	KES	Update electronic client documents files and upload same to CaseMap.	1.3	
2/14/2018	KES	Review draft declaration and exhibits.	0.9	
2/15/2018	GCG	Conf w/ and emails to CDH and DM re motion to amend.	0.1	
2/15/2018	GCG	Email to KES re same.	0.1	
2/15/2018	CDH	Finalize motion for leave to amend filings.	2.1	
2/15/2018	DWM	(Billing Judgment) Discuss filing plan w CDH.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
2/15/2018	DWM	Review email from witness.	0.1	
2/15/2018	DWM	Cite check case cites in brief.	1.3	
2/15/2018	DWM	(Billing Judgment) Review emails from CDH and KES re process.	0.0	0.1
2/15/2018	DWM	(Billing Judgment) Discuss post-filing (Mot. to Amend) next steps w CDH.	0.0	0.1
2/15/2018	KES	Revise, finalize and file motion for leave to file SAC; email proposed order and send chambers copy re same; update electronic files re same.	3.4	
2/15/2018	KES	Review new witness documents and consider organization of witness materials.	0.3	
2/16/2018	GCG	Conf w/ CDH, DM and KES re class certification declarations and follow up to motion to amend.	0.3	
2/16/2018	CDH	Prep for phone call with witness.	0.5	
2/16/2018	CDH	Phone call with witness.	1.0	
2/16/2018	CDH	Draft decl of witness.	2.9	
2/16/2018	CDH	Team mtg.	0.3	
2/16/2018	DWM	Discuss declarant w CDH.	0.1	
2/16/2018	DWM	Meet w KES, CDH, and GCG re case updates.	0.3	
2/16/2018	DWM	(Billing Judgment) Review new deadlines calendared.	0.0	0.1
2/16/2018	KES	Meeting re case status.	0.3	
2/16/2018	KES	Review local rules re motion to amend, tc to court clerk and confer CH re hearing date.	0.6	
2/16/2018	KES	Calendar motion deadlines.	0.1	
2/18/2018	GCG	Review CDH memo to file re conversation w/ witness/class member.	0.1	
2/18/2018	GCG	(Billing Judgment) Review case issues and to do list.	0.0	0.1
2/19/2018	GCG	Review notes and memoranda.	0.3	
2/19/2018	GCG	Work on class cert declarations; email to DM re next steps.	0.3	
2/20/2018	GCG	Email to courtroom deputy re motion to amend.	0.1	
2/20/2018	GCG	Review court's calendaring order.	0.1	
2/20/2018	GCG	Review pleadings ISO motion.	0.1	
2/20/2018	GCG	Conf w/ and emails to DM and CDH re client documents.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2018	GCG	Conf w/ KS and email to GW re discovery issues.	0.3	
2/20/2018	BBK	Review Motion for Leave to File SAC.	0.2	
2/20/2018	CDH	(Billing Judgment) collect attorney notes and memos for Lupe to file.	0.0	0.3
2/20/2018	DWM	(Billing Judgment) Review GCG emails re news, reports and records.	0.0	0.1
2/20/2018	DWM	Review scheduling order and GCG and CDH emails.	0.1	
2/20/2018	DWM	(Billing Judgment) Review and update list of tasks for case.	0.0	0.4
2/20/2018	DWM	(Billing Judgment) Review CDH emails and have discussion w CDH re case tasks being handed off.	0.0	0.1
2/20/2018	DWM	(Billing Judgment) Review GCG edits to document.	0.0	0.1
2/21/2018	GCG	Revise notices of dismissal; emails with DM and co-counsel re same.	0.2	
2/21/2018	GCG	Emails with SC, DM re document requests.	0.2	
2/21/2018	DWM	(Billing Judgment) Research notices of dismissal.	0.0	0.1
2/21/2018	DWM	Draft filings and review discovery requests; circulate same to CDH and GCG.	0.6	
2/21/2018	DWM	(Billing Judgment) Review updated contact list.	0.0	0.1
2/21/2018	DWM	Discuss draft filings and discovery materials w GCG.	0.1	
2/21/2018	DWM	Review GCG edits to documents and draft email sending same to co-counsel.	0.2	
2/21/2018	DWM	Review co-counsel edits; correspond w GCG and co-counsel re same.	0.2	
2/21/2018	DWM	(Billing Judgment) Review emails from co-counsel and draft email to GCG re filing.	0.0	0.1
2/21/2018	DWM	(Billing Judgment) Review GCG email re filing.	0.0	0.1
2/21/2018	DWM	Conduct phone call with client and draft email re same to GCG.	0.2	
2/21/2018	DWM	Review email and documents from potential class member; draft and send email to KES re same.	0.2	
2/21/2018	KES	Review emails regarding additional putative class member documents for files.	0.2	
2/21/2018	KES	Review emails re hearing date for SAC.	0.1	
2/21/2018	KES	Update electronic research files.	0.1	
2/21/2018	KES	Update status of CaseMap documents.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/22/2018	GCG	Conference with DM re client documents.	0.1	
2/22/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re discovery.	0.0	0.1
2/22/2018	DWM	(Billing Judgment) File notices.	0.0	0.3
2/22/2018	DWM	(Billing Judgment) Discuss client docs w KES.	0.0	0.1
2/22/2018	DWM	Review letter to client.	0.1	
2/22/2018	KES	Draft cover letter and send original documents back to client.	0.4	
2/22/2018	KES	Download and circulate pleadings.	0.1	
2/23/2018	GCG	Conference with GW and KS re case strategy and planning.	0.2	
2/23/2018	GCG	Emails with SC and team re team meeting, preparation for oral argument and serving RFPs.	0.2	
2/23/2018	GCG	Conference with DM re RFPs.	0.1	
2/23/2018	GCG	Fact research.	0.1	
2/23/2018	DWM	Discuss discovery w co-counsel.	0.1	
2/23/2018	DWM	Discuss upcoming meetings and discovery requests w GCG.	0.1	
2/23/2018	DWM	(Billing Judgment) Review news provided by co-counsel.	0.0	0.1
2/23/2018	DWM	(Billing Judgment) Discuss scheduling w GCG; and review scheduling email.	0.0	0.1
2/23/2018	DWM	Discuss discovery requests w GCG and send email to co-counsel.	0.1	
2/23/2018	DWM	(Reduced Charge) Review co-counsel emails and draft response.	0.2	0.3
2/24/2018	GCG	Emails with GW and DM re ADA-related revisions to discovery requests.	0.2	
2/24/2018	DWM	(Billing Judgment) Review GCG email.	0.0	0.1
2/25/2018	DWM	Review client email; correspond w GCG re same.	0.1	
2/26/2018	GCG	Oversee e-filings with removal of CDH as counsel.	0.2	
2/26/2018	GCG	Conference and emails with DM and emails with SC and GW re death of named Plaintiff.	0.2	
2/26/2018	GCG	Review discovery requests; emails re service of same.	0.3	
2/26/2018	DWM	Call with potential class member; draft notes.	0.2	
2/26/2018	DWM	Discuss fact updates and named plaintiff death with GCG.	0.2	
2/26/2018	DWM	Draft and send email to client.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/26/2018	DWM	(Billing Judgment) Review co-counsel and GCG emails re discovery.	0.0	0.1
2/26/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails.	0.0	0.1
2/26/2018	KES	Draft, finalize and file notice of change in counsel; email team re same.	0.4	
2/27/2018	GCG	Email with KC and DR re dismissal without prejudice.	0.2	
2/27/2018	GCG	Begin preparing KC declaration in support of class certification.	0.2	
2/27/2018	GCG	Revise letter to Defendants re death of Plaintiff; email with co-counsel re same.	0.2	
2/27/2018	DWM	Review client email.	0.1	
2/27/2018	DWM	(Billing Judgment) Review case blurb.	0.0	0.1
2/27/2018	DWM	Draft letter to defense counsel and send to GCG.	0.3	
2/27/2018	DWM	(Billing Judgment) Review GCG and co-counsel email.	0.0	0.1
2/27/2018	KES	Review and analyze documents for production.	1.8	
2/28/2018	GCG	Draft class certification declarations.	0.2	
2/28/2018	GCG	Conference and emails with DM re oral argument on motions to amend and compel arbitration and communications with BJH re letters to Brookdale.	0.3	
2/28/2018	GCG	Emails with co-counsel re letter to Defendants.	0.2	
2/28/2018	GCG	Revise letter to Defendants re death of AL and SAC.	0.1	
2/28/2018	DWM	Discuss letter to defense counsel w GCG.	0.1	
2/28/2018	DWM	(Billing Judgment) Review client emails and draft questions for GCG.	0.0	0.2
2/28/2018	DWM	Review GCG and co-counsel emails re letter and complaint.	0.1	
2/28/2018	DWM	(Billing Judgment) Correspond w GCG re schedule for briefing.	0.0	0.1
2/28/2018	DWM	Discuss client questions and pending motions w GCG.	0.2	
2/28/2018	DWM	(Billing Judgment) Review letter.	0.0	0.1
2/28/2018	DWM	Review new authority on arbitration and draft email re same to GCG.	0.7	
2/28/2018	DWM	Review and respond to GCG and KES emails.	0.1	
2/28/2018	DWM	Review emails from client and conduct phone call w same.	0.3	
2/28/2018	DWM	Draft email to GCG following up on client call.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/28/2018	DWM	Review potentially relevant arbitration case.	0.2	
2/28/2018	DWM	Review case suggested by co-counsel for background on ADA barrier analysis.	0.3	
2/28/2018	KES	Update electronic files and review and update CaseMap with new client documents.	0.7	
2/28/2018	KES	Send letter to opposing counsel.	0.2	
3/1/2018	GCG	Email with GW and team re preparation for oral argument.	0.1	
3/1/2018	GCG	Email from Defendants re AL death and SAC.	0.1	
3/1/2018	GCG	Conferences with DM and KES re Defendants' opposition to motion to amend.	0.2	
3/1/2018	GCG	Email with BBK re declaration In support of class certification.	0.1	
3/1/2018	GCG	Conference with DM re declaration in support of class certification.	0.2	
3/1/2018	BBK	(Billing Judgment) review communications w/ co-counsel re: Oral Argument on pending motions.	0.0	0.1
3/1/2018	DWM	(Billing Judgment) Conference re next steps of case.	0.0	0.2
3/1/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re oral arg. moot.	0.0	0.1
3/1/2018	DWM	(Billing Judgment) update to-do list.	0.0	0.3
3/1/2018	DWM	Review GCG email re upcoming meeting.	0.1	
3/1/2018	DWM	Create list of components for memo re declarations.	0.1	
3/1/2018	DWM	(Billing Judgment) Review GCG email re: next steps.	0.0	0.1
3/1/2018	DWM	(Billing Judgment) Review email w new item on docket.	0.0	0.1
3/1/2018	KES	Review task list.	0.2	
3/1/2018	KES	Check status of client docs in DMS and CaseMap.	0.2	
3/2/2018	GCG	Review and analyze opposition to motion to amend.	0.5	
3/2/2018	GCG	Conference and emails with GW re preparation for oral argument on motions.	0.3	
3/2/2018	BBK	Review weekly case tasklist and communications w/ GCG re: class certification declarations.	0.2	
3/2/2018	BBK	Review Ds' Opposition to Motion for Leave to File SAC.	0.4	
3/2/2018	BBK	Review court order moving re hearing on all pending motions.	0.1	
3/2/2018	KES	Organize cases cited in opposition to motion for leave to file SAC.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/2/2018	KES	Review and circulate court notice.	0.1	
3/2/2018	KES	Prepare hard copies of motion papers for file.	0.2	
3/2/2018	KES	Download and circulate opposition to motion re SAC.	0.1	
3/3/2018	GCG	Begin preparing for oral argument; email BBK and partners re same.	0.3	
3/3/2018	GCG	Review and analyze SAC.	0.2	
3/4/2018	GCG	Review and analyze second amended complaint in anticipation of oral argument questions.	1.0	
3/4/2018	GCG	Begin work on reply brief in support of motion to amend.	0.5	
3/5/2018	GCG	Revise letter to Defendants re attempt to force PL into arbitration; conference and emails with DM and co-counsel re same.	0.3	
3/5/2018	GCG	Emails with co-counsel re argument.	0.1	
3/5/2018	GCG	Conference with DM re reply brief.	0.2	
3/5/2018	GCG	Conference with BBK re preparation for oral argument.	0.1	
3/5/2018	BBK	Communications with GCG re: assisting with preparations for oral argument on motions.	0.1	
3/5/2018	BBK	Communications with co-counsel re: oral argument on motions.	0.1	
3/5/2018	BBK	(Billing Judgment) review DMW report to team re: Brookdale Scotts Valley ED pressuring PL to sign arbitration agreement.	0.0	0.1
3/5/2018	BBK	Review warning letter from GCG to Brookdale co-counsel re: pressure by Brookdale Scotts Valley ED to sign arbitration agreement.	0.1	
3/5/2018	BBK	(Billing Judgment) review KES report re: call from family member of Brookdale Garden Grove resident.	0.0	0.1
3/5/2018	DWM	Review court order, co-counsel, GCG, and BBK emails, and defense counsel letter.	0.2	
3/5/2018	DWM	(Billing Judgment) Discuss case w BBK.	0.0	0.1
3/5/2018	DWM	(Reduced Charge) Discuss pending motions and matters to be drafted w GCG, including reply.	0.2	0.1
3/5/2018	DWM	Review new filings.	0.9	
3/5/2018	DWM	(Billing Judgment) Review GCG and co-counsel scheduling emails.	0.0	0.1
3/5/2018	DWM	Review emails from client.	0.1	
3/5/2018	DWM	Review and respond to client emails; discuss same w GCG.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/5/2018	DWM	Conduct phone call with client; draft email to BBK and GCG re same; discuss same w GCG and KES.	0.4	
3/5/2018	DWM	Draft letter to defense counsel.	0.6	
3/5/2018	DWM	Review and outline arguments for reply brief.	0.6	
3/5/2018	DWM	Review letter and discuss w GCG.	0.1	
3/5/2018	DWM	Call client.	0.1	
3/5/2018	DWM	Review and edit letter to defense counsel.	0.2	
3/5/2018	DWM	Draft reply brief.	1.6	
3/5/2018	DWM	(Billing Judgment) Review memo by KES.	0.0	0.1
3/5/2018	DWM	(Billing Judgment) Review email from client.	0.0	0.1
3/5/2018	KES	TC w son of potential class member and draft memo re same.	1.4	
3/5/2018	KES	Email letter to opposing counsel.	0.1	
3/6/2018	GCG	Conferences with DM re reply in support of motions to amend.	0.2	
3/6/2018	GCG	Emails with co-counsel re reply in support of motions to amend.	0.1	
3/6/2018	GCG	Emails with PL re new Brookdale agreement; conference with DM re same.	0.1	
3/6/2018	GCG	Review Defendants' opposition to motion to amend.	0.1	
3/6/2018	BBK	Review client email to DMW re: Brookdale Scotts Valley E.D. and GCG response.	0.1	
3/6/2018	BBK	Analysis of arguments by Ds and Ps in pending motions to assist in preparation for oral argument.	1.7	
3/6/2018	BBK	Review DMW and GCG updates re: status of draft Reply ISO Motion for Leave to File SAC.	0.1	
3/6/2018	BBK	Review GCG comm. with daughter of prospective class member resident of Brooksdale Loma Linda.	0.1	
3/6/2018	DWM	(Billing Judgment) Review calendar updates and document from client.	0.0	0.1
3/6/2018	DWM	Review new court filing.	0.1	
3/6/2018	DWM	Review client document.	0.2	
3/6/2018	DWM	Review note from client.	0.1	
3/6/2018	DWM	Discuss status of brief and key arguments w GCG.	0.2	
3/6/2018	DWM	Draft reply brief.	5.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 123

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2018	KES	Follow up tc with son of potential class member.	0.3	
3/6/2018	KES	Update CaseMap with new client documents.	0.2	
3/7/2018	GCG	Research re Brookdale structure.	0.2	
3/7/2018	GCG	Review cases and pleadings; prepare for oral arguments.	1.4	
3/7/2018	GCG	Research and revise reply brief.	1.2	
3/7/2018	GCG	Conferences with DM re research and revise reply brief.	0.3	
3/7/2018	GCG	Conferences with BBK and KES re preparation for oral argument.	0.5	
3/7/2018	GCG	Review BBK analysis of ADA argument.	0.2	
3/7/2018	BBK	Research re: ADA public accommodation arguments and prepare bullet points and relevant cases for GCG's preparations for oral argument.	3.2	
3/7/2018	DWM	Review GCG and class member email and correspond re same w KES.	0.1	
3/7/2018	DWM	Draft and revise reply brief.	4.2	
3/7/2018	DWM	Meet w GCG re reply brief.	0.2	
3/7/2018	DWM	Review GCG emails re argument prep.	0.1	
3/7/2018	DWM	Perform legal research re case.	0.2	
3/7/2018	DWM	Legal research in aid of reply brief; discuss same w GCG.	0.4	
3/7/2018	DWM	Draft sections for reply brief and discuss same w GCG.	0.3	
3/7/2018	DWM	Review edits to brief, discuss changes with GCG and draft email distributing brief to co-counsel.	0.4	
3/7/2018	DWM	Review co-counsel emails re brief.	0.1	
3/7/2018	KES	Update master witness list.	0.2	
3/7/2018	KES	Review residency agreement from potential class member.	0.1	
3/7/2018	KES	Gather and review cases and other materials for oral argument prep for motion to strike and motion for leave to file SAC.	2.5	
3/8/2018	GCG	Revise reply brief in support of motion to amend.	1.0	
3/8/2018	GCG	Conferences with DM re finalizing and filing reply brief in support of motion to amend and re courtesy copies.	0.5	
3/8/2018	GCG	Research and draft oral argument outline.	0.5	
3/8/2018	GCG	Review cases cited in Defendants' opposition briefs.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/8/2018	BBK	Review DM's Reply Brief and co-counsel comments thereon.	0.3	
3/8/2018	BBK	Research and prepare bullet points for standing issue for GCG oral argument (and communications with GCG re: additional materials to provide her in preparation).	1.0	
3/8/2018	BBK	Conference w/ DMW re: pending motions and oral argument.	0.1	
3/8/2018	DWM	Discuss status of brief w GCG.	0.1	
3/8/2018	DWM	Cite check and revise brief.	2.1	
3/8/2018	DWM	(Billing Judgment) Discuss status of brief w WP.	0.0	0.1
3/8/2018	DWM	Review near-final copy of brief.	0.5	
3/8/2018	DWM	Review local rules and standing order for filing details.	0.1	
3/8/2018	DWM	(Billing Judgment) Review edits by WP.	0.0	0.1
3/8/2018	DWM	(Billing Judgment) Review WP's tables of contents and authorities.	0.0	0.1
3/8/2018	DWM	(Billing Judgment) Discuss filing and courtesy copies w KES.	0.0	0.1
3/8/2018	DWM	Discuss oral argument prep. tasks w GCG.	0.2	
3/8/2018	DWM	(Billing Judgment) Update to-dos and draft email to KES re witness.	0.0	0.1
3/8/2018	DWM	(Reduced Charge) Discuss pending mots. and next steps w BBK.	0.1	0.2
3/8/2018	KES	Update master witness chart.	0.1	
3/8/2018	KES	Gather cases for argument prep.	0.1	
3/8/2018	KES	File reply, update electronic files and prepare chambers copy re same.	0.5	
3/9/2018	GCG	Review cases and pleadings in preparation for oral argument; Conferences and emails with BBK, DM and KES re same.	1.0	
3/9/2018	GCG	Revise oral argument outline.	0.5	
3/9/2018	GCG	(Reduced Charge) Moot of agreement with GW, SC, BBK and DM.	1.6	0.1
3/9/2018	BBK	Review letter from D.'s counsel IRT GCG letter re: Scotts Valley ED improper communication with Lindstrom.	0.1	
3/9/2018	BBK	Preparations for GCG's moot oral argument.	0.2	
3/9/2018	BBK	GCG's moot oral argument (with DMW, G. Wallace, S. Colby).	1.3	
3/9/2018	DWM	Review letter from defense counsel.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/9/2018	DWM	Discuss filing w GCG and KES.	0.1	
3/9/2018	DWM	Moot oral argument with co-counsel, GCG and BBK.	1.6	
3/9/2018	DWM	Prepare oral argument prep materials for GCG.	1.4	
3/9/2018	DWM	Perform and circulate legal research to prepare GCG for argument.	0.2	
3/9/2018	KES	Gather materials for hearing prep.	0.4	
3/9/2018	KES	Arrange for delivery of chambers copy of reply.	0.1	
3/9/2018	KES	(Billing Judgment) Review letter from opposing counsel.	0.0	0.1
3/9/2018	KES	Review chart re current plaintiff status.	0.1	
3/10/2018	GCG	Review cases and pleadings re Defendants' pending motions.	2.4	
3/10/2018	GCG	Revise oral argument outline.	0.5	
3/10/2018	GCG	Research ADA applicability and assisted living.	1.0	
3/11/2018	GCG	Review and analyze cases and pleadings in support of motions.	1.7	
3/11/2018	GCG	Revise oral argument outline.	0.5	
3/11/2018	GCG	Email KES and DM re cases and issues.	0.2	
3/12/2018	GCG	Conference with KES re documents from potential class members.	0.1	
3/12/2018	GCG	Review and analyze cases and pleadings.	3.4	
3/12/2018	GCG	Revise oral argument outline.	0.5	
3/12/2018	GCG	Conferences with DM and KES re oral argument outline.	0.5	
3/12/2018	GCG	Research re interlocutory appeal.	0.3	
3/12/2018	GCG	Emails with GW and SC re legal issues presented by motions.	0.5	
3/12/2018	BBK	Review GCG communications with G. Wallace & S. Colby re: our position on various issues for oral argument.	0.1	
3/12/2018	DWM	Perform legal and fact research to assist GCG in oral argument prep.	0.6	
3/12/2018	DWM	Review documents in fact research folder; send document responsive to GCG request to GCG; discuss same w GCG.	0.2	
3/12/2018	DWM	Discuss certain regulations w KES and GCG and research and review same.	0.5	
3/12/2018	DWM	Perform legal research re appeals.	0.3	
3/12/2018	DWM	Review RCFE regs.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2018	DWM	Review co-counsel response to question re oral argument.	0.1	
3/12/2018	DWM	Review new correspondence and draft email to KES re same.	0.1	
3/12/2018	KES	Review documents sent by potential class member.	0.3	
3/12/2018	KES	Legal research and prepare cases in connection with oral argument prep.	2.7	
3/13/2018	GCG	Review cases and pleadings in preparation for oral argument.	2.5	
3/13/2018	GCG	Revise oral argument outline.	1.0	
3/13/2018	GCG	Conferences and emails with DM re legal research for argument.	0.8	
3/13/2018	GCG	Conferences and emails with SC re AL death and ADA coverage.	0.5	
3/13/2018	BBK	Conference w/ KES re: calls with prospective class members and declarants.	0.2	
3/13/2018	BBK	Review GCG communications with co-counsel re: further oral argument preparations.	0.2	
3/13/2018	DWM	Discuss research for oral argument w GCG.	0.2	
3/13/2018	DWM	Perform legal research relevant to oral argument.	1.0	
3/13/2018	DWM	Discuss research findings w GCG.	0.2	
3/13/2018	DWM	Review GCG email; perform legal research; respond to email.	0.1	
3/13/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails re clients and argument prep.	0.0	0.1
3/13/2018	DWM	Review and respond to GCG emails re research tasks.	0.1	
3/13/2018	DWM	Research; send to GCG.	0.4	
3/13/2018	KES	Tcs with relatives of two potential class members; update master chart re same; confer team re same.	1.4	
3/13/2018	KES	Gather and highlight cases in connection with oral argument preparation.	1.0	
3/13/2018	KES	Update electronic client documents files.	0.1	
3/14/2018	GCG	Review cases, memorandum and pleadings; prepare for oral argument.	5.4	
3/14/2018	GCG	Conferences with BBK and DM and emails SC and GW re issues in motions and preparation for oral argument.	1.0	
3/14/2018	GCG	Revise oral argument outline.	1.0	
3/14/2018	GCG	Email with JC re HC care and increased Brookdale costs.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/14/2018	GCG	Conference and email with KES re class certification declarations.	0.2	
3/14/2018	BBK	Communications w/ GCG & G. Wallace re: class cert grants for ADA actions.	0.2	
3/14/2018	BBK	Review Brookdale letter to residents re: 2018 price increases.	0.1	
3/14/2018	BBK	Review KES report re: call from family member of former Brookdale Apple Valley resident.	0.1	
3/14/2018	BBK	Meeting w/ GCG and DWM in preparation for 3/15 oral argument.	0.6	
3/14/2018	DWM	Review GCG and co-counsel emails re oral argument.	0.2	
3/14/2018	DWM	Perform legal research; discuss same w GCG; produce and circulate memos.	0.8	
3/14/2018	DWM	(Billing Judgment) Review GCG, KES, and support staff emails re oral argument prep and class member contacts.	0.0	0.1
3/14/2018	DWM	(Billing Judgment) Discuss logistics of oral argument and getting to court w GCG.	0.0	0.1
3/14/2018	DWM	Discuss class member declarations w KES.	0.1	
3/14/2018	KES	Memo re call from relative of Brookdale resident and update master chart.	1.0	
3/14/2018	KES	Additional legal research for oral argument prep.	0.4	
3/14/2018	KES	Update electronic documents files.	0.1	
3/15/2018	GCG	(Reduced Charge) Travel to oral argument on motions to amend, strike - etc.	0.5	0.5
3/15/2018	GCG	Conference and emails with co-counsel re revising SAC and next Steps.	0.4	
3/15/2018	GCG	Conference with BBK, DES and KES re SAC and client documents.	0.2	
3/15/2018	GCG	Conduct oral argument on motions to amend, strike - etc.	1.0	
3/15/2018	MWB	(Billing Judgment) Conference with GCG re hearing and ruling.	0.0	0.5
3/15/2018	MWB	(Billing Judgment) Conference with BBK re FHA claim.	0.0	0.3
3/15/2018	BBK	Communications with GCG/DWM re: oral argument outcome; review GCG email re: preparing SAC and next steps.	0.2	
3/15/2018	BBK	(Billing Judgment) communications with MWB re: availability of FHA claims for disability discrimination in assisted living.	0.0	0.2
3/15/2018	DWM	Attend hearing.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/15/2018	DWM	Meet with Defense counsel, GCG and co-counsel.	0.1	
3/15/2018	DWM	Research question re local rules; discuss same w GCG.	0.1	
3/15/2018	DWM	Discuss case updates and next steps w BBK.	0.1	
3/15/2018	DWM	Review class member email and request filing assistance from KES.	0.1	
3/15/2018	DWM	Review GCG emails re next steps following hearing.	0.1	
3/15/2018	DWM	Place call to co-counsel.	0.1	
3/15/2018	KES	Confer team re hearing.	0.2	
3/15/2018	KES	TC with relative of putative class member.	0.2	
3/16/2018	GCG	Review court orders re referral and motion to amend.	0.1	
3/16/2018	GCG	Emails to DM and KES re same.	0.1	
3/16/2018	BBK	Review Court's minute order and judicial referral issued today.	0.1	
3/16/2018	BBK	(Billing Judgment) review/update DWM case to-do list.	0.0	0.2
3/16/2018	BBK	Review law and article on FHA's applicability to assisted living facilities.	0.2	
3/16/2018	DWM	Discuss case next steps w KES and GCG.	0.1	
3/16/2018	DWM	Review and respond to KES email re class member; conduct phone call with class member; update KES on phone call; update tracking chart.	0.3	
3/16/2018	DWM	Call co-counsel and draft follow-up email.	0.1	
3/16/2018	DWM	(Billing Judgment) Update team to-do list and circulate same to team.	0.0	0.4
3/16/2018	DWM	(Reduced Charge) Review court orders and transcript request.	0.1	0.1
3/16/2018	DWM	Review and respond to BBK email.	0.1	
3/16/2018	KES	Download and circulate court orders and calendar new deadline.	0.2	
3/16/2018	KES	Follow up with team re putative class member calls.	0.2	
3/16/2018	KES	(Billing Judgment) Review task list.	0.0	0.1
3/16/2018	KES	Route hard copy documents to file.	0.1	
3/17/2018	GCG	Email to DM and PL re new agreement and arbitration.	0.1	
3/17/2018	DWM	Review and respond to client and co-counsel emails.	0.2	
3/18/2018	GCG	Review article; email KS re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2018	GCG	Conf w/ DM and emails to PL re revisions to SAC and PL amended agreement.	0.2	
3/19/2018	GCG	Email to JC re court hearing.	0.1	
3/19/2018	DWM	Review client email.	0.1	
3/19/2018	DWM	Schedule time to talk with co-counsel; email client re same.	0.1	
3/19/2018	DWM	Conduct phone call w co-counsel re new legal issues.	0.2	
3/19/2018	DWM	Locate and circulate client doc to co-counsel.	0.1	
3/19/2018	DWM	Conduct phone call w client and email co-counsel w note re call.	0.4	
3/19/2018	DWM	Conduct phone conference w client and co-counsel and send follow-up email to GCG.	0.4	
3/19/2018	DWM	Review and respond to KES email re client docs.	0.1	
3/19/2018	DWM	Discuss client conversation w GCG and send follow-up email to client.	0.2	
3/19/2018	KES	Draft letters to clients and return original documents.	1.0	
3/19/2018	KES	Update electronic client doc files and CaseMap re same.	0.2	
3/20/2018	DWM	Review and respond to co-counsel emails.	0.1	
3/20/2018	DWM	Review email re message from class member.	0.1	
3/20/2018	DWM	(Billing Judgment) Place call to client and leave detailed message.	0.0	0.1
3/20/2018	DWM	Discuss case updates w client.	0.1	
3/21/2018	GCG	Conf w/ DM re SAC revisions and call w/ PL.	0.1	
3/21/2018	GCG	Circulate memo re information from SG.	0.1	
3/21/2018	DWM	Discuss tasks w GCG.	0.2	
3/21/2018	DWM	(Billing Judgment) Review voicemail sent by GCG.	0.0	0.1
3/21/2018	DWM	Review notes from meeting w GCG and update list of tasks.	0.1	
3/21/2018	DWM	Review GCG emails re family councils.	0.1	
3/21/2018	KES	Update CaseMap with additional client documents and brief review of same.	0.4	
3/21/2018	KES	Organize hard copy client documents.	0.1	
3/21/2018	KES	Review transcript of voicemail from class member.	0.1	
3/22/2018	GCG	Conf w/ SG re potential sale of Fountaingrove and Family Council issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/22/2018	GCG	Emails to DM, SC and team re same and re SAC.	0.1	
3/22/2018	BBK	Review communications with co-counsel re: Brookdale meeting w/ prospective class members regarding litigation.	0.1	
3/22/2018	DWM	Perform legal research in response to GCG inquiry.	0.1	
3/22/2018	DWM	Review client documents.	0.1	
3/22/2018	DWM	Review GCG and co-counsel emails.	0.1	
3/22/2018	DWM	Review GCG email re case update.	0.1	
3/22/2018	DWM	Conduct call with client.	0.1	
3/22/2018	DWM	Draft and circulate class rep update email.	0.2	
3/23/2018	GCG	Conf w/ SC re SAC.	0.4	
3/23/2018	GCG	Conf w/ DM re same and re PL communications.	0.1	
3/23/2018	DWM	(Reduced Charge) Discuss case updates w GCG.	0.1	0.1
3/23/2018	DWM	Email co-counsel re client contact.	0.1	
3/23/2018	DWM	(Billing Judgment) Discuss case team meetings w KES.	0.0	0.1
3/23/2018	DWM	Conduct phone call with client; draft follow-up email re same to GCG and co-counsel.	0.1	
3/23/2018	DWM	Update and circulate case to-do list.	0.1	
3/23/2018	KES	Update electronic files and CaseMap.	0.2	
3/23/2018	KES	(Billing Judgment) Review emails re case issues.	0.0	0.1
3/24/2018	GCG	Review and revise SAC.	0.4	
3/24/2018	GCG	Emails to CW, SC and DM re follow up information needed, revising complaint and obtaining plaintiff declarations.	0.2	
3/25/2018	DWM	Review and respond to GCG email.	0.1	
3/26/2018	GCG	Confs and emails to DM re GAL and other declarations and revising SAC.	0.1	
3/26/2018	GCG	Research Brookdale website accessibility.	0.1	
3/26/2018	GCG	Emails to SC and team re same.	0.1	
3/26/2018	GCG	Email potential witness.	0.1	
3/26/2018	BBK	Review communications w/ co-counsel re: proposed revisions to draft SAC.	0.1	
3/26/2018	BBK	Communications w/ MN re: accessibility of Brookdale website.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/26/2018	DWM	(Billing Judgment) Discuss immediate tasks to do today w GCG.	0.0	0.1
3/26/2018	DWM	Review GCG and co-counsel emails; draft email to co-counsel.	0.2	
3/26/2018	DWM	Review past guardian ad litem motions and draft successor motion; perform related legal research.	0.6	
3/26/2018	DWM	Draft emails to clients re issues to discuss.	0.2	
3/26/2018	DWM	(Billing Judgment) Discuss caption questions and timing of filings w CG.	0.0	0.1
3/26/2018	DWM	Discuss newly arising questions w GCG.	0.1	
3/26/2018	DWM	Draft and send email to co-counsel.	0.1	
3/26/2018	DWM	Review and respond to client emails.	0.1	
3/26/2018	DWM	Review and respond to co-counsel email re client.	0.1	
3/26/2018	DWM	(Billing Judgment) Schedule call w client.	0.0	0.1
3/26/2018	DWM	Review guardian ad litem filings to prepare for calls with clients.	0.2	
3/26/2018	DWM	Discuss client docs w KES.	0.1	
3/26/2018	DWM	Prepare for and conduct phone calls w two clients.	0.6	
3/26/2018	DWM	Review complaint related emails and documents and review complaint.	1.9	
3/26/2018	DWM	(Reduced Charge) Discuss case updates w GCG.	0.1	0.1
3/26/2018	DWM	Draft e-mail to co-counsel re client calls and review co-counsel emails.	0.3	
3/26/2018	DWM	(Billing Judgment) Review MSN email re website accessibility.	0.0	0.1
3/26/2018	DWM	(Billing Judgment) Review GCG emails re website and class member.	0.0	0.1
3/26/2018	DWM	Review and respond to co/counsel emails.	0.2	
3/26/2018	DWM	Draft and circulate guardian ad litem declaration.	0.9	
3/26/2018	MSN	(Billing Judgment) Emails with GCG re accessibility of Brookdale website, and fact research re same.	0.0	0.5
3/26/2018	KES	Confer DWM re status of client documents.	0.1	
3/27/2018	GCG	Email w/ potential client.	0.1	
3/27/2018	GCG	Revise draft SAC; confs DM emails to GW, SC and team re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/27/2018	GCG	Revise GAL and executor declarations.	0.2	
3/27/2018	GCG	Conf w/ DM and email to team re same.	0.2	
3/27/2018	GCG	Conf w/ BBK re potential new cause of action.	0.1	
3/27/2018	GCG	Revise memorandum re named plaintiff background.	0.2	
3/27/2018	BBK	Research re: potential new cause of action.	0.5	
3/27/2018	BBK	Conference w/ GCG re: same.	0.1	
3/27/2018	BBK	Review co-counsel's draft Second Amended Complaint.	0.6	
3/27/2018	DWM	Voicemail from residents family member and call family member.	0.2	
3/27/2018	DWM	(Billing Judgment) Prioritize tasks and prep for meeting w GCG.	0.0	0.1
3/27/2018	DWM	Conduct phone call w client.	0.4	
3/27/2018	DWM	Discuss case tasks w GCG and KES; send follow-up email to client.	0.3	
3/27/2018	DWM	(Billing Judgment) Review MSN and co-counsel emails.	0.0	0.1
3/27/2018	DWM	(Billing Judgment) Review and respond to KES emails.	0.0	0.1
3/27/2018	DWM	Conduct phone call w Pat Lindstrom.	0.4	
3/27/2018	DWM	Discuss updates w GCG; draft email to client and email to KES.	0.2	
3/27/2018	DWM	Revise GAL decls; draft email to co-counsel and WP; review GCG email.	0.4	
3/27/2018	DWM	Discuss press release w/ GCG and review email re same.	0.1	
3/27/2018	DWM	Review and respond to GCG email re press release process.	0.1	
3/27/2018	MSN	(Billing Judgment) Emails and calls to GCG re website access issue.	0.0	0.2
3/27/2018	KES	(Billing Judgment) Draft new plaintiff summaries for press release and review documents for same.	0.0	3.3
3/28/2018	GCG	Confs w/ SC and DM and emails to GW re final revisions to SAC.	0.3	
3/28/2018	GCG	Revise class member declarations.	0.1	
3/28/2018	GCG	Conf and emails to CW re client outreach.	0.1	
3/28/2018	GCG	Emails w/ clients re SAC.	0.3	
3/28/2018	GCG	Review letter from AKS refusing to respond to request for production within 30 days.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/28/2018	BBK	Review draft press release to issue with filing of SAC.	0.1	
3/28/2018	BBK	Review letter from Brookdale counsel in response to RFPs.	0.1	
3/28/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails.	0.0	0.1
3/28/2018	DWM	Revise GAL declarations per co-counsel's comments.	0.1	
3/28/2018	DWM	Draft email to clients.	0.2	
3/28/2018	DWM	Perform last review of declarations; draft and send emails to clients re same.	0.2	
3/28/2018	DWM	(Billing Judgment) Review GCG emails re clients and press release.	0.0	0.1
3/28/2018	DWM	(Billing Judgment) Review and respond to KES and GCG emails.	0.0	0.1
3/28/2018	DWM	(Billing Judgment) Discuss GCG question re press release w KES.	0.0	0.1
3/28/2018	DWM	Email to client.	0.1	
3/28/2018	DWM	(Billing Judgment) Review and revise press release; draft email re same.	0.0	0.3
3/28/2018	DWM	(Billing Judgment) Discuss press release and client calls w KES.	0.0	0.1
3/28/2018	DWM	Review letter from Defs.	0.1	
3/28/2018	DWM	Discuss calls to clients w KES.	0.1	
3/28/2018	DWM	(Billing Judgment) Review GCG emails re docs to prepare; discuss same w KES.	0.0	0.2
3/28/2018	DWM	Draft guardian ad litem motion.	1.1	
3/28/2018	DWM	Review and revise motion and draft proposed order.	0.5	
3/28/2018	DWM	Review client and co-counsel emails.	0.1	
3/28/2018	FGL	(Billing Judgment) Email from/to DWM re proposed order and edit/format same.	0.0	0.1
3/28/2018	KES	(Billing Judgment) Tcs with clients re press release and confer DWM re same.	0.0	0.4
3/28/2018	KES	Finalize client declarations.	0.4	
3/28/2018	KES	(Billing Judgment) Emails re press contacts.	0.0	0.2
3/29/2018	GCG	Oversee e-filing of SAC and motion for appointment of GAL.	0.3	
3/29/2018	GCG	Confs and emails w/ SC, DM and KES re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/29/2018	GCG	Attend to client communication and outreach; conf w/ CW re same.	0.2	
3/29/2018	GCG	Conf w/ LB.	0.1	
3/29/2018	GCG	Revise GAL motion.	0.1	
3/29/2018	GCG	Revise SAC.	0.1	
3/29/2018	BBK	(Billing Judgment) review e-notifications confirming filing of SAC and supporting motions for GAL appointment; communications re: issuance of press release.	0.0	0.1
3/29/2018	DWM	(Billing Judgment) review docket activity.	0.0	0.1
3/29/2018	DWM	(Billing Judgment) Review, update, and circulate press release.	0.0	0.3
3/29/2018	DWM	(Billing Judgment) Discuss press matters w GCG; participate in conference call re same w consultant.	0.0	0.3
3/29/2018	DWM	Review message from GCG; place call to client.	0.1	
3/29/2018	DWM	(Billing Judgment) Review and revise press release.	0.0	0.1
3/29/2018	DWM	(Billing Judgment) discuss press release and declaration w KES.	0.0	0.1
3/29/2018	DWM	(Billing Judgment) Discuss final press release steps w GCG and CG.	0.0	0.1
3/29/2018	DWM	Review client email and declaration; reply.	0.1	
3/29/2018	DWM	(Billing Judgment) review emails re press release.	0.0	0.2
3/29/2018	DWM	Review and respond to GCG email.	0.1	
3/29/2018	DWM	Discuss filings and order thereof w GCG.	0.1	
3/29/2018	DWM	(Billing Judgment) Emails re second amended complaint.	0.0	0.4
3/29/2018	DWM	Review KES emails to client and respond to question re same; review consultant email re recent filing.	0.1	
3/29/2018	DWM	Review and revise GAL motions.	0.4	
3/29/2018	DWM	Write co-counsel re sending compl. to all pls.	0.1	
3/29/2018	DWM	Review and file motion w KES.	0.2	
3/29/2018	DWM	Review local rules re chambers copies and e-mail co-counsel re same.	0.1	
3/29/2018	DWM	Review and respond to e-mails re courtesy copies.	0.1	
3/29/2018	KES	Emails to clients with copies of SAC; review records for email addresses for same.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/29/2018	KES	Finalize and file motion for guardian ad litem; send courtesy copy and update files re same.	1.0	
3/29/2018	KES	(Billing Judgment) Confer DWM re press contacts.	0.0	0.1
3/29/2018	KES	Prepare and file transcript order and email to court reporter re same.	0.5	
3/30/2018	DWM	(Billing Judgment) Review press coverage.	0.0	0.1
4/2/2018	GCG	Confs w/ BJH, PL and JG re Scotts Valley issues.	1.2	
4/2/2018	GCG	Conf w/ and emails to CW and team re same.	0.2	
4/2/2018	GCG	Email to LL re SAC.	0.2	
4/2/2018	DWM	Review emails re case updates.	0.1	
4/2/2018	DWM	Call potential class member and draft email re call.	0.2	
4/2/2018	KES	Review documents and email client document to team.	0.3	
4/3/2018	GCG	Review AKS request for additional time.	0.2	
4/3/2018	GCG	Review DM analysis of proposal.	0.1	
4/3/2018	GCG	Emails to DM and GW re negotiation w/ AKS and need to set Rule 26(f) conference.	0.2	
4/3/2018	GCG	Email to clients and co-counsel re article in Santa Cruz Sentinel and general plaintiff outreach.	0.2	
4/3/2018	GCG	(Billing Judgment) Email from attorney who sued Brookdale.	0.0	0.1
4/3/2018	DWM	Review client and witness emails.	0.1	
4/3/2018	DWM	Review GCG email; perform legal research; draft response.	0.4	
4/3/2018	DWM	Conduct phone call w potential class member.	0.3	
4/3/2018	DWM	(Billing Judgment) Review emails re press.	0.0	0.1
4/3/2018	DWM	Discuss timing question w GCG; review emails from GCG and co-counsel re same.	0.1	
4/3/2018	DWM	(Billing Judgment) Review news coverage re case.	0.0	0.1
4/3/2018	DWM	(Billing Judgment) Review GCG and Carl Whitaker emails re press coverage.	0.0	0.1
4/3/2018	KES	(Billing Judgment) Review press re client interview.	0.0	0.1
4/3/2018	KES	Draft and send letter with check for hearing transcript.	0.3	
4/3/2018	KES	Review emails re motions.	0.1	
4/3/2018	KES	Review email from potential witness.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 136

SERVICES

Date	Person	Description of Services	Hours	Discount
4/4/2018	GCG	Confs w/ PL, BJH, BJH son and DM re Scotts Valley ED retaliation in response to Santa Cruz Sentinel article.	0.4	
4/4/2018	GCG	Revise letter to AKS; conf w/ DM re same.	0.2	
4/4/2018	GCG	Email to co-counsel re Scotts Valley retaliation.	0.2	
4/4/2018	BBK	Review GCG draft letter to Brookdale counsel re: new plaintiff B. Jestrabek-Hart.	0.1	
4/4/2018	DWM	Discuss client call w reception; conduct phone call w client and GCG; follow-up call w GCG.	0.5	
4/4/2018	DWM	Conduct conference call w client and GCG.	0.2	
4/4/2018	DWM	Draft letter to defense counsel.	0.3	
4/4/2018	DWM	Review and revise letter for client; draft email transmitting letter.	0.3	
4/4/2018	DWM	Review consultant and co-counsel emails.	0.1	
4/4/2018	DWM	Review and respond to client email.	0.1	
4/4/2018	DWM	Discuss email to clients w GCG; draft email.	0.1	
4/4/2018	DWM	Conduct conference call w client and GCG; save memo as follow-up.	0.4	
4/4/2018	KES	Review email and draft letter re class member issue.	0.1	
4/5/2018	GCG	Emails to AKS and GW re defendants' request for extension and delayed Rule 26(f) conference.	0.1	
4/5/2018	GCG	Email w/ potential witness.	0.1	
4/5/2018	GCG	Email to KS and team re retaliation at Scotts Valley; approach to same.	0.1	
4/5/2018	DWM	Review GCG and co-counsel emails.	0.1	
4/5/2018	KES	Review emails re client issues.	0.1	
4/6/2018	GCG	Conf w/ BBK, DM and KES re need for Rule 26 conference, motion re same, and drafting class cert declarations.	0.5	
4/6/2018	GCG	Emails w/ GW and team re AKS request for stipulated briefing schedule.	0.2	
4/6/2018	GCG	Conf w/ and email to KES re potential witness interview.	0.1	
4/6/2018	BBK	Review report from family of prospective plaintiff at Brookdale Scotts Valley.	0.1	
4/6/2018	BBK	Comm'ns w/ co-counsel and opposing counsel re: Rule 26(f) conference.	0.2	
4/6/2018	BBK	Meeting w/ GCG/DWM/KES.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2018	BBK	Review updated case task list distributed by DWM.	0.1	
4/6/2018	DWM	Review GCG and co-counsel emails.	0.1	
4/6/2018	DWM	Review email from KES re potential class member.	0.1	
4/6/2018	DWM	Meet w GCG, BBK, and KES re case updates and next steps.	0.5	
4/6/2018	DWM	(Billing Judgment) Discuss docusign w JSY; set up time for walkthrough; review JSY email w info re same.	0.0	0.1
4/6/2018	DWM	(Billing Judgment) Update Brookdale to-do list; update personal case to-do list.	0.0	0.4
4/6/2018	JSY	(Billing Judgment) Conf. w/ DM re Docusign for declarations.	0.0	0.1
4/6/2018	FFV	(Billing Judgment) Update contact and materials to fact research.	0.0	0.2
4/6/2018	KES	TC relative of former Brookdale resident and follow up email re same.	0.9	
4/6/2018	KES	(Reduced Charge) Team meeting re case status, tasks and follow up email re same.	0.5	0.1
4/6/2018	KES	Update electronic documents files.	0.1	
4/8/2018	GCG	Email to PL and DM re retaliation against named plaintiffs for speaking to press.	0.1	
4/8/2018	DWM	Review and respond to client email.	0.1	
4/9/2018	GCG	Conf w/ GW re need to hold Rule 26 conference.	0.1	
4/9/2018	GCG	Email to GW and AKS re stipulation.	0.1	
4/9/2018	GCG	Review stipulation.	0.1	
4/9/2018	GCG	Confs w/ and emails to DM re motion for Rule 26 conference and retaliation against PL for participation in case.	0.2	
4/9/2018	BBK	Review filed stipulation for briefing schedule on responsive motions to Second Amended Complaint.	0.1	
4/9/2018	BBK	Review comm'ns from family member of Brookdale Oak Tree Villa resident and prospective class member.	0.1	
4/9/2018	DWM	Review and respond to client email.	0.1	
4/9/2018	DWM	Review on-line inquiry from potential class member; add key details to tracker; leave detailed message for potential class member.	0.1	
4/9/2018	DWM	Review class member contacts and correspond w KES re same.	0.2	
4/9/2018	DWM	Discuss forthcoming motion w GCG.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/9/2018	DWM	(Billing Judgment) Study docusign system w JSY.	0.0	0.3
4/9/2018	DWM	(Billing Judgment) Review and confirm settings on DocuSign account.	0.0	0.1
4/9/2018	DWM	Review filed stipulation and GCG and co-counsel emails re same.	0.1	
4/9/2018	DWM	Review email and docs from class member.	0.1	
4/9/2018	DWM	(Billing Judgment) Review research and news publications selected by GCG and relevant to case.	0.0	0.8
4/9/2018	DWM	Review Rule 26 requirements.	0.1	
4/9/2018	DWM	Conduct phone call with client and discuss same w GCG.	0.3	
4/9/2018	JSY	(Billing Judgment) Conf. w/ DM re Docusign procedures; training.	0.0	0.5
4/9/2018	KES	TC relative of former Brookdale resident and follow up emails re same.	0.4	
4/9/2018	KES	Update master class member chart.	0.3	
4/9/2018	KES	Update putative class member documents files.	0.3	
4/9/2018	KES	Download and circulate stipulation and calendar deadlines.	0.3	
4/9/2018	KES	Review email from client and prepare memo re same.	0.1	
4/10/2018	GCG	Review oral argument transcript.	0.1	
4/10/2018	GCG	Conf w/ and email to DM re same and re motion for relief from Rule 26 stipulation.	0.2	
4/10/2018	BBK	Review transcript of 3/15/18 hearing on multiple motions.	0.1	
4/10/2018	BBK	Review KES report from family of Brookdale Sun City resident.	0.1	
4/10/2018	DWM	Review voicemail from potential class member.	0.1	
4/10/2018	DWM	Review class member information; conduct call with class member; input summary into tracker.	0.3	
4/10/2018	DWM	Review relevant portions of hearing transcript.	0.1	
4/10/2018	DWM	Preform legal research to draft motion re relief from stipulation.	2.1	
4/10/2018	DWM	Continue research re motion and begin to draft motion.	1.0	
4/10/2018	DWM	(Billing Judgment) Discuss Rule 26 requirements w MSN.	0.0	0.1
4/10/2018	KES	Draft and circulate memo re conversation with relative of former Brookdale resident.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2018	KES	Circulate hearing transcript.	0.1	
4/11/2018	GCG	Conf w/ DM re motion for relief from Rule 26 stipulation.	0.1	
4/11/2018	BBK	(Billing Judgment) review K. Stebner article re: understaffing claims against assisted living facilities.	0.0	0.2
4/11/2018	DWM	(Reduced Charge) Discuss legal research and motion w GCG.	0.1	0.1
4/11/2018	DWM	Perform legal research and draft motion.	1.4	
4/11/2018	DWM	Draft motion.	0.7	
4/11/2018	KES	Update electronic pleadings files.	0.1	
4/12/2018	GCG	Legal research re claims.	0.1	
4/12/2018	GCG	Conf w/ DM re motion re Rule 26.	0.1	
4/12/2018	BBK	Review DMW draft administrative motion for Rule 26(f) conference and supporting attorney declaration and exhibits; draft revisions thereto.	2.2	
4/12/2018	BBK	Comm'ns w/ DMW re: proposed revisions to draft administrative motion for Rule 26(f) conference.	0.1	
4/12/2018	DWM	Discuss motion w BBK.	0.1	
4/12/2018	DWM	Draft motion argument section; revise and edit motion; review exhibits and draft accompanying declaration.	2.6	
4/12/2018	DWM	Review materials re related case.	0.1	
4/12/2018	DWM	Discuss motion and review process w GCG.	0.1	
4/12/2018	DWM	Discuss revisions to motion w BBK.	0.1	
4/12/2018	DWM	Review BBK edits to motion and revise accordingly.	0.5	
4/12/2018	KES	Prepare exhibit for motion.	0.1	
4/12/2018	KES	Update electronic files.	0.1	
4/13/2018	GCG	Conf w/ DM re motion for relief from Rule 26 stip.	0.2	
4/13/2018	GCG	Email to DM re case to do list.	0.1	
4/13/2018	GCG	Review DM brief; email to DM re same.	0.2	
4/13/2018	BBK	Review DMW's revised Admin Motion for Rule 26(f) conference.	0.2	
4/13/2018	CET	(Billing Judgment) confer w/ DWM re: drafting class member declarations.	0.0	0.2
4/13/2018	DWM	Revise motion; draft emails to GCG re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2018	DWM	(Billing Judgment) Discuss declaration drafting process w CET.	0.0	0.2
4/13/2018	DWM	Discuss case updates w GCG; correspond w case team.	0.2	
4/13/2018	DWM	Correspond w co-counsel.	0.1	
4/13/2018	DWM	(Billing Judgment) Review and update case to-do list and draft email circulating same to case team.	0.0	0.3
4/13/2018	DWM	Locate and review class member declarations in files; begin to formulate plan for declaration prep and processing.	0.5	
4/13/2018	DWM	Review GCG comments on draft; revise per comments and search for relevant files.	0.6	
4/16/2018	GCG	Research and revise administrative motion re Rule 26(f).	0.7	
4/16/2018	GCG	Confs w/ and emails to DM re same and re Grunfeld declaration and exhibits.	0.3	
4/16/2018	GCG	Revise Grunfeld declaration ISO administrative motion.	0.2	
4/16/2018	GCG	Review Judge Gilliam order relating cases and review Judge Gilliam motions calendar.	0.2	
4/16/2018	GCG	Email to co-counsel re same.	0.1	
4/16/2018	BBK	Review/update case task list distributed by DMW.	0.1	
4/16/2018	BBK	Review Court orders relating case to Winans and transferring to Judge Gilliam.	0.1	
4/16/2018	BBK	Review revised draft of Admin Motion for Rule 26(f) conference sent for review by co-counsel.	0.2	
4/16/2018	DWM	Review court order.	0.1	
4/16/2018	DWM	Review GCG e-mail re filing and discuss same w CG.	0.1	
4/16/2018	DWM	Call co-counsel re document; review same and send for proper filing.	0.2	
4/16/2018	DWM	Review and revise motion and declaration; review file for relevant documents.	2.2	
4/16/2018	DWM	Discuss motion and declaration w GCG.	0.2	
4/16/2018	DWM	Review and circulate motion.	0.3	
4/16/2018	KES	Update electronic files.	0.3	
4/16/2018	KES	Download, review and circulate court orders.	0.2	
4/16/2018	KES	Prepare exhibit for upcoming motion.	0.1	
4/16/2018	KES	Arrange for caption update.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2018	GCG	Research and revise administrative motion.	0.8	
4/17/2018	GCG	Research and revise Grunfeld decl.	0.4	
4/17/2018	GCG	Review proposed order.	0.1	
4/17/2018	GCG	Confs w/ and emails to GW, SC, DM and KES re admin motion.	0.2	
4/17/2018	GCG	Revise SC message to Family council.	0.1	
4/17/2018	BBK	(Billing Judgment) review S. Colby's proposed case update for named Plaintiff to share with Family Council.	0.0	0.1
4/17/2018	BBK	(Billing Judgment) review comm'ns w/ co-counsel re: finalizing Administrative Motion for Rule 26(f) Conference and e-notice of filing.	0.0	0.1
4/17/2018	DWM	Review and revise motion and declaration.	0.8	
4/17/2018	DWM	Review and respond to GCG emails re motion.	0.1	
4/17/2018	DWM	Discuss motion w GCG and review past declaration.	0.1	
4/17/2018	DWM	Review and revise motion and GCG declaration in accordance with legal and factual research and GCG and co-counsel comments; discuss same w GCG.	0.9	
4/17/2018	DWM	Discuss filing w KES.	0.1	
4/17/2018	DWM	Review requirements for and draft proposed order.	0.3	
4/17/2018	DWM	Cite and fact check declaration, motion, and proposed; discuss changes w GCG.	1.2	
4/17/2018	DWM	Review correspondence w class members summarizing case status.	0.1	
4/17/2018	DWM	Review consolidated exhibits and correspond re same.	0.1	
4/17/2018	DWM	Discuss add'l edits and filing steps w GCG and KES; coordinate filing w KES.	0.3	
4/17/2018	KES	Finalize and file admin motion and update electronic files; email proposed order to judge re same; confer team re same.	1.0	
4/18/2018	GCG	Conf w/ DM and emails to KES re courtesy copies.	0.1	
4/18/2018	DWM	(Billing Judgment) Review filed and e-mailed documents for accuracy and completeness.	0.0	0.1
4/18/2018	DWM	Review minute entry and GCG email and draft response email.	0.2	
4/18/2018	DWM	Discuss filing and local rules w KES; review KES email re same; discuss filing w GCG.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2018	KES	Prepare and send chambers copy of admin motion; review standing orders re same.	0.5	
4/18/2018	KES	Calendar motion response deadline.	0.1	
4/19/2018	GCG	Review Judge Gilliam order re CMC.	0.1	
4/19/2018	GCG	Initial review of defendants' motion.	0.1	
4/19/2018	GCG	Conf w/ DM re next steps.	0.1	
4/19/2018	BBK	Review court order setting CMC for 4/24; review e-notices for filing of Ds three renewed motions.	0.1	
4/19/2018	DWM	Review correspondence from potential class member.	0.1	
4/19/2018	DWM	Discuss upcoming deadlines and action items w GCG.	0.1	
4/19/2018	DWM	Review e-mail from class members; review relevant notes from previous contact and site visit; draft reply.	0.3	
4/19/2018	DWM	Review and discuss w GCG court order and calendar relevant date.	0.1	
4/19/2018	DWM	Continue to organize process for declarations; discuss same w WP; review class member declaration.	0.5	
4/19/2018	DWM	Review defs’ mot.	0.5	
4/19/2018	KES	Review court notice re CMC.	0.1	
4/20/2018	GCG	Conf w/ GW re CMC.	0.2	
4/20/2018	GCG	Conf w/ BBK, DM and KES re same and re class cert.	0.3	
4/20/2018	GCG	Review local rules and standing orders; email DM and team re same.	0.2	
4/20/2018	GCG	Conf w/ SG re Fountaingrove issues.	0.2	
4/20/2018	GCG	Prepare for CMC.	0.2	
4/20/2018	BBK	Conference w/ DWM re: Defendants' motions filed 4/19 and order setting CMC statement.	0.1	
4/20/2018	BBK	Team meeting w/ DWM, GCG, and KES.	0.3	
4/20/2018	BBK	Comm'ns w/ KES re: inquiry from daughter of Brookdale Irvine resident.	0.1	
4/20/2018	BBK	Comm'ns w/ team re: CMC Statement.	0.1	
4/20/2018	BBK	Comm'ns w/ G. Wallace, GCG, and DWM re: drafting of Oppositions to Ds' motions.	0.1	
4/20/2018	DWM	Review client e-mail and provide same to GCG; draft response to client.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/20/2018	DWM	Discuss recent motions a upcoming hearing w BBK.	0.1	
4/20/2018	DWM	(Billing Judgment) Discuss motions and hearing w KES.	0.0	0.1
4/20/2018	DWM	Revise and review class member declaration.	0.8	
4/20/2018	DWM	(Billing Judgment) Review and update to-do list.	0.0	0.1
4/20/2018	DWM	(Reduced Charge) Participate in Brookdale team meeting.	0.3	0.1
4/20/2018	DWM	(Billing Judgment) Revise personal and team to-do lists per meeting.	0.0	0.1
4/20/2018	DWM	Preform research re need for CMC statement; discuss same w GCG; draft memorandum e-mail to co-counsel re same.	0.7	
4/20/2018	DWM	Review message from class member; correspond w KES re same.	0.1	
4/20/2018	DWM	Review memo w message from class member.	0.1	
4/20/2018	DWM	Discuss class member call w KES.	0.1	
4/20/2018	DWM	Review GCG e-mail re briefing and CMC; discuss same w BBK; draft response.	0.2	
4/20/2018	DWM	Review GCG e-mails re documents needed and case plans; find documents and respond.	0.1	
4/20/2018	DWM	Review Defs.' Mots.' proposed orders.	0.2	
4/20/2018	FGL	(Billing Judgment) Transcribe voicemail from S. Grant into GCG-Memo to file.	0.0	0.2
4/20/2018	KES	TC relative of Brookdale resident; confer GCG and DWM re same and update master chart re same.	0.7	
4/20/2018	KES	Team meeting re case status, upcoming motions.	0.4	
4/20/2018	KES	Download and circulate pleadings.	0.2	
4/20/2018	KES	Prepare copies of renewed motions for attorneys.	0.7	
4/23/2018	GCG	Prepare for CMC; emails to GW and team re same.	0.2	
4/23/2018	GCG	Review defendants' Opp to Admin Motion.	0.2	
4/23/2018	GCG	Email w/ DM re letter from Brookdale to BJH re Family council.	0.1	
4/23/2018	BBK	Review Defendants Opposition to Admin Motion for Rule 26(f) Conference and Suarez case relied upon therein.	0.3	
4/23/2018	BBK	Comm'ns w/ team re: preparation for 4/24 case management confernece.	0.1	
4/23/2018	BBK	Review updates from DWM and KES re: recent comm'ns w/ clients and prospective class members.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/23/2018	BBK	Review Defendants' renewed motion to dismiss.	0.6	
4/23/2018	DWM	Review Defs.' filing and related case and e-mail from co-counsel.	0.3	
4/23/2018	DWM	Review GCG and co-counsel e-mails re pending motion.	0.1	
4/23/2018	DWM	Review KES e-mail re class member; draft response.	0.1	
4/23/2018	DWM	Discuss recent events w client; draft e-mail to GCG, BBK, and KES re same.	0.3	
4/23/2018	DWM	Review correspondence from client; draft e-mails to GCG and KES re same.	0.2	
4/23/2018	DWM	(Billing Judgment) Review client correspondence saved by KES; discuss w GCG.	0.0	0.1
4/23/2018	KES	Review and circulate new client documents.	0.2	
4/23/2018	KES	Follow up email with relative of Brookdale resident and confer DWM re same.	0.4	
4/23/2018	KES	Download and circulate filed pleadings.	0.1	
4/23/2018	KES	Prepare copies of documents in preparation for hearing.	0.2	
4/24/2018	GCG	(Reduced Charge) Travel to case management conference.	0.5	0.5
4/24/2018	GCG	Follow up conference w/ GW and SC re FHA and opp schedule; planning motion for expedited briefing.	0.3	
4/24/2018	GCG	Confs w/ DM re letter from BJH and opposition briefing schedule.	0.2	
4/24/2018	GCG	Confs w/ BBK re legal research for opposition.	0.2	
4/24/2018	GCG	Email to GW and team re local rule on stipulations/ briefing schedule.	0.2	
4/24/2018	GCG	Prepare for and participate in case management conference.	1.5	
4/24/2018	BBK	Conference w/ GCG re: Opposition to MTD with co-counsel; further research on Unruh Act and FHA.	0.2	
4/24/2018	BBK	Review/compare Plaintiffs' prior Opposition to MTD to current arguments raised by Defendants.	0.5	
4/24/2018	BBK	Emails re Opposition with co-counsel.	0.2	
4/24/2018	BBK	Comm'ns w/ GCG and co-counsel re: Opposition.	0.2	
4/24/2018	BBK	Comm'ns w/ full team re: outcome of Case Management Conference.	0.2	
4/24/2018	DWM	(Reduced Charge) Discuss client correspondence and upcoming hearing and motion opp'ns w GCG.	0.3	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2018	DWM	Review GCG, BBK, and co-counsel e-mails re motion briefing.	0.1	
4/24/2018	DWM	Review GCG's email re hearing.	0.1	
4/24/2018	DWM	Discuss case updates w GCG.	0.1	
4/24/2018	DWM	Review local rules and draft e-mail re same.	0.2	
4/24/2018	KES	(Billing Judgment) Review email re hearing.	0.0	0.1
4/24/2018	KES	Email with materials for hearing prep.	0.1	
4/25/2018	GCG	Review court minute order.	0.1	
4/25/2018	GCG	Emails to GW and team re same, re briefing schedule and re Brookdale article.	0.1	
4/25/2018	GCG	Conf w/ DM re motion to shorten time.	0.1	
4/25/2018	BBK	Comm'ns w/ team re: sending case update to clients.	0.1	
4/25/2018	BBK	Review B. Jestrabek-Hart draft letter to Brookdale Scott Valley.	0.1	
4/25/2018	DWM	Review proposed case update for class member drafted by co-counsel.	0.1	
4/25/2018	DWM	Review court order.	0.1	
4/25/2018	DWM	Conduct phone call w potential class member.	0.2	
4/25/2018	DWM	Review and revise client letter; draft e-mail to colleagues re same.	0.5	
4/25/2018	DWM	Discuss motion to move up hearing w GCG.	0.1	
4/25/2018	KES	Download and circulate court order.	0.1	
4/25/2018	KES	(Billing Judgment) Review and circulate article re new Brookdale CEO.	0.0	0.2
4/26/2018	GCG	Email w/ DM re motion to move hearing and communication w/ client.	0.1	
4/26/2018	GCG	Conf w/ SC and emails to GW re motion to advance hearing date and briefing stipulation.	0.2	
4/26/2018	GCG	Revise briefing stipulation; emails to CS, DM and team re same.	0.2	
4/26/2018	GCG	Email w/ potential witness.	0.1	
4/26/2018	BBK	Planning opposition to motion to dismiss.	0.2	
4/26/2018	BBK	Review final draft Stipulation on parties briefing schedule on pending motions; comm'ns w/ GCG and co-counsel re: finalizing and filing Stip.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2018	BBK	Review/revise DWM's draft admin motion to shorten time for hearing on pending motions.	0.2	
4/26/2018	DWM	Discuss motion w GCG.	0.1	
4/26/2018	DWM	Review and respond to co-counsel response to letter edits.	0.1	
4/26/2018	DWM	Perform final review of client letter; draft e-mail to client.	0.3	
4/26/2018	DWM	Review GCG correspondence w Brookdale resident's family member.	0.1	
4/26/2018	DWM	Perform legal research and review local rules and standing order re hearing timing.	0.5	
4/26/2018	DWM	Draft motion to shorten time for hearing and transmit same to GCG.	1.7	
4/26/2018	DWM	Review BBK correspondence re admin. motion and BBK edits.	0.1	
4/26/2018	DWM	(Billing Judgment) Discuss pace of class member calls w KES.	0.0	0.1
4/27/2018	GCG	Conf w/ BBK and KES re approach to opposition to motions to dismiss and ongoing class member outreach.	0.3	
4/27/2018	GCG	Emails to GW, SC and team re revisions to briefing schedule stipulation and motion to shorten time.	0.3	
4/27/2018	BBK	Review e-notice and comm'ns w/ team re: filing of Stipulation for briefing schedule.	0.1	
4/27/2018	BBK	Analysis/planning of portions of Opposition to MTD to draft on Winans release, CLRA/UCL claims, and Carlson's post-Dec. 2017 claims.	2.2	
4/27/2018	BBK	Team meeting.	0.3	
4/27/2018	BBK	Comm'ns w/ team re: submitting Request for Judicial Notice of Brookdale's SEC filing confirming facilities are subject to ADA.	0.1	
4/27/2018	BBK	Review KES update re: arbitration opt-out by resident of Brookdale Irvine.	0.1	
4/27/2018	DWM	Discuss local rule question w GCG; find local rule and send same to GCG.	0.1	
4/27/2018	DWM	Review filed stip and e-mails re same.	0.1	
4/27/2018	DWM	Review update emails from KES, BBK, and GCG.	0.1	
4/27/2018	DWM	Review client email and letter.	0.1	
4/27/2018	KES	Update and circulate master tracking chart.	0.2	
4/27/2018	KES	Team meeting re case status.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2018	KES	Review residency agreement from Brookdale resident and email team re same.	0.2	
4/27/2018	KES	Email team re stipulation.	0.1	
4/29/2018	GCG	Conf w/ DM re class cert declaration.	0.1	
4/29/2018	GCG	Review SC emails re client outreach and briefing schedule.	0.1	
4/29/2018	DWM	Discuss declarations w GCG.	0.1	
4/29/2018	DWM	Review and update class member declarations.	1.4	
4/30/2018	GCG	Review court orders regarding motion briefing schedule.	0.1	
4/30/2018	GCG	Review intake emails; conf w/ and email to KES regarding same.	0.2	
4/30/2018	GCG	Review and revise motion to move hearing date; conf and email to DM regarding same.	0.2	
4/30/2018	BBK	Review Court Order granting stip on briefing schedule.	0.1	
4/30/2018	DWM	Review court orders.	0.1	
4/30/2018	DWM	Review court orders and KES, GCG e-mails re same.	0.1	
4/30/2018	DWM	Discuss class member questions and follow-up w KES.	0.1	
4/30/2018	DWM	Conduct call with class member's representative.	0.2	
4/30/2018	DWM	Discuss motion w GCG and review e-mail regarding same.	0.1	
4/30/2018	FGL	Email from/to DWM re Declarations and edit same.	0.4	
4/30/2018	KES	Calendar new deadlines.	0.2	
4/30/2018	KES	Confer DWM re follow up with relative of Brookdale resident.	0.1	
4/30/2018	KES	Review and update master tracking chart.	0.1	
5/1/2018	GCG	Conf w/ DM and emails to SC regarding motion to shorten time.	0.2	
5/1/2018	GCG	Emails to KES regarding factual research.	0.1	
5/1/2018	BBK	Review comm'ns regarding: finalizing and filing admin motion to shorten time for hearing on Defendants' pending motions.	0.1	
5/1/2018	DWM	Correspond w GCG regarding motion.	0.1	
5/1/2018	DWM	Discuss motion to be filed w GCG.	0.1	
5/1/2018	DWM	Review GCG edits to motion; review relevant item on docket report; and respond to related email.	0.2	
5/1/2018	FGL	Edit Admin Motion to Shorten Time.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/1/2018	KES	Update electronic research files.	0.1	
5/2/2018	GCG	Research and draft email to defendants regarding moving up hearing date.	0.1	
5/2/2018	GCG	Conf w/ DM regarding same.	0.1	
5/2/2018	DWM	Discuss w GCG and review correspondence to defense counsel.	0.1	
5/2/2018	DWM	Review arguments in Defs' mot to compel.	1.1	
5/3/2018	GCG	Conf w/ DM regarding arbitration cost case and opposition to motion to compel.	0.3	
5/3/2018	GCG	Email w/ DM regarding ML.	0.1	
5/3/2018	BBK	Attend to preparing Opposition to Motion to Dismiss.	0.1	
5/3/2018	DWM	Review key arguments and begin drafting opponent to defs.' mot.	0.8	
5/3/2018	DWM	Review GCG and client e-mails.	0.1	
5/3/2018	DWM	Review case summary provided by GCG and perform legal research regarding new of argument.	0.7	
5/3/2018	DWM	Discuss defs.' filings w GCG.	0.2	
5/3/2018	DWM	Discuss case updates and other matters w client.	0.2	
5/4/2018	GCG	Legal and factual research regarding CEO interview, new class cert. decision and REIT issues.	0.4	
5/4/2018	GCG	Email w/ JB regarding oral argument schedule.	0.1	
5/4/2018	GCG	Conf w/ DM and email co-counsel regarding 2d administrative motion.	0.2	
5/4/2018	BBK	Review comm'ns between J. Barker & GCG regarding: stipulating to move hearing on defendants' motions.	0.1	
5/4/2018	DWM	Review GCG and defense counsel correspondence.	0.1	
5/4/2018	DWM	Review GCG and KES e-mails regarding relevant precedent.	0.1	
5/4/2018	DWM	Discuss motion w GCG.	0.2	
5/4/2018	DWM	(Billing Judgment) Review relevant new story and GCG and co-counsel e-mails regarding same.	0.0	0.1
5/4/2018	KES	Westlaw research.	0.1	
5/4/2018	KES	(Billing Judgment) Review and circulate article for fact research.	0.0	0.1
5/6/2018	GCG	Revise motion to move hearing date; email to DM regarding revisions and co-counsel review.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 149

SERVICES

Date	Person	Description of Services	Hours	Discount
5/6/2018	DWM	Revise motion, draft accompanying declaration and proposed order, draft email transmitting same to GCG.	1.2	
5/6/2018	DWM	Review GCG email and edits, send draft mot to co-counsel.	0.1	
5/7/2018	GCG	Final revisions to pleadings ISO motion to move hearing date.	0.2	
5/7/2018	GCG	Oversee e-filing; conf w/ DM and emails to KES regarding same.	0.1	
5/7/2018	BBK	Review DWM's final draft motion to shorten time for hearing on defendants' pending motions.	0.1	
5/7/2018	DWM	Review co-counsel response to motion; create new exhibit.	0.1	
5/7/2018	DWM	Discuss next steps toward motion filing w GCG.	0.1	
5/7/2018	DWM	Conduct phone call with class member's representative; draft follow-up e-mail; input notes into tracker.	0.4	
5/7/2018	DWM	Review GCG edits to motion.	0.2	
5/7/2018	DWM	Review docs for filing; discuss same w GCG and FFV; and coordinate filing w KES.	0.3	
5/7/2018	FFV	Finalize and prepare pleading docs for filing regarding motion to shorten time.	0.5	
5/7/2018	KES	File administrative motion, email to judge with proposed order and update electronic files regarding same.	0.4	
5/8/2018	BBK	Review Order entered by Judge Gilliam granting motion to shorten time for hearing & notice setting hearing for July 12.	0.1	
5/8/2018	DWM	Review court order and correspond regarding same w KES.	0.1	
5/8/2018	DWM	Review client e-mail.	0.1	
5/8/2018	KES	Review email and document from relative of Brookdale resident and update electronic file.	0.2	
5/9/2018	GCG	Research and draft declaration in opposition to motion to compel arbitration.	0.8	
5/9/2018	GCG	Conf w/ JC regarding HC finances.	0.2	
5/9/2018	GCG	Confs w/ DM regarding legal and factual research for opposition brief.	0.2	
5/9/2018	GCG	Research and draft letter to named plaintiffs.	0.7	
5/9/2018	GCG	Conf w/ SC regarding same and regarding request for judicial notice.	0.2	
5/9/2018	GCG	Emails to DM, KES and team regarding witness documents.	0.2	
5/9/2018	BBK	Researching & drafting Opposition to MTD.	2.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2018	DWM	Review GCG and co-counsel emails regarding depositions.	0.1	
5/9/2018	DWM	Review correspondence from class member and draft responses.	0.2	
5/9/2018	DWM	Review KES notes regarding depositions.	0.1	
5/9/2018	DWM	(Billing Judgment) Discuss pending motions w BBK.	0.0	0.2
5/9/2018	DWM	Review and respond to co-counsel correspondence regarding motions.	0.2	
5/9/2018	DWM	Discuss pending motions w GCG; review and respond to GCG e-mail.	0.2	
5/9/2018	DWM	Begin drafting opposition to defs.' mot.; discuss same w GCG.	1.5	
5/9/2018	FFV	(Billing Judgment) Print research materials for GCG and DM.	0.0	0.2
5/9/2018	FFV	(Billing Judgment) Transcribe insert to Carlson DEC.	0.0	0.3
5/9/2018	KES	Organize materials for preparation of opposition to motion to compel arbitration.	0.4	
5/9/2018	KES	Fact research (review depo transcripts of BKD PMK from other case).	0.9	
5/9/2018	KES	Update electronic files.	0.1	
5/9/2018	KES	Review emails with family members of Brookdale resident.	0.1	
5/10/2018	GCG	Research and revise letter to clients email co-counsel regarding same.	0.8	
5/10/2018	GCG	Email to co-counsel regarding motion to dismiss ADA claims and prior legal research for same.	0.3	
5/10/2018	GCG	Revise JC declaration IOT motion to compel.	0.3	
5/10/2018	GCG	Email to DM regarding legal research for opposition.	0.2	
5/10/2018	GCG	Legal research regarding arbitrations affordability cases.	0.3	
5/10/2018	BBK	Planning Opp to MTD.	0.2	
5/10/2018	BBK	Review GCG draft letter to clients.	0.1	
5/12/2018	DWM	Draft opposition to motion.	0.6	
5/13/2018	GCG	Revise Valletta and Carlson declarations; email co-counsel regarding same.	0.2	
5/13/2018	BBK	Review comm'ns w/ co-counsel and client regarding: declarations in support of Opposition to Motion to Compel Arbitration.	0.1	
5/13/2018	DWM	Draft opposition to motion.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/14/2018	GCG	Revise JC declaration IOT motion to compel arbitration; email to co-counsel regarding same and regarding LV decl.	0.3	
5/14/2018	GCG	Conf w/ JC regarding same.	0.1	
5/14/2018	GCG	Conf w/ and email to BBK regarding opposition to motion to dismiss.	0.2	
5/14/2018	GCG	Conf w/ DM regarding opposition to motion to compel.	0.2	
5/14/2018	BBK	Conference w/ GCG regarding: preparing Opposition to Motion to Dismiss SAC.	0.1	
5/14/2018	BBK	Researching & drafting Opposition to Motion to Dismiss SAC.	8.4	
5/14/2018	DWM	Review GCG and co-counsel emails regarding declarations.	0.1	
5/14/2018	DWM	Draft opposition.	0.5	
5/14/2018	DWM	Review GCG emails regarding declarations and motion.	0.1	
5/14/2018	DWM	Draft opposition.	4.6	
5/14/2018	KES	Review new client documents and update electronic files regarding same.	0.2	
5/14/2018	KES	Review rules relating to filing issues.	0.2	
5/15/2018	GCG	Research and revise oppositions to motions to compel and dismiss.	2.0	
5/15/2018	GCG	Conf w/ BBK and email to DM regarding same.	0.5	
5/15/2018	BBK	Drafting/revising portions of Opposition to Motion to Dismiss SAC.	4.0	
5/15/2018	BBK	Comm'ns w/ DWM/GCG and co-counsel regarding: status of briefing on Oppositions to Defendants' pending motions.	0.1	
5/15/2018	BBK	(Billing judgment) comm'ns w/ associates regarding: conducting cite-check of BBK's portions of Opposition to MTD SAC; break down assignment for JY/AS/JW.	0.0	0.2
5/15/2018	DWM	Discuss brief w GCG.	0.1	
5/15/2018	DWM	Draft opposition to motion to compel.	3.9	
5/15/2018	DWM	Review local rules and draft email regarding same.	0.2	
5/15/2018	DWM	Revise brief.	1.0	
5/15/2018	DWM	Review correspondence w co-counsel, GCG and BBK regarding motions.	0.1	
5/15/2018	DWM	Review and revise brief; draft emails regarding status of same to GCG, BBK, and KES.	0.5	
5/15/2018	JW	(Billing Judgment) Emails regarding cite-check.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 152

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2018	KES	Call from relative of Brookdale resident.	0.2	
5/16/2018	GCG	Research and revise draft opposition to motion to compel.	0.8	
5/16/2018	GCG	Emails to SC regarding Vallette declaration.	0.2	
5/16/2018	GCG	Revise oppositions to motions to dismiss and strike.	1.0	
5/16/2018	GCG	Emails to GW and team regarding same.	0.3	
5/16/2018	GCG	Conf w/ BBK regarding Winans - ADA issues and brief.	0.1	
5/16/2018	GCG	Emails to KES regarding class member issues.	0.2	
5/16/2018	AGS	(Billing Judgment) Cite check Opp to MTD; conf. with BBK re same.	0.0	2.1
5/16/2018	BBK	(Billing Judgment) comm'ns w/ JY, JW, and AS regarding: cite-checking BBK portions of Opp to MTD SAC.	0.0	0.2
5/16/2018	BBK	Revising/proof-reading BBK portions of Opp to MTD SAC.	2.0	
5/16/2018	BBK	Comm'ns w/ GCG regarding: her revisions to BBK portions of Opp to MTD SAC.	0.1	
5/16/2018	BBK	(Billing Judgment) comm'ns w/ WP regarding; Opp to MTD SAC.	0.0	0.2
5/16/2018	BBK	Review/revise SC edits to Opp to MTD SAC.	2.3	
5/16/2018	BBK	Comm'ns w/ GCG & co-counsel regarding: drafting/revising briefs and supporting Request for Judicial Notice and declarations.	0.2	
5/16/2018	BBK	Comm'ns w/ GCG & KES regarding: F/U w/ court-appointed guardian of named Plaintiff regarding: BD assertion of debt owed by him.	0.1	
5/16/2018	BBK	Review DWM's draft Opposition to Motion to Compel Arbitration.	0.3	
5/16/2018	JSY	(Billing Judgment) Cite check of brief.	0.0	0.9
5/16/2018	JW	(Billing Judgment) Cite check brief.	0.0	0.8
5/16/2018	KES	Call to/from representative of plaintiff and email to team regarding same.	0.3	
5/16/2018	KES	Online research regarding recent licensing complaints regarding Fountaingrove.	0.4	
5/16/2018	KES	Gather materials for appendix in opposition to motion to compel arbitration.	0.6	
5/16/2018	KES	Email to team regarding call from relative of Brookdale resident.	0.1	
5/16/2018	KES	Finalize declaration.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2018	GCG	Email w/ HF regarding Brookdale debt demand.	0.1	
5/17/2018	GCG	Conf w/ and email to KES regarding class member calls and follow up.	0.2	
5/17/2018	GCG	Conf w/ SC and DM regarding opposition briefs.	0.1	
5/17/2018	GCG	Email to GW regarding same.	0.1	
5/17/2018	GCG	Review and revise opp to motion to compel arbitration.	0.5	
5/17/2018	GCG	Confs and emails to DM and KES regarding same.	0.5	
5/17/2018	GCG	Revise appendix IOT motion to compel.	0.1	
5/17/2018	GCG	Conf w/ SG regarding Fountaingrove issues; draft memo to file regarding same.	0.2	
5/17/2018	DWM	Discuss briefs and next steps w GCG and co-counsel.	0.4	
5/17/2018	DWM	Review correspondence and suggestions regarding briefs from GCG, BBK, and co-counsel.	0.2	
5/17/2018	DWM	Discuss filing preparations w KES.	0.2	
5/17/2018	DWM	Review KES work on appendix docs.	0.1	
5/17/2018	DWM	Discuss class member contact w KES; review e-mail regarding same.	0.1	
5/17/2018	DWM	Review legal memo regarding arbitration agreements.	0.2	
5/17/2018	DWM	Review and revise brief.	0.8	
5/17/2018	DWM	Meet w GCG regarding edits to brief.	0.1	
5/17/2018	DWM	Discuss additional details regarding app'x w KES.	0.1	
5/17/2018	DWM	Revise brief.	3.5	
5/17/2018	DWM	Review Judge's standing order.	0.1	
5/17/2018	DWM	Perform final review of brief.	0.7	
5/17/2018	DWM	Perform final review of documents to final; discuss filing with GCG; manage filing.	0.5	
5/17/2018	KES	Prepare appendix to opposition to motion to compel arbitration; file opposition documents regarding same.	3.5	
5/17/2018	KES	TC and emails with relatives of Brookdale residents and update team regarding same.	1.5	
5/18/2018	GCG	Conf w/ DM regarding class member follow up and declarations.	0.2	
5/18/2018	GCG	Email to co-counsel regarding class arbitration issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/18/2018	GCG	Email to HT regarding repair issues.	0.1	
5/18/2018	DWM	Review and respond to client correspondence.	0.2	
5/18/2018	DWM	Review e-mails and calls from class members; discuss same w KES; respond to same.	0.3	
5/18/2018	DWM	Discuss next steps in Brookdale w GCG.	0.1	
5/18/2018	DWM	(Billing Judgment) Review and revise Brookdale to-do list.	0.0	0.3
5/18/2018	DWM	Review letter to clients.	0.1	
5/18/2018	FGL	Email from/to GCG regarding memo to file.	0.1	
5/18/2018	KES	Prepare and send courtesy copy of opposition to judge.	0.4	
5/18/2018	KES	Confer DWM regarding class member follow up.	0.1	
5/18/2018	KES	TC relative of former Brookdale resident and update master chart regarding same.	0.7	
5/18/2018	KES	Update electronic client files and review docs.	0.4	
5/18/2018	KES	Download and circulate oppositions to motions.	0.3	
5/20/2018	GCG	Email to SC and KES regarding class member documents.	0.1	
5/20/2018	GCG	(Billing Judgment) Email to HF.	0.0	0.1
5/21/2018	GCG	Review class certification declarations.	0.5	
5/21/2018	GCG	Confs w/ DM regarding same.	0.2	
5/21/2018	GCG	Emails w/ co-counsel regarding letter and reports on Fountaingrove.	0.5	
5/21/2018	GCG	(Billing Judgment) Emails to DM and KES regarding saving witness documents and researching complaints.	0.0	0.3
5/21/2018	BBK	Client comm'ns w/ GAL of plaintiff.	0.1	
5/21/2018	BBK	(Billing Judgment) review DWM case task list distributed 5/18.	0.0	0.1
5/21/2018	BBK	Comm'ns w/ DWM & GCG regarding: draft class cert declarations for GALs of named plaintiffs.	0.1	
5/21/2018	BBK	Comm'ns w/ GCG & DWM regarding: obtaining CA Department of Public Health report regarding: confirmed violations at Brookdale Fountaingrove reported by GAL of named plaintiff.	0.1	
5/21/2018	DWM	Review new supreme court case law on arbitration.	0.3	
5/21/2018	DWM	Review GCG correspondence w co-counsel and client.	0.1	
5/21/2018	DWM	Review e-mail from KES regarding class member call; draft response to same w next steps.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/21/2018	DWM	Review GCG comments on declaration and discuss same w GCG.	0.2	
5/21/2018	DWM	Review GCG correspondence regarding complaint; search state website; draft response.	0.2	
5/21/2018	DWM	Review and revise draft declarations; discuss same w class member.	1.7	
5/21/2018	DWM	Discuss outstanding motions w BBK.	0.2	
5/21/2018	KES	Follow up regarding phone call of relative of Brookdale resident.	0.2	
5/21/2018	KES	Update electronic client documents files.	0.4	
5/22/2018	GCG	Revise class cert declarations.	0.5	
5/22/2018	GCG	Confs w/ MWB, SJR and DM regarding further legal research.	0.4	
5/22/2018	GCG	Conf w/ GW and SC regarding SAC and July 12 hearing.	0.3	
5/22/2018	GCG	Revise letter; email w/ SC regarding same.	0.5	
5/22/2018	GCG	Conf w/ DM regarding class member.	0.1	
5/22/2018	SJR	(Billing Judgment) Conference with MWB; review GG letter regarding claims.	0.0	0.5
5/22/2018	SJR	(Billing Judgment) Conferences with GG regarding same.	0.0	0.4
5/22/2018	BBK	Review DWM's draft class cert declarations circulated to RBGG team.	0.2	
5/22/2018	BBK	(Billing Judgment) reviewing GCG draft letter.	0.0	0.1
5/22/2018	DWM	(Billing Judgment) Discuss arbitration issues w MLF.	0.0	0.1
5/22/2018	DWM	Discuss documents in file w GCG.	0.1	
5/22/2018	DWM	Review research assignment from GCG as well as memo regarding starting point.	0.1	
5/22/2018	DWM	Discuss process for declarations w GCG.	0.3	
5/22/2018	DWM	Review filed briefs.	1.3	
5/22/2018	DWM	Review and revise declaration.	0.3	
5/22/2018	DWM	Conduct phone call with prospective class member; prepare for call; send follow up e-mail.	0.4	
5/23/2018	GCG	Conf w/ and emails to DM regarding revisions to class cert. declarations and conversation w/ putative class member.	0.2	
5/23/2018	GCG	Revise and send Schmidt collection letter; conf w/ KES regarding same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/23/2018	DWM	Discuss case projects w GCG; add notes from meeting to tasks list.	0.2	
5/23/2018	DWM	Draft e-mail to class member.	0.1	
5/23/2018	DWM	Conduct phone call with potential class member.	0.1	
5/23/2018	DWM	(Billing Judgment) Review filed brief.	0.0	1.0
5/23/2018	DWM	Conduct call with representative of putative class member.	0.3	
5/23/2018	DWM	Review and revise declarations, templates, memos and tracker.	2.8	
5/23/2018	KES	Email w relative of Brookdale resident.	0.2	
5/23/2018	KES	Finalize and send electronic and hard copies of letter regarding Schmidt.	0.4	
5/24/2018	DWM	Review documents and correspondence from prospective class member; draft response.	0.2	
5/24/2018	DWM	Discuss declaration collection w BBK.	0.1	
5/24/2018	DWM	Perform research regarding theories of liability.	0.6	
5/24/2018	KES	Update client documents files.	0.4	
5/25/2018	GCG	Conf w/ BBK, DM and KES re class member declarations and outreach.	0.1	
5/25/2018	GCG	Draft memo to file re call from CM at Palm Springs.	0.1	
5/25/2018	GCG	Email to SC re same and re meeting to discuss.	0.1	
5/25/2018	BBK	(Billing Judgment) reviewing DWM's distributed weekly case task list.	0.0	0.1
5/25/2018	BBK	RBGG team case meeting.	0.2	
5/25/2018	BBK	Comm'ns w/ S. Colby regarding: F/U on call from Palm Springs resident.	0.1	
5/25/2018	DWM	Review KES e-mail regarding class member contact; call class member; discuss same w KES.	0.2	
5/25/2018	DWM	Review and update case to-do list.	0.1	
5/25/2018	DWM	Prepare for meeting and meet w GCG, BBK, and KES regarding case updates and next steps.	0.3	
5/25/2018	DWM	Review co-counsel emails regarding class member contacts.	0.1	
5/25/2018	KES	(Reduced Charge) Team case status meeting.	0.2	0.1
5/25/2018	KES	Follow up regarding email to relative of Brookdale resident.	0.1	
5/26/2018	GCG	(Billing Judgment) Emails to SJR re research and letter.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
5/26/2018	SJR	(Billing Judgment) Revise letter to class representatives and emails.	0.0	1.2
5/28/2018	GCG	Conf w/ and email to potential class member re Brookdale Palm Springs.	0.4	
5/28/2018	GCG	Emails to co-counsel re same.	0.1	
5/28/2018	GCG	Review and revise letter to clients re status of case.	0.3	
5/28/2018	GCG	Emails to SJR and MWB re same.	0.2	
5/28/2018	SJR	(Billing Judgment) Review and revise letter to class representatives; emails with GG.	0.0	0.6
5/30/2018	GCG	Conf w/ DM re legal research and class cert declarations.	0.1	
5/30/2018	DWM	Review GCG and co-counsel emails regarding class member contact; update tracking chart.	0.2	
5/30/2018	DWM	Discuss case updates and next steps w GCG.	0.1	
5/30/2018	DWM	Perform legal research regarding relevant federal statutes and regulations; draft memo regarding same.	1.9	
5/31/2018	DWM	Review order regarding transcript; attempt to access; draft e-mail regarding same.	0.1	
5/31/2018	DWM	Review government website for updated complaint information.	0.1	
5/31/2018	DWM	Perform legal research; draft, review, and revise legal research memo; transmit to GCG.	2.2	
5/31/2018	DWM	Discuss legal research with MWB; draft follow-up email to GCG.	0.3	
5/31/2018	DWM	Perform legal research following conversation w MWB.	1.6	
6/1/2018	DWM	(Billing Judgment) Review news report relevant to case.	0.0	0.1
6/1/2018	DWM	Perform legal research and augment existing memo.	1.1	
6/1/2018	FFV	(Billing Judgment) Download, save to the DMS and circulate article re evacuation procedures.	0.0	0.3
6/4/2018	SJR	(Billing Judgment) Conference with GG re next steps.	0.0	0.4
6/4/2018	DWM	(Billing Judgment) Discuss research updates w GCG.	0.0	0.1
6/4/2018	DWM	Review class member correspondence and legal materials; update tracker.	0.2	
6/4/2018	DWM	Review legal research from co-counsel.	0.1	
6/5/2018	BBK	Reviewing case forwarded by S. Colby supporting certification of BD class.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/5/2018	DWM	Discuss case updates and upcoming tasks w KES.	0.1	
6/5/2018	DWM	Conduct phone call w class member's representative; review memos re previous communications.	1.0	
6/5/2018	KES	Review court notice re transcript and email court reporter re same.	0.2	
6/5/2018	KES	Review document from relative of Brookdale resident.	0.2	
6/6/2018	DWM	(Billing Judgment) Review KES e-mails re court hearing and class member correspondence; discuss matter w KES and send follow-up e-mail; review filing.	0.0	0.2
6/6/2018	DWM	Perform add'l legal research; review and revise memos.	1.4	
6/6/2018	KES	Review email from court reporter re transcript, prepare and file order form.	0.4	
6/6/2018	KES	Email to relative of Brookdale re residency agreement.	0.2	
6/7/2018	GCG	Conf w/ DM re defendants' reply to opp to compel arbitration.	0.1	
6/7/2018	BBK	Reviewing/analyzing Replies filed by BD in support of Motion to Dismiss, Motion to Strike, and Motion to Compel Arbitration.	1.1	
6/7/2018	DWM	Discuss research w GCG; review, revise, and combine research memos.	0.8	
6/7/2018	DWM	Circulate and review Defs.' filing.	0.3	
6/7/2018	DWM	Discuss filing w GCG.	0.1	
6/8/2018	GCG	Confs w/ BBK and DM re defendants' reply brief.	0.2	
6/8/2018	BBK	Conferring w/ DWM re: reply briefs filed by Brookdale.	0.2	
6/8/2018	BBK	Conferring w/ GCG re: reply briefs filed by Brookdale.	0.1	
6/8/2018	DWM	(Reduced Charge) Discuss reply briefing w BBK.	0.2	0.2
6/8/2018	DWM	Review defs.' new court filings.	2.3	
6/8/2018	DWM	Discuss review of filings w GCG.	0.1	
6/8/2018	KES	Arrange for check and draft and send letter to court reporter for transcript.	0.4	
6/8/2018	KES	Prepare copies of reply briefs in preparation for hearing.	0.3	
6/9/2018	GCG	Review and analyze defendants' arbitration reply.	0.3	
6/9/2018	DWM	(Billing Judgment) Review relevant news coverage.	0.0	0.1
6/10/2018	GCG	Email w/ potential witness.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/11/2018	BBK	Review outreach from child of Brookdale Paso Robles resident.	0.1	
6/11/2018	DWM	Review class member correspondence w GCG.	0.1	
6/11/2018	DWM	Prepare for and conduct class member phone call.	0.1	
6/11/2018	KES	Review emails and documents from relative of Brookdale resident.	0.3	
6/12/2018	GCG	Conf w/ DM re class member interview.	0.1	
6/12/2018	DWM	Conduct class member interview.	2.3	
6/12/2018	DWM	Discuss class member communications w KES and GCG.	0.2	
6/13/2018	GCG	Emails to GW and SC and team re meeting to discuss reply briefs and class cert declarations.	0.1	
6/13/2018	BBK	Comm'ns w/ co-counsel re: pending motions and preparations for class certification.	0.1	
6/13/2018	DWM	Review correspondence w co-counsel.	0.1	
6/13/2018	DWM	Compose draft response letter template for class members; discuss same w KES.	0.6	
6/14/2018	GCG	Email to GW re replies.	0.1	
6/15/2018	GCG	Email to DS and team re admin motion transcript; initial review of same.	0.1	
6/17/2018	GCG	Review and analyze defendants' replies ISO motions to strike and dismiss.	1.0	
6/18/2018	DWM	Review hearing transcript.	0.2	
6/18/2018	DWM	Review class member communication; discuss same w KES; draft response.	0.3	
6/18/2018	KES	Email relative of Brookdale resident and confer DWM re same.	0.3	
6/18/2018	KES	Review draft template response for Brookdale callers.	0.1	
6/20/2018	DWM	Review client correspondence and update from KES.	0.1	
6/20/2018	DWM	Respond to class member correspondence.	0.1	
6/20/2018	KES	Review email from relative of Brookdale resident and update master chart re same.	0.2	
6/22/2018	GCG	Team meeting to discuss class member contacts and declaration drafting.	0.2	
6/22/2018	GCG	Draft email to co-counsel re same and re preparation for oral argument.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/22/2018	BBK	(Billing Judgment) conferring w/ RBGG team re: check-in meeting.	0.0	0.1
6/22/2018	BBK	Weekly check-in meeting.	0.1	
6/22/2018	DWM	Conduct call with prospective class member.	0.2	
6/22/2018	DWM	Meet w case team re updates and tasks.	0.2	
6/22/2018	DWM	Review class member communications and supplement declaration notes.	0.3	
6/22/2018	KES	Team meeting re case status.	0.2	
6/22/2018	KES	Update master tracking chart and prepare for meeting.	0.5	
6/22/2018	KES	Review new client document and update electronic file re same.	0.1	
6/25/2018	GCG	Conf w/ DM re potential additional claims.	0.1	
6/25/2018	DWM	Perform legal research; draft memo re new facts and existing causes of action.	0.7	
6/25/2018	DWM	Review relevant portions of complaint and class member interview notes; draft portions of declaration.	2.1	
6/25/2018	DWM	Discuss new facts from class member w GCG.	0.2	
6/26/2018	GCG	Prepare for and conduct conference w/ GW, SC, GK and DM re preparation for oral argument.	0.8	
6/26/2018	GCG	Follow up email re ADA argument.	0.1	
6/26/2018	GCG	Conf w/ SG re Fountaingrove issues.	0.2	
6/26/2018	GCG	Email w/ KES re state licensing complaints.	0.1	
6/26/2018	GCG	Draft memo to file re conversation w/ SG.	0.1	
6/26/2018	BBK	Reviewing KES report re call w/ potential declarant.	0.1	
6/26/2018	DWM	Participate in calls w GCG re co-counsel and class member contact.	0.1	
6/26/2018	DWM	Review KES and GCG e-mails re complaints.	0.1	
6/26/2018	DWM	Participate in conference call w co-counsel and meet w GCG.	0.8	
6/26/2018	DWM	Review KES memo re class member call.	0.1	
6/26/2018	DWM	Review materials in case file; draft e-mail to co-counsel.	0.6	
6/26/2018	KES	TC with relative of former Brookdale resident and draft and circulate memo to team re same.	0.8	
6/26/2018	KES	Review DSS for updates re sanctions against Fountaingrove.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/27/2018	GCG	Email to GW re oral argument preparation and recent calls from class members; forward memos to file.	0.3	
6/27/2018	DWM	Review GCG e-mail and memo.	0.1	
6/27/2018	KES	Gather and organize materials for oral argument prep for motion to compel arbitration.	1.0	
6/27/2018	KES	Calendar case meeting.	0.1	
6/27/2018	KES	Review email re client conversation.	0.1	
6/28/2018	GCG	Conference with BBK re: oral argument moot.	0.1	
6/28/2018	GCG	Conference with DM re: interlocutory appeals and oral argument strategy.	0.2	
6/28/2018	GCG	Prepare for oral argument.	0.1	
6/28/2018	BBK	Conferring w/ GCG re moot oral argument.	0.1	
6/28/2018	BBK	Reviewing DWM report re potential for interlocutory appeal by Defendants on motion to compel.	0.1	
6/28/2018	DWM	Review memo and relevant statutes; draft e-mail to co-counsel.	0.5	
6/28/2018	DWM	Review e-mail from co-counsel and document in file.	0.1	
6/28/2018	KES	Gather new cases cited in renewed motion to compel arbitration briefs and mark cites; organize briefing materials for oral argument.	5.0	
6/29/2018	GCG	Prepare for oral argument.	0.1	
6/29/2018	GCG	Email with potential witness.	0.1	
6/29/2018	DWM	Review documents in file; draft declaration.	0.7	
6/29/2018	DWM	Review class member correspondence.	0.1	
6/29/2018	KES	Complete organization of materials for hearing on motion to compel arbitration.	1.3	
6/29/2018	KES	Update master tracking chart with information from new contacts.	0.3	
6/30/2018	GCG	Review and analyze defendants' motion to compel and cases.	1.5	
7/1/2018	GCG	Review and analyze defendants' cases in support of motion to compel arbitration.	1.8	
7/1/2018	GCG	Begin draft of oral argument outline.	0.3	
7/2/2018	KES	Organize materials for oral argument on motions to dismiss/strike.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/3/2018	GCG	Review and analyze plaintiffs' opposition pleadings regarding arbitration.	0.5	
7/3/2018	KES	Review materials to provide to co-counsel for oral argument prep.	0.2	
7/4/2018	GCG	Review and analyze cases cited in plaintiffs' opposition to motion to compel.	0.3	
7/5/2018	GCG	Review cases and pleadings in support of and opposition to defendants' motions; prepare for moot.	0.5	
7/5/2018	GCG	Emails to BBK and KES regarding same.	0.1	
7/5/2018	GCG	Revise oral argument outline.	0.1	
7/5/2018	KES	Online case research in preparation for oral argument and organize additional materials in connection with oral argument prep.	1.1	
7/6/2018	GCG	(Reduced Charge) Travel to and from co-counsel's office to participate in moot court of oral argument on motions to dismiss, strike and compel.	0.6	0.7
7/6/2018	GCG	Research other ADA cases.	0.1	
7/6/2018	GCG	Participate in moot court of oral argument on motions to dismiss, strike and compel.	2.1	
7/6/2018	BBK	Travel to Schneider Wallace offices for moot oral argument.	0.8	
7/6/2018	BBK	Conducting moot oral argument (w/ GCG, G. Wallace, S. Colby).	2.1	
7/6/2018	BBK	(Billing Judgment) travel to RBGG from Schneider Wallace after moot oral argument.	0.0	0.4
7/6/2018	KES	Update electronic files.	0.1	
7/7/2018	GCG	Review and analyze cases and briefs regarding motion to compel arbitration.	1.6	
7/7/2018	GCG	Draft oral argument outline.	0.5	
7/7/2018	GCG	Review transcript of oral argument on motion to dismiss before Judge Gilliam; email to GW and team regarding same.	0.5	
7/7/2018	GCG	Emails to DM regarding follow up research.	0.2	
7/7/2018	GCG	Fact research regarding Brookdale evacuation policy.	0.1	
7/7/2018	BBK	Reviewing transcript of hearing on MTD CLRA/UCL claims before Judge Gilliam.	0.2	
7/8/2018	GCG	Review and analyze defendants' reply brief and cases cited therein.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/9/2018	GCG	Review and analyze cases cited in opposition to defendants' motion to arbitrate.	1.0	
7/9/2018	GCG	Conf w/ and email to DM regarding same.	0.2	
7/9/2018	GCG	Revise oral argument.	0.2	
7/9/2018	GCG	Email to JC regarding HC stay in memory case.	0.1	
7/9/2018	GCG	Legal and factual research; emails to KES and SC regarding same.	0.4	
7/9/2018	GCG	Email w/ GW regarding oral argument preparation.	0.1	
7/9/2018	BBK	Reviewing DWM research on cases relied upon by Defendants in Reply ISO Motion to Compel Arbitration.	0.1	
7/9/2018	DWM	Review hearing transcript; review co-counsel e-mails; draft and save memo regarding same; review new case law and relevant rules.	1.3	
7/9/2018	DWM	Discuss updates from co-counsel meeting and prep for argument w BBK.	0.2	
7/9/2018	DWM	Review correspondence from GCG; perform legal research; draft e-mail with findings.	0.5	
7/9/2018	DWM	Review filings to prepare for meeting w GCG.	0.1	
7/9/2018	DWM	(Reduced Charge) Meet w GCG regarding oral argument.	0.2	0.1
7/9/2018	DWM	Perform legal research and draft e-mail to GCG.	1.1	
7/9/2018	KES	Update electronic research files.	0.2	
7/10/2018	GCG	Conf w/ JC regarding conditions at Fountaingrove.	0.2	
7/10/2018	GCG	Review cases cited by defendants in support of motion to compel.	0.6	
7/10/2018	GCG	Conf w/ and emails to DM regarding reply cases and oral argument preparation.	0.5	
7/10/2018	GCG	Revise oral argument outline.	0.2	
7/10/2018	DWM	(Billing Judgment) Review GCG and co-counsel emails and news coverage.	0.0	0.1
7/10/2018	DWM	(Reduced Charge) Discuss oral argument prep w GCG.	0.5	0.1
7/10/2018	DWM	Perform legal research and draft memo to assist w oral argument prep.	3.2	
7/10/2018	FFV	(Billing Judgment) Download and save to the DMS emailed article.	0.0	0.1
7/10/2018	KES	Update electronic research file.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/11/2018	GCG	Review and analyze cases cited in opposition and reply briefs.	2.0	
7/11/2018	GCG	Confs w/ GW and DM regarding oral argument issues.	0.2	
7/11/2018	GCG	Review DM research memorandum regarding reply cases.	0.2	
7/11/2018	GCG	Email from DM regarding BJH report on conditions at Santa Cruz facility.	0.2	
7/11/2018	GCG	Revise oral argument outline.	0.7	
7/11/2018	DWM	(Billing Judgment) Discuss case w MN.	0.0	0.2
7/11/2018	DWM	Perform legal research and update memo.	1.0	
7/11/2018	DWM	(Reduced Charge) Discuss oral argument prep w GCG.	0.2	0.3
7/11/2018	DWM	Discuss oral argument prep w KES.	0.2	
7/11/2018	DWM	Conduct call w client; draft memo regarding same.	0.4	
7/11/2018	KES	Gather additional materials for hearing prep.	0.4	
7/11/2018	KES	Assist with organization of hard copy pleadings for hearing.	1.0	
7/11/2018	KES	Update electronic research file.	0.1	
7/12/2018	GCG	Review and analyze cases cited in motion to compel arbitration briefs.	2.0	
7/12/2018	GCG	Revise oral argument outline.	0.5	
7/12/2018	GCG	Confs w/ DM regarding caselaw and argument and class cert declaration.	0.2	
7/12/2018	GCG	(Reduced Charge) Travel to conduct oral argument w/ GW regarding motions to compel, dismiss and strike.	0.5	0.5
7/12/2018	GCG	Email w/ SG regarding next Family Council meeting.	0.1	
7/12/2018	GCG	Conduct oral argument w/ GW regarding motions to compel, dismiss and strike.	2.1	
7/12/2018	BBK	Conferring w/ DWM regarding oral argument.	0.1	
7/12/2018	DWM	Discuss oral argument prep w GCG and conduct legal research.	0.2	
7/12/2018	DWM	(Billing Judgment) Travel to, attend, and return from court hearing.	0.0	3.0
7/12/2018	DWM	(Billing Judgment) Discuss hearing w BBK and LAE.	0.0	0.2
7/13/2018	GCG	Email w/ SC regarding arbitration agreement.	0.1	
7/13/2018	GCG	Review court's minutes order regarding hearing.	0.1	
7/13/2018	BBK	Conferring w/ JY regarding case.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/13/2018	DWM	Review case docket activity.	0.1	
7/13/2018	DWM	Discuss case w JSY.	0.2	
7/13/2018	JSY	Conf. w/ GCG, BBK, DM regarding case.	0.2	
7/13/2018	KES	Review court notice and update electronic files.	0.1	
7/16/2018	BBK	Reviewing DWM's draft template reply to prospective class members and families who contact us.	0.1	
7/16/2018	DWM	Discuss class member inquiry w KES; research related doc; send doc and e-mail to GCG, KES, and BBK.	0.4	
7/16/2018	KES	Tcs with relative of putative class member regarding additional issues at Brookdale, case status.	0.8	
7/17/2018	GCG	Review DM memorandum to file regarding class member interviews.	0.1	
7/17/2018	DWM	Discuss case status w KES.	0.1	
7/18/2018	DWM	Review correspondence from class member; review draft response and discuss same w KES.	0.1	
7/18/2018	JSY	Reviewed case documents.	2.0	
7/18/2018	KES	Draft and send letter to relative of Brookdale resident w copy of complaint.	0.3	
7/19/2018	GCG	Research and revise letter to clients re status of case claims.	0.2	
7/19/2018	GCG	Email to SJR re same.	0.1	
7/19/2018	GCG	Conf w/ SG re situation at Fountaingrove; lack of staffing.	0.2	
7/19/2018	GCG	Review and analyze 9th Circuit decision on class certification.	0.2	
7/19/2018	SJR	(Billing Judgment) Revise letter to clients.	0.0	0.6
7/19/2018	KES	(Billing Judgment) Online research.	0.0	0.1
7/20/2018	GCG	Revise letter to clients re case status.	0.1	
7/20/2018	GCG	Email to GW and team re same.	0.1	
7/20/2018	GCG	Email to DM re witness call.	0.1	
7/20/2018	GCG	Email from JY re ADA issues.	0.1	
7/20/2018	BBK	Reviewing DWM report regarding contact from potential witness.	0.1	
7/20/2018	DWM	Conduct brief call with potential witness interested in case; update tracker and draft e-mail to GCG regarding same.	0.3	
7/20/2018	DWM	Discuss case w JSY.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/20/2018	DWM	Conduct call w witness; update tracker w notes.	0.4	
7/20/2018	FGL	Confer with LHW and AGS re exhibits and research/organize same.	1.0	
7/23/2018	BBK	Reviewing recent 9th Cir opinion in True Health v McKesson w/ relevant holdings on class cert reqs.	0.2	
7/23/2018	BBK	Reviewing GCG's draft letter to plaintiffs re claims in SAC and S. Colby's redlines thereto.	0.1	
7/24/2018	DWM	Discuss meeting preparation and questions w JSY.	0.1	
7/24/2018	DWM	Prepare for meeting w JSY and update case task tracker.	0.4	
7/24/2018	DWM	Review factual research materials from colleague.	0.1	
7/24/2018	JSY	Review case documents.	4.0	
7/24/2018	KES	Review email re call from potential witness.	0.1	
7/25/2018	DWM	Discuss case w co-counsel.	0.1	
7/25/2018	DWM	Discuss case w JSY.	0.4	
7/25/2018	JSY	Review case documents.	0.8	
7/25/2018	JSY	(Reduced Charge) Mtg. with DWM re transition of case.	0.4	0.1
7/25/2018	JSY	Review memos from DWM re legal issues.	0.2	
7/26/2018	BBK	(Billing Judgment) reviewing article by prospective assisted living facility staffing expert analyzing for-profit nursing home facility staffing.	0.0	0.4
7/26/2018	DWM	Call clients to introduce JSY.	0.6	
7/26/2018	DWM	Discuss case details and transition w JSY.	0.8	
7/26/2018	DWM	Prepare and circulate notice.	0.2	
7/26/2018	DWM	Conduct call w client and JSY.	0.2	
7/26/2018	JSY	Conf. w/ DM re transition issues and background of case.	0.8	
7/26/2018	JSY	Class rep. phone calls with DM.	0.6	
7/27/2018	GCG	Confs w/ DM and JY re conversations w/ named plaintiffs; review memorandum to file re same.	0.2	
7/27/2018	DWM	Discuss case transition w client.	0.1	
7/27/2018	DWM	Discuss case transition and client calls w GCG and draft e-mail re same.	0.2	
7/27/2018	JSY	Conf. w/ GCG re class representative communications.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/28/2018	GCG	Review documents provided by class members; email KES re same.	0.1	
7/29/2018	GCG	Review communications from potential class members; update file.	0.2	
7/29/2018	GCG	Attend to substitution of counsel.	0.1	
7/29/2018	GCG	Revise letter to named plaintiffs re status of case.	0.1	
7/29/2018	SJR	(Billing Judgment) Emails with GG; review letters to class representatives.	0.0	0.3
7/30/2018	GCG	Review and approve notice of JY appearance.	0.2	
7/30/2018	GCG	Revise and send letters to named plaintiffs PL, HF, BJ-H and JC re status of case.	0.3	
7/30/2018	GCG	Review Family Council minutes; emails to SG and KES re same.	0.1	
7/30/2018	GCG	Emails to co-counsel re same.	0.1	
7/30/2018	DWM	Correspond w GCG and JSY re class member contact and prospective filing.	0.4	
7/30/2018	DWM	Review JSY e-mail and local rules; revise draft filing.	0.2	
7/30/2018	JSY	Emails re notice of appearance.	0.1	
7/30/2018	JSY	Emails re call from class member.	0.1	
7/30/2018	JSY	Emails re substitution of counsel fling; researched same; reviewed same.	0.2	
7/30/2018	FFV	(Billing Judgment) Save staffing article by Charlene to the DMS.	0.0	0.1
7/30/2018	FFV	Mail letters to JC, BJH, PSL, RS re update on the case.	0.3	
7/30/2018	FFV	(Reduced Charge) Revise ltrs to HF and PSL; mail four letters.	0.3	0.7
7/30/2018	KES	Review and organize new client documents.	0.3	
7/31/2018	GCG	Revise and send letter to ML re status of case.	0.1	
7/31/2018	JSY	Conf. w/ DWM re notice of substitution of counsel.	0.1	
8/1/2018	DWM	Review and respond to e-mail regarding class member contact; discuss same w KES.	0.1	
8/1/2018	KES	Review email and documents sent by relative of Brookdale resident; update electronic files.	0.4	
8/2/2018	BBK	Reviewing recent California Court of Appeals decision on arbitration clause enforceability (Williams v. Atria Las Posas).	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/2/2018	BBK	(Billing Judgment) reviewing RBGG team communications regarding finalizing and filing substitution of counsel (JY for DWM).	0.0	0.1
8/2/2018	JSY	Emails regarding notice regarding change in counsel.	0.1	
8/3/2018	BBK	Reviewing S. Colby report on article regarding Brookdale facility sales and potential impact on case.	0.1	
8/7/2018	JSY	Finalized and filed substitution of counsel.	0.3	
8/7/2018	KES	Confer GCG regarding class member/witness calls.	0.1	
8/20/2018	GCG	Conf w/ KES re class member call and drafting declaration.	0.1	
8/20/2018	KES	TC relative of Brookdale resident.	0.4	
9/4/2018	GCG	Email w/ SC and team re sale of certain Brookdale facilities.	0.1	
9/10/2018	GCG	Emails to JC and team re new agreement by Brookdale w/ REIT at Fountaingrove.	0.2	
9/10/2018	BBK	Conferring w/ GCG and co-counsel re import of notice to BD Fountaingrove residents re upcoming change in licensee for community.	0.1	
9/10/2018	KES	Voicemail from relative of former Brookdale resident.	0.1	
9/13/2018	GCG	Continued review of Brookdale documents re REITs.	0.1	
9/13/2018	GCG	Email SC and team re call to discuss status and next steps.	0.1	
9/13/2018	GCG	Conference with BBK, JY re call to discuss status and next steps.	0.1	
9/13/2018	JSY	Conf. w/ GCG and BBK re next steps.	0.1	
9/13/2018	KES	Update electronic research file.	0.1	
9/17/2018	GCG	Conf w/ KS, SC and team re REIT issues and class certification.	0.4	
9/17/2018	GCG	Follow up conf w/ JY and BBK re same.	0.1	
9/17/2018	BBK	Co-counsel conference call w/ GCG & JY.	0.3	
9/17/2018	BBK	Post- co-counsel conference call meeting w/ GCG and JY.	0.1	
9/17/2018	JSY	Conf. call with team re next steps.	0.5	
9/19/2018	GCG	Review SC comments on and revisions to draft class cert declarations.	0.1	
9/19/2018	GCG	Email to SC and team re same.	0.1	
9/19/2018	BBK	Reviewing draft class certification declarations & S. Colby's comments thereon.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/1/2018	GCG	Emails to SC, JY and ML re death of Edward Boris.	0.2	
10/1/2018	BBK	Reviewing communications w/ team and client re death of named Plaintiff.	0.1	
10/1/2018	JSY	Emails re E. Boris's death.	0.1	
10/1/2018	FFV	Save death certificate to the DMS.	0.1	
10/2/2018	GCG	Email to JY re deceased plaintiff.	0.1	
10/3/2018	JSY	Conf. w/ GCG re effect of death of class rep; LM for SC re same; emailed SC re same.	0.3	
10/11/2018	GCG	Conf w/ and email to SG.	0.2	
10/15/2018	JSY	Emails re successor in interest declaration.	0.1	
10/15/2018	KES	Finalize and file notice of change of address.	0.2	
10/16/2018	JSY	Emails re successor in interest declaration.	0.1	
10/18/2018	GCG	Conf w/ JY re steps needed in light of plaintiff Boris' death.	0.1	
10/18/2018	JSY	Conf. w/ GCG re same; LM for M. Lytle re same.	0.1	
10/18/2018	JSY	Emails re SII declarations; reviewed samples.	0.2	
10/18/2018	JSY	T/C with G. Kawamoto re successor in interest declaration.	0.5	
10/22/2018	GCG	Email from putative class member on Southern California.	0.1	
10/22/2018	GCG	Conf w/ JY re email w/ GW and team re interview of class member.	0.2	
10/22/2018	BBK	Reviewing JY's notes re call w/ daughter of prospective class member at Brookdale facility in Westminster.	0.1	
10/22/2018	JSY	Emails re contact from new potential plaintiff; conf. w/ GCG re same; t/c with new potential plaintiff's daughter; draft memo re same.	1.3	
10/23/2018	JSY	T/C with daughter of resident; emails re same.	0.5	
10/23/2018	JSY	Emails with resident.	0.1	
10/24/2018	GCG	Confs w/ SC and JY re class member in wheelchair.	0.3	
10/24/2018	JSY	Emails with class member.	0.2	
10/24/2018	JSY	Conf. w/ GCG re possible PI motion.	0.1	
10/25/2018	JSY	T/C with M. Lytle re estate plan for E. Boris; reviewed trust; emails re same.	0.2	
10/26/2018	GCG	Emails to SC, JY and KES re motion for preliminary injunction.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/26/2018	GCG	Conf w/ JY re arbitration clause and injunctive relief.	0.1	
10/26/2018	BBK	Reviewing JY's notes re call w/ prospective class member at Brookdale's Westminster facility.	0.1	
10/26/2018	JSY	T/C with J. Algarme; drafted notes re same; emails with team re same.	1.3	
10/26/2018	JSY	Analyze trust document for E. Boris.	0.2	
10/26/2018	KES	Research re case involving preliminary injunction.	0.3	
10/29/2018	GCG	Conf w/ SG re Fountaingrove.	0.1	
10/29/2018	GCG	Review JY email re arbitration agreement.	0.1	
10/29/2018	FFV	(Billing Judgment) Save to the DMS article re Nevarez v. 49rs.	0.0	0.1
10/31/2018	GCG	Draft memo to file re Fountaingrove report from SG.	0.2	
11/1/2018	GCG	Confs w/ and emails to named plaintiffs re status of case.	0.4	
11/1/2018	KES	Review emails re case status.	0.1	
11/16/2018	JSY	Emails re documents from potential declarant.	0.1	
11/21/2018	BBK	Reviewing update from H. Coulsen.	0.1	
11/29/2018	KES	Update electronic files.	0.1	
12/1/2018	GCG	Email to JC re Brookdale fee increases and care of named plaintiff.	0.2	
12/4/2018	JSY	Emails with class member JA.	0.1	
12/6/2018	GCG	Emails to SC re next steps.	0.1	
12/6/2018	BBK	Conferring w/ JY/KES re F/U w/ intake from family member of CA BD resident; reviewing article re CA superior court lawsuit against BD's facilities.	0.1	
12/6/2018	JSY	Emails with J. Algarme re setting up phone call.	0.1	
12/6/2018	JSY	Conf. w/ BBK re intake; emails re same.	0.1	
12/9/2018	GCG	Review information from SC re corporate structure; email to BBK and team re same.	0.1	
12/10/2018	JSY	T/C with J. Algarme re recent developments.	0.4	
12/10/2018	KES	Follow up email to relative of Brookdale resident.	0.1	
12/11/2018	GCG	Conf w/ SC re connecting w/ named plaintiffs.	0.2	
12/11/2018	GCG	Confs w/ JY re potential new plaintiff.	0.2	
12/11/2018	JSY	Review documents re J. Algarme.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/11/2018	JSY	Conf. w/ GCG re same.	0.2	
12/12/2018	KES	TC with fiduciary for Brookdale resident and draft memo re same.	0.6	
12/13/2018	JSY	Emails re intake call re Brookdale facility.	0.1	
12/13/2018	KES	(Billing Judgment) TC with relative of South Carolina Brookdale resident and email to team re same.	0.0	0.4
12/14/2018	BBK	Reviewing KES reports re calls w/ family members of California Brookdale residents.	0.1	
12/17/2018	GCG	Emails to KES and team re calls w/ class members.	0.5	
12/17/2018	KES	Telephone conference with clients and email team re same.	0.3	
12/17/2018	KES	Telephone call and email with representative of Brookdale resident.	0.3	
12/17/2018	KES	Follow up with team re status of call re Brookdale.	0.1	
12/18/2018	GCG	Conf w/ KS re status.	0.1	
12/18/2018	GCG	Email to KES and team re potential witnesses.	0.1	
12/18/2018	KES	Review email re status of class rep. calls.	0.1	
12/27/2018	GCG	Factual research; email JY and team re same.	0.1	
12/27/2018	FFV	(Billing Judgment) Download, pdf and save to the DMS/Fact/Research emailed articles.	0.0	0.3
1/2/2019	GCG	Email to KES and team re potential class rep.	0.1	
1/4/2019	GCG	Conf w/ KES re call w/ class member family member.	0.1	
1/4/2019	KES	Telephone call with relative of former Brookdale resident and follow up email re same.	0.5	
1/4/2019	KES	Review status of communications with potential witnesses and update master tracking chart re same.	0.7	
1/7/2019	GCG	Attend to class member call.	0.1	
1/8/2019	BBK	Reviewing communications between GCG/KES/JY re F/U with family member of Brookdale resident.	0.1	
1/8/2019	JSY	Emails re intake call.	0.1	
1/8/2019	KES	Email team re follow up call to relative of Brookdale resident.	0.1	
1/9/2019	JSY	T/C with potential class member; emails re same.	0.4	
1/10/2019	GCG	Conf w/ SG re Fountaingrove issues.	0.1	
1/10/2019	GCG	Emails w/ JC re same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 172

SERVICES

Date	Person	Description of Services	Hours	Discount
1/10/2019	GCG	Research and draft letter to opposing counsel re ongoing delays.	0.1	
1/11/2019	GCG	Research and draft letter to opposing counsel re need to open discovery.	0.7	
1/11/2019	GCG	Email w/ co-counsel re same.	0.2	
1/11/2019	GCG	Email to JC re HC.	0.1	
1/11/2019	BBK	Reviewing GCG draft letter to Defendants requesting relief from stipulation to stay discovery in light of lengthy period post-motions hearing & approval to send from co-counsel.	0.1	
1/14/2019	GCG	Research and revise letter to AK and JB re Rule 26 conference.	0.5	
1/14/2019	GCG	Confs w/ and emails to KES re client files.	0.2	
1/14/2019	BBK	Conferring w/ KES re files requested for named plaintiffs from Brookdale in 2018.	0.1	
1/14/2019	KES	Review status of client documents.	0.5	
1/15/2019	BBK	Reviewing newly issued 9th Circuit opinion on scope of Title III ADA definition of public accommodation (Robles v. Domino's Pizza).	0.3	
1/16/2019	GCG	Legal research.	0.1	
1/16/2019	GCG	Conference and email with KES re potential plaintiff.	0.1	
1/16/2019	BBK	Reviewing KES memo re call w/ Brookdale Windsor resident's family member.	0.1	
1/16/2019	KES	TC relative of Brookdale Windsor resident, follow up email re same; draft memo to team re same.	1.0	
1/16/2019	KES	Download and circulate pleading.	0.1	
1/17/2019	GCG	Review court order; email with co-counsel regarding same.	0.2	
1/17/2019	BBK	Conferring w/ team re notifying court re death of named plaintiff E. Boris.	0.1	
1/17/2019	KES	Review and download court order.	0.1	
1/18/2019	GCG	Email JC regarding HC illness.	0.1	
1/18/2019	FFV	(Billing Judgment) Download e-filed pleadings from the SFSC, email and save to the DMS.	0.0	0.3
1/18/2019	KES	Update master contact chart.	0.1	
1/20/2019	GCG	Emails to JC and MH regarding death of HC.	0.1	
1/21/2019	GCG	Review letter from JB regarding Rule 26 conference.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/21/2019	GCG	Begin drafting motion for relief from stipulation.	0.1	
1/22/2019	GCG	Oversee order of transcript.	0.1	
1/22/2019	BBK	Reviewing Defendants' letter to GCG rejecting request to hold Rule 26(f) conference and commencing discovery on at least non-ADA related claims that will clearly go forward.	0.1	
1/22/2019	FFV	(Billing Judgment) Rename and save doc to the DMS.	0.0	0.2
1/22/2019	KES	Prepare and file Transcript Order.	0.4	
1/23/2019	GCG	Conference and email with SRG regarding Brookdale conditions.	0.2	
1/23/2019	KES	Follow up regarding check for transcript.	0.1	
1/24/2019	GCG	Research and draft motion for relief from stipulation.	0.8	
1/24/2019	GCG	Conferences with BBK and AG and emails with KES regarding revisions to same and legal research.	0.5	
1/24/2019	GCG	Email JC regarding HC.	0.1	
1/24/2019	SJR	Conference and email with GG re status.	0.3	
1/24/2019	BBK	Conferring with GCG regarding motion for relief from stipulation.	0.1	
1/24/2019	AG	(Billing Judgment) Met with GCG regarding procedural research.	0.0	0.1
1/24/2019	AG	(Billing Judgment) Legal research regarding relief from interlocutory orders and writs of mandamus.	0.0	3.5
1/24/2019	KES	Online research re plaintiff death.	0.2	
1/24/2019	KES	Review and revise draft motion.	0.4	
1/25/2019	GCG	Review and analyze court order regarding Defendants' motions.	0.7	
1/25/2019	GCG	Emails with clients and co-counsel regarding court order regarding Defendants' motions.	0.5	
1/25/2019	GCG	Conference with GW regarding CMC statement.	0.3	
1/25/2019	GCG	Emails with Defendants' counsel regarding CMC statement and need to meet and confer.	0.3	
1/25/2019	GCG	Emails regarding notice of death of plaintiffs.	0.2	
1/25/2019	MWB	Review Brookdale decision.	0.2	
1/25/2019	SJR	Court order and emails re same.	0.5	
1/25/2019	BBK	Reviewing court's order denying Defendants' pending motions.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/25/2019	BBK	Conferring with team and co-counsel regarding next steps in litigation.	0.2	
1/25/2019	JSY	Emails regarding order; review order regarding motion to compel and motions to dismiss and strike; confer. with GCG regarding same; emails regarding next steps in case; LM for daughter of deceased class rep. regarding same.	0.6	
1/25/2019	KES	Review court order and confer team re same.	0.5	
1/25/2019	KES	(Billing Judgment) Calendar new deadlines.	0.0	0.3
1/26/2019	GCG	Emails with named plaintiffs re next steps.	0.1	
1/28/2019	GCG	Review and analyze order.	0.2	
1/28/2019	GCG	Conferences with LB and JY re order.	0.2	
1/28/2019	GCG	Review and revise draft CMC statement.	0.2	
1/28/2019	GCG	Review N.D. Cal. guidelines.	0.1	
1/28/2019	GCG	Download documents from Defendants; conference with KES re same.	0.1	
1/28/2019	GCG	Emails with MJ re meet and confer and exchange of CMC statements.	0.2	
1/28/2019	GCG	Email GW and team re meet and confer and exchange of CMC statements.	0.2	
1/28/2019	BBK	Reviewing G. Wallace's draft Joint CMC Statement and GCG's comments thereon.	0.2	
1/28/2019	BBK	Reviewing communications w/ opposing counsel re production of Plaintiffs' files and scheduling CMC conference call for 2/1.	0.1	
1/28/2019	JSY	Conf. w/ GCG re status of case and next steps.	0.2	
1/28/2019	JSY	T/C with attorney of Brookdale resident re status of case.	0.2	
1/28/2019	KES	Review updated plaintiff records provided by defendants.	1.1	
1/28/2019	KES	Review published case.	0.1	
1/28/2019	KES	Download plaintiff obituary.	0.1	
1/28/2019	KES	Download and circulate ND guidelines for team.	0.2	
1/29/2019	GCG	(Reduced Charge) Travel to conduct meeting with co-counsel re CMC meet and confer, initial disclosures, e-discovery and expert testimony.	0.5	0.5
1/29/2019	GCG	Follow-up conferences and emails with BBK, JSY, KES re initial disclosures and document production.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/29/2019	GCG	Email JC re potential witness.	0.1	
1/29/2019	GCG	Email GW-Defendants re CMC statement and meet & confer.	0.2	
1/29/2019	GCG	Conduct meeting with co-counsel re CMC meet and confer, initial disclosures, e-discovery and expert testimony.	1.4	
1/29/2019	BBK	(Reduced Charge) Travel to/from Schneider Wallace for co-counsel meeting (w/ GCG/JY).	0.5	0.5
1/29/2019	BBK	Meeting w/ co-counsel at Schneider Wallace (w/ GCG/JY).	1.4	
1/29/2019	BBK	Reviewing final draft joint CMC Statement sent to opposing counsel in advance of 2/1 call.	0.2	
1/29/2019	BBK	Conferring w/ RBGG team re sharing client docs w/ co-counsel to upload to Relativity; scheduling weekly RBGG team meetings.	0.1	
1/29/2019	JSY	(Reduced Charge) Travel to and from meeting in Emeryville with co-counsel.	0.5	0.5
1/29/2019	JSY	Meeting with co-counsel re next steps.	1.4	
1/29/2019	JSY	Conf. and emails re ESI and next steps for case discovery.	0.3	
1/29/2019	KES	Review, organize and upload documents to Sharefile for possible initial disclosures and production.	2.8	
1/30/2019	GCG	Conference with KES re documents uploaded to Relativity.	0.1	
1/30/2019	GCG	Email JC re witness.	0.1	
1/30/2019	BBK	Reviewing McKnight Senior Living article on 1/25 order denying Defendants' motions.	0.1	
1/30/2019	KES	Review and organize documents to share with co-counsel for upload to Relativity for initial disclosures.	2.7	
1/30/2019	KES	Update electronic press file.	0.1	
1/31/2019	GCG	Confs w/ potential witnesses.	1.0	
1/31/2019	GCG	Draft memo to file re interview w/ MC.	0.5	
1/31/2019	GCG	Review documents from MC.	0.7	
1/31/2019	GCG	Emails to GW and team re potential witnesses and experts.	0.4	
1/31/2019	GCG	Email to MJ re document production and CMC statement.	0.1	
1/31/2019	GCG	Research re client death.	0.2	
1/31/2019	BBK	Conferring w/ KES re Relativity access for RBGG and initial disclosures.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/31/2019	BBK	Reviewing GCG report re contact by former Brookdale employee; conferring w/ co-counsel re potential experts to retain.	0.2	
1/31/2019	JSY	Call with potential class member; emails re same.	0.2	
1/31/2019	KES	Review and gather client document for upcoming filing.	0.1	
1/31/2019	KES	Consider additional documents to be uploaded to database.	0.7	
1/31/2019	KES	Download and review newly produced plaintiff files.	0.2	
2/1/2019	GCG	Emails to MJ and co-counsel regarding defendants' request to postpone meet and confer.	0.2	
2/1/2019	GCG	Draft and circulate memos to file regarding witness interviews.	0.9	
2/1/2019	GCG	Conference with named plaintiff PL.	0.1	
2/1/2019	GCG	Analyze defendants' proposed CMC statement.	0.4	
2/1/2019	GCG	Revise and circulate team to do list.	0.3	
2/1/2019	GCG	Conference with BBK, KY and KES regarding initial disclosures and document review.	0.7	
2/1/2019	GCG	Begin drafting initial disclosures.	0.2	
2/1/2019	BBK	Conferring with team regarding regarding-scheduling status conference call for Monday at opposing counsel's request.	0.1	
2/1/2019	BBK	RBGG team meeting.	0.7	
2/1/2019	BBK	Reviewing updated to-do list distributed by GCG.	0.1	
2/1/2019	BBK	Conferring with JY and GCG regarding scope of initial disclosure of potential witnesses.	0.4	
2/1/2019	JSY	Team meeting; Conference with BBK regarding initial disclosures; research regarding same; emails regarding same.	1.6	
2/1/2019	JSY	Review list of potential witnesses.	0.1	
2/1/2019	FFV	(Billing Judgment) Transcription regarding two memos to file.	0.0	0.5
2/1/2019	FFV	(Billing Judgment) Revise memo per GCG's edits; finalize and email to GCG.	0.0	1.2
2/1/2019	KES	Update electronic files with hearing transcript.	0.1	
2/1/2019	KES	Team meeting to discuss case status, initial disclosures.	0.7	
2/1/2019	KES	Review and consider additional documents to upload to database and email A. Laudick regarding same.	0.4	
2/1/2019	KES	Review emails regarding case issues and initial disclosures.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/2/2019	GCG	Email to JC and team regarding death certificate.	0.1	
2/4/2019	GCG	Prepare for and conduct meet & confer with Defendants regarding CMC Statement.	0.6	
2/4/2019	GCG	Pre-meeting conference with GW, JSY, MJ regarding document preservation and other issues.	0.2	
2/4/2019	GCG	Review document preservation letters and draft CMC Statement.	0.6	
2/4/2019	GCG	Review G056 cases from GW.	0.1	
2/4/2019	GCG	Conference and email with JY regarding potential named Plaintiff JA.	0.1	
2/4/2019	GCG	Begin drafting potential claims for JA.	0.1	
2/4/2019	GCG	Email GW regarding revisions to CMC Statement.	0.1	
2/4/2019	BBK	Reviewing GCG memos to team regarding 2/1 communications with named Plaintiff and with former BD employee; reviewing opposing counsel's letter responding to evidence preservation letter.	0.2	
2/4/2019	BBK	Communications with team regarding visiting potential new class reps in southern California.	0.1	
2/4/2019	JSY	Review draft CMC statements; call with co-counsel regarding same; meet and confer with opposing counsel regarding same.	1.0	
2/4/2019	JSY	Conference with GCG regarding potential new class representative; call and emails with JA regarding same.	0.5	
2/4/2019	KES	Review and organize additional documents to be uploaded to database.	2.3	
2/4/2019	KES	Review master tracking chart regarding potential witnesses and consider additional resident files to be uploaded to database.	0.8	
2/5/2019	GCG	Review Defendants' changes to CMC Statement.	0.5	
2/5/2019	GCG	Emails with GW, JM and conference with JY regarding Defendants' changes to CMC Statement.	0.2	
2/5/2019	GCG	Email class representatives regarding document production and initial disclosures.	0.2	
2/5/2019	BBK	Reviewing joint CMC statement filed today.	0.3	
2/5/2019	JSY	Multiple conference. and emails regarding CMC statement.	0.3	
2/5/2019	FFV	(Billing Judgment) Save doc to the DMS.	0.0	0.2
2/5/2019	KES	Download and circulate Joint CMC statement.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/6/2019	GCG	Conference with JB regarding death of HC and status of case.	0.2	
2/6/2019	GCG	Conference with JY regarding new named plaintiff interview and retention.	0.2	
2/6/2019	GCG	Emails to KES regarding named plaintiff documents.	0.1	
2/6/2019	GCG	Draft letters to named plaintiffs regarding document production.	0.3	
2/6/2019	GCG	Emails to named plaintiffs regarding CMC statement and discovery.	0.2	
2/6/2019	BBK	Reviewing GCG communications with named Plaintiffs; communications with RBGG team regarding potential new plaintiffs to add.	0.1	
2/6/2019	JSY	Draft TAC sections regarding J. A.	0.8	
2/6/2019	JSY	Emails regarding potential new plaintiff.	0.1	
2/6/2019	JSY	Emails with potential class rep.	0.1	
2/6/2019	KES	Email team regarding information and documents regarding potential class rep.	0.2	
2/6/2019	KES	Online research.	0.3	
2/6/2019	KES	Review emails and correspondence regarding gathering class member documents.	0.4	
2/7/2019	GCG	Review photos from JC; email team regarding same.	0.1	
2/7/2019	GCG	Conferences with JSY regarding drafting allegations for TAC and interviewing potential plaintiff.	0.1	
2/7/2019	JSY	Create Relativity login for e-discovery database for case.	0.1	
2/7/2019	JSY	Draft sections of TAC regarding J.A.; Conference with GCG regarding same.	2.9	
2/7/2019	JSY	Emails with J.A. regarding in person meeting.	0.1	
2/7/2019	JSY	Review order regarding motion to dismiss.	0.2	
2/7/2019	JSY	Telephone Conference with J.A.; Conference with GCG regarding same; edit sections of TAC regarding J.A.	0.5	
2/7/2019	KES	Relativity access, brief database review.	0.3	
2/8/2019	GCG	Research and revise third amended complaint.	0.6	
2/8/2019	GCG	Conference with JY regarding potential new plaintiff.	0.2	
2/8/2019	GCG	Emails to GW and team regarding TAC and interlocutory appeal certification.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/8/2019	BBK	Reviewing JY's draft additions to complaint regarding new plaintiff at Brookdale Brookhurst in Orange County.	0.2	
2/8/2019	JSY	Telephone Conference with J.A. regarding signing up to be named class representative; Conference with GCG regarding same.	0.5	
2/8/2019	KES	Review email re new plaintiff.	0.1	
2/8/2019	KES	Update electronic pleadings file.	0.1	
2/9/2019	GCG	Emails with GW regarding certification/appeal issue.	0.1	
2/11/2019	GCG	Prepare for CMC conference.	0.2	
2/11/2019	GCG	Conference with and email to GW regarding same.	0.3	
2/11/2019	GCG	Conference with JY regarding client interview.	0.1	
2/11/2019	GCG	Revise retainer agreement.	0.1	
2/11/2019	GCG	Conference with SG regarding Fountaingrove.	0.1	
2/11/2019	JSY	Edit retainer agreement for J.A.; Conference with GCG regarding same; prep. for meeting with J.A.	1.2	
2/11/2019	KES	Review and gather executed representation agreements.	0.3	
2/12/2019	GCG	(Reduced Charge) Travel to participate in CMC before Judge Gilliam.	0.5	0.5
2/12/2019	GCG	Follow up conference with GW and telephone conference regarding initial disclosures, TAC and discovery.	0.5	
2/12/2019	GCG	Draft memo to file regarding CMC issues.	0.3	
2/12/2019	GCG	Email to co-counsel regarding same.	0.2	
2/12/2019	GCG	Conference with JY regarding trip to So. Cal to interview JA and revisions to TAC.	0.5	
2/12/2019	GCG	Conference with and email to named plaintiff BJH regarding document production.	0.2	
2/12/2019	GCG	Conference with named plaintiff PL regarding same.	0.2	
2/12/2019	GCG	Conference with KES regarding uploading client documents to relativity.	0.2	
2/12/2019	GCG	Participate in CMC before Judge Gilliam.	1.5	
2/12/2019	JSY	Emails JC and ML re successor in interest issues.	0.5	
2/12/2019	BBK	Reporting to GCG/JY regarding experience with potential magistrate in other matter in light of need to stipulate to a MJ as discovery referee; reviewing JY report regarding same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/12/2019	BBK	Reviewing communications with team regarding obtaining documents from clients for initial disclosures and timeline for sending draft of revised complaint to co-counsel.	0.1	
2/12/2019	JSY	Emails regarding CMC and magistrate judges; research same; Conference with BBK regarding same.	0.3	
2/12/2019	JSY	Emails regarding initial disclosures.	0.1	
2/12/2019	FFV	(Billing Judgment) Print and save to the DMS legal research.	0.0	0.3
2/12/2019	FFV	Save legal research to the DMS.	0.3	
2/12/2019	KES	Review emails regarding client documents.	0.1	
2/12/2019	KES	Update CaseMap access.	0.1	
2/13/2019	GCG	Conferences with and emails to potential witnesses.	0.9	
2/13/2019	GCG	Review client documents.	0.5	
2/13/2019	GCG	Emails to GW and team and Conferences with KES regarding initial disclosures.	0.2	
2/13/2019	GCG	Email to JC regarding trust and estates issues/ status as plaintiff.	0.1	
2/13/2019	GCG	Email JY regarding JA interview.	0.1	
2/13/2019	GCG	Email to BBK and team regarding witness interviews.	0.2	
2/13/2019	JSY	Meeting with J.A.	3.3	
2/13/2019	BBK	(Billing Judgment) Setting up BBK's Relativity access.	0.0	0.1
2/13/2019	BBK	Reviewing GCG memo on 2/12 case management conference and minute entry.	0.1	
2/13/2019	BBK	Conferring with team regarding reaching out to potential witnesses & obtaining needed records for initial disclosures.	0.2	
2/13/2019	BBK	Reviewing BBK's third of list of putative class member contacts to determine who to reach out to regarding potentially disclosing as witness in initial disclosures.	0.3	
2/13/2019	JSY	(Reduced Charge) Travel to Brookdale Brookhurst to meet with J.A.	3.5	3.5
2/13/2019	KES	Review and summarize possible additional docs to be included in initial disclosures; email team regarding additional docs to be uploaded to Relativity; review emails regarding doc production.	1.0	
2/13/2019	KES	Download and circulate minute order and calendar deadline.	0.1	
2/13/2019	KES	Review files for potential witness information.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/14/2019	BBK	Reviewing JY's draft Third Amended Complaint.	0.2	
2/14/2019	BBK	Conferring with litigation team regarding finalizing TAC.	0.1	
2/14/2019	JSY	Edit TAC; emails regarding same with team.	2.0	
2/14/2019	JSY	Conference call regarding initial disclosures.	0.5	
2/14/2019	JSY	Draft initial disclosures.	0.1	
2/14/2019	JSY	Telephone Conference with J.A. regarding TAC.	0.2	
2/15/2019	GCG	Conference with JY and emails with team regarding final revisions to and filing of TAC.	0.1	
2/15/2019	GCG	Emails to GW and JB regarding mediation and magistrate judge.	0.1	
2/15/2019	JSY	Edit, finalize and file TAC; emails regarding same.	2.0	
2/16/2019	GCG	Legal research regarding class cert, incentive payments and defendant counsel communications with class members.	0.2	
2/18/2019	GCG	Emails from potential witnesses regarding conditions in community.	0.2	
2/19/2019	GCG	Emails to MJ and co-counsel regarding interlocutory appeal briefing schedule.	0.2	
2/19/2019	GCG	Emails with potential declarants regarding residency agreement and horrific conditions.	0.3	
2/19/2019	GCG	Conferences with and emails to JY regarding initial disclosures and contact with ombudsman and plaintiffs.	0.4	
2/19/2019	BBK	Reviewing weekly task list distributed by JY.	0.1	
2/19/2019	BBK	Reviewing GCG/JY communications regarding contact with Ombudsman's office.	0.1	
2/19/2019	JSY	Conference with GCG regarding status and regarding Ombudsman; LM for new Sonoma Co. Ombudsman; emails regarding same.	0.4	
2/19/2019	JSY	Email to named plaintiffs regarding TAC and initial disclosures.	0.1	
2/19/2019	JSY	Emails regarding successor in interest declarations.	0.1	
2/19/2019	JSY	Emails with S.I. regarding witness list.	0.1	
2/19/2019	JSY	Update case to do list.	0.3	
2/19/2019	JSY	Update contact list and locate class member info; emails regarding same.	0.4	
2/19/2019	JSY	Conference with KES regarding documents for Relativity.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/19/2019	FFV	(Billing Judgment) Rename and save to the DMS article.	0.0	0.2
2/19/2019	FFV	Update contact list.	0.4	
2/19/2019	KES	Organize new client documents and arrange for upload to Relativity.	0.7	
2/19/2019	KES	Update master tracking chart.	0.2	
2/19/2019	KES	Review emails re witness information.	0.2	
2/20/2019	GCG	Conference with JY and email to GW regarding initial disclosures.	0.1	
2/20/2019	GCG	Research for initial disclosures.	0.1	
2/20/2019	BBK	Reviewing/analyzing prospective class member contacts chart and related documents to ID potential witnesses for declaration follow-up.	2.2	
2/20/2019	BBK	Meeting with JY regarding initial disclosures and class cert declarations.	0.2	
2/20/2019	JSY	Conference with BBK regarding class member contacts and class cert declarations.	0.3	
2/20/2019	JSY	Emails regarding call with former class rep.	0.1	
2/20/2019	JSY	Emails regarding successor in interest declaration.	0.1	
2/20/2019	JSY	Telephone conference with B. Umpierre regarding successor in interest issues; emailed GCG regarding same.	0.4	
2/20/2019	KES	Review putative class member document and attempt to make legible.	0.5	
2/21/2019	GCG	Conference with JY re initial disclosures.	0.1	
2/21/2019	GCG	Emails to GW and opposing counsel regarding magistrate judge choice.	0.1	
2/21/2019	BBK	Conferring with team regarding F/U with Defendants on selecting MJ for discovery issues; reviewing JY update regarding call with plaintiff.	0.1	
2/21/2019	JSY	Telephone Conference with J.A.; email memo to team regarding same.	0.2	
2/21/2019	JSY	Conference with GCG regarding issues with successor trustees for Carlson family.	0.1	
2/21/2019	JSY	Draft initial disclosures; research regarding same.	1.3	
2/22/2019	GCG	Conference with JA regarding new policy regarding wheelchairs.	0.2	
2/22/2019	GCG	Draft memo to file regarding same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 183

SERVICES

Date	Person	Description of Services	Hours	Discount
2/22/2019	GCG	Conference with JY regarding initial disclosures.	0.1	
2/22/2019	GCG	Emails with GW regarding magistrate stipulation and other issues.	0.2	
2/22/2019	BBK	Reviewing JY's update regarding call with CM at BD San Ramon; JY-KES communications regarding initial disclosures; joint filing regarding selection of MJ Beeler.	0.2	
2/22/2019	JSY	Draft initial disclosures.	2.6	
2/22/2019	JSY	Telephone conference with S. Eidler; draft notes regarding same.	0.6	
2/22/2019	KES	Download and circulate pleadings.	0.1	
2/22/2019	KES	Review documents and information in connection with preparation of initial disclosures.	3.5	
2/23/2019	GCG	Research and revise initial disclosures.	0.2	
2/23/2019	GCG	Emails to JY regarding same.	0.2	
2/23/2019	GCG	Review complaint regarding Fountaingrove ED from SG.	0.1	
2/23/2019	GCG	Email to co-counsel regarding restrictions on persons in wheelchairs at Brookhurst.	0.1	
2/25/2019	GCG	Confs w/ JY re factual questions raised by draft initial disclosures.	0.3	
2/25/2019	GCG	Conf w/ and emails to GW re proposed stipulation to briefing schedule.	0.2	
2/25/2019	GCG	Email JB and MJ re same.	0.1	
2/25/2019	GCG	Review defendants' court filings.	0.1	
2/25/2019	BBK	Reviewing JY's draft initial disclosures and drafting proposed addition thereto.	0.2	
2/25/2019	JSY	Conf. w/ GCG re initial disclosures.	0.3	
2/25/2019	JSY	Edit initial disclosures; send to co-counsel.	0.8	
2/25/2019	JSY	Emails re memos re calls with plaintiffs.	0.1	
2/25/2019	JSY	Emails re stipulation re briefing schedule.	0.1	
2/25/2019	KES	Review documents for information to include in initial disclosures.	0.2	
2/25/2019	KES	Review client emails regarding documents and other information for disclosures.	0.1	
2/26/2019	GCG	Review defendants' court filings and appellate filings.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/26/2019	GCG	Confs w/ JY and KES and emails to GW, TC and team re same and re initial disclosures.	0.3	
2/26/2019	GCG	Email to DR and KC re initial disclosures.	0.2	
2/26/2019	BBK	Reviewing Stipulation setting briefing schedule for request for certification of appeal, notice of appeal, and motion to stay proceedings w/r/t Quilan and Carlson pending appeal of arbitration decision.	0.2	
2/26/2019	BBK	Reviewing Defendants' motion for interlocutory appeal of denial of motion to dismiss ADA claims.	0.2	
2/26/2019	KES	Download and circulate appellate documents and calendar deadlines.	0.4	
2/26/2019	KES	Download and circulate district court pleadings and calendar motion deadlines.	0.4	
2/27/2019	GCG	Conf w/ GW re initial disclosures, appeal and motion briefing.	0.2	
2/27/2019	GCG	Emails to GW, AKS and JB re Rule 26 meeting.	0.4	
2/27/2019	GCG	Conf w/ JY and KES and email team re initial disclosures and document review and coding.	0.4	
2/27/2019	GCG	Review Family Council minutes; share w/ team.	0.1	
2/27/2019	GCG	Email to KES re potential client.	0.1	
2/27/2019	GCG	Email to KL re Fountaingrove issues.	0.1	
2/27/2019	BBK	Reviewing communications w/ team re reviewing documents on Relativity.	0.2	
2/27/2019	BBK	Reviewing communications w/ team re timing/finalizing initial disclosures; dispute w/ Ds over whether Judge Gilliam ordered that no Rule 26(f) conference would be held.	0.2	
2/27/2019	JSY	Conf. w/ GCG re Opp to Motion for Stay and status of document production issues; emails re same.	0.2	
2/27/2019	JSY	Emails re relativity.	0.1	
2/27/2019	KES	Telephone Conference with friend of Brookdale resident and email to team regarding same.	0.7	
2/27/2019	KES	Online research regarding additional DSS complaints regarding Brookdale facilities.	0.3	
2/27/2019	KES	Review emails and documents regarding initial disclosure deadlines.	0.2	
2/27/2019	KES	Review and arrange for additional documents to be uploaded to Relativity for disclosures.	1.5	
2/27/2019	KES	Download and circulate pleadings.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2019	KES	Confer team regarding database issues.	0.2	
2/27/2019	KES	Review emails and prepare form for CMC transcript request.	0.2	
2/28/2019	GCG	Conf w/ AKS and emails to GW and team re defendants' position that court canceled Rule 26(f) conference and referred parties to magistrate instead.	0.9	
2/28/2019	GCG	Emails to AKS, KES and team re L/D to answer.	0.2	
2/28/2019	GCG	Conf w/ JSY re opposition to stay briefing.	0.1	
2/28/2019	GCG	Conf w/ KES and emails to putative class member re staffing failures at Orange Grove.	0.2	
2/28/2019	LAE	(Billing Judgment) Emails and conf with JSY re stay briefing and standards.	0.0	0.2
2/28/2019	BBK	Conferring w/ JY re Relativity.	0.1	
2/28/2019	BBK	Reviewing Defendants' request for further extension to file answer; communications w/ co-counsel re need to file Admin Motion to order Defendants to finally participate in Rule 26(f) conference; reviewing GCG report on call w/ Koh-Sweeney.	0.1	
2/28/2019	BBK	Reviewing JY update re call w/ Ombudsman.	0.1	
2/28/2019	JSY	Conf. w/ LAE, VS, MLF re stay research.	0.4	
2/28/2019	JSY	Emails re relativity.	0.2	
2/28/2019	JSY	Research re Opp to Motion for Stay.	1.5	
2/28/2019	JSY	T/C with Ombudsman for Sonoma County; email team re same.	0.3	
2/28/2019	KES	Download and circulate pleading.	0.1	
2/28/2019	KES	Tcs and emails with advocate for Brookdale resident and review documents provided.	1.2	
2/28/2019	KES	Review emails re case status.	0.1	
3/1/2019	GCG	Email to JY re opposition to motion to stay.	0.1	
3/1/2019	GCG	Email to VS re motion for class cert.	0.1	
3/1/2019	GCG	Review CMC transcript; emails to GW and team re Rule 26(f) conference and admin motion.	0.3	
3/1/2019	GCG	Email to AKS and JB re same.	0.2	
3/1/2019	BBK	Reviewing G. Wallace and GCG communications re ambiguity of transcript of hearing re Rule 26(f) conference and need for Admin Motion.	0.1	
3/1/2019	JSY	Research for Opp to Motion for Stay; draft same.	3.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/1/2019	JSY	Emails re interpretation of CMC Transcript re 26(f) Conference.	0.2	
3/1/2019	JSY	Emails with JA re change in transport policy.	0.1	
3/1/2019	FFV	(Billing Judgment) Scan and save to the DMS two relevant articles; email same to the team.	0.0	0.7
3/1/2019	KES	Update electronic files.	0.1	
3/1/2019	KES	Review documents and consider issues for document production.	0.4	
3/4/2019	GCG	Research re Rule 23(f) decision.	0.2	
3/4/2019	GCG	Research and draft administrative motion to compel Rule 26(f) meeting.	1.6	
3/4/2019	GCG	Conf w/ and email to KS re document review and discovery.	0.3	
3/4/2019	GCG	Conf w/ JY and email GW and team re initial disclosure revisions.	0.5	
3/4/2019	GCG	Review and revise document coding scheme.	0.2	
3/4/2019	GCG	Conf w/ SG re Fountaingrove changes; email team re same.	0.3	
3/4/2019	GCG	Review and revise 9th Circuit mediation statement.	0.4	
3/4/2019	GCG	Conf w/ JY and email to team re same.	0.2	
3/4/2019	BBK	Reviewing updated task list from JY.	0.1	
3/4/2019	BBK	Reviewing draft Relativity coding panel by A. Laudick.	0.1	
3/4/2019	BBK	Conference call w/ JY/KES and co-counsel on Relativity and doc coding protocols.	1.4	
3/4/2019	BBK	Conferring w/ team re 9th Cir appeal mediation questionnaire.	0.1	
3/4/2019	JSY	Emails re Mediation Q; draft same; research same.	0.2	
3/4/2019	JSY	Draft letter to MS re press inquiries.	0.2	
3/4/2019	JSY	Update to do list; emails re same.	0.2	
3/4/2019	JSY	Relativity orientation for case; conf. w/ team re coding panel.	1.6	
3/4/2019	JSY	Draft Opp to Motion for Stay; research re same; conf. w/ GCG re same.	4.0	
3/4/2019	KES	Telephonic meeting with co-counsel re coding and document review in Relativity; review draft coding terms re same.	1.0	
3/5/2019	GCG	Confs w/ and emails to JY re opposition to motion to stay and initial disclosures.	0.5	
3/5/2019	GCG	Review and revise initial disclosures.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/5/2019	GCG	Email to AKS and team re same.	0.1	
3/5/2019	GCG	Research, draft and revise motion to compel Rule 26(f) conference; email to team re same.	1.2	
3/5/2019	GCG	Email w/ GW re defendants' mediation proposal.	0.2	
3/5/2019	BBK	Reviewing Defendants' mediation questionnaire filed in 9th Cir appeal of arbitration ruling & GCG's draft admin motion for ordering compelling Rule 26(f) conference.	0.2	
3/5/2019	JSY	Conf. w/ GCG re Opp to Motion for Stay.	0.1	
3/5/2019	JSY	Research and draft Opp to Motion to Stay.	3.5	
3/5/2019	JSY	Emails with J. Algarme re meeting with ED.	0.1	
3/5/2019	JSY	Finalize initial disclosures.	0.7	
3/5/2019	JSY	Research re potential mediators.	0.2	
3/5/2019	KES	Review additional information for initial disclosures; finalize and serve initial disclosures.	1.5	
3/5/2019	KES	Prepare exhibit for administrative motion.	0.1	
3/5/2019	KES	Download and circulate 9th circuit document.	0.1	
3/5/2019	KES	Review email re call with plaintiff.	0.1	
3/6/2019	GCG	Revise motion to compel Rule 26 conference.	1.0	
3/6/2019	GCG	Email MJ and team re same.	0.2	
3/6/2019	GCG	Oversee e-filing and calendaring of motion.	0.2	
3/6/2019	GCG	Confs w/ JY and KES re same.	0.2	
3/6/2019	BBK	Reviewing M. Johnson's proposed revisions to GCG's Admin Motion to Compel Rule 26(f) Conference and final motion filed.	0.1	
3/6/2019	JSY	Conf. w/ GCG re Admin Motion for Rule 26(f) conf; review and edit same.	0.2	
3/6/2019	JSY	Draft Opp to Motion for Stay; conf. w/ GCG re same.	3.9	
3/6/2019	JSY	Emails re admin motion; edit same; conf. w/ GCG re same.	0.1	
3/6/2019	KES	File Administrative Motion to Compel Rule 26f Conference and email proposed order.	0.3	
3/7/2019	GCG	Review court order assigning Judge Beeler.	0.2	
3/7/2019	GCG	Conf w/ KES re updating file.	0.2	
3/7/2019	GCG	Research and revise opposition to stay.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/7/2019	GCG	Conf w/ and email to JY re same.	0.2	
3/7/2019	BBK	Reviewing order referring case to MJ Beeler for discovery disputes; reviewing GCG report re same.	0.1	
3/7/2019	JSY	Research and draft Opp to Motion for Stay; conf. w/ GCG re same.	1.7	
3/7/2019	FFV	(Billing Judgment) Print pltf's opp for GCG; search and print defs' mot to stay.	0.0	0.3
3/7/2019	KES	Download and circulate pleading.	0.1	
3/8/2019	GCG	Conf w/ and email to SC re opposition to motion to stay.	0.3	
3/8/2019	GCG	Conf w/ and email to JY re same.	0.2	
3/8/2019	GCG	Conf w/ BBK, JY and KES re document review and coding.	0.4	
3/8/2019	BBK	Communications w/ team re revising/filing opposition to motion to stay.	0.1	
3/8/2019	BBK	Reviewing JY's draft opposition to motion to stay.	0.3	
3/8/2019	BBK	Reviewing court orders filed today (notice of CMC, order denying admin motion, and discovery order by MJ Beeler).	0.2	
3/8/2019	BBK	RBGG team meeting w/ GCG/JY/KES.	0.4	
3/8/2019	BBK	Reviewing BD's initial disclosures served this week.	0.1	
3/8/2019	BBK	Reviewing/proposing revision to draft coding panel for document/privilege review on Relativity; conferring w/ JY re proposals.	0.3	
3/8/2019	JSY	Team meeting.	0.4	
3/8/2019	JSY	Draft Opp to Motion for Stay; emails re same; review prior orders and briefing in Aegis case re same.	2.0	
3/8/2019	JSY	Finalize ML successor in interest declaration; email same.	0.2	
3/8/2019	JSY	Emails re coding panel.	0.2	
3/8/2019	JSY	Emails with J. Algarme.	0.1	
3/8/2019	FFV	(Billing Judgment) Save article in the DMS.	0.0	0.2
3/8/2019	KES	Team meeting re document production and discovery issues.	0.4	
3/8/2019	KES	Download and circulate pleadings and calendar deadlines.	0.4	
3/9/2019	GCG	Research for Opposition to Stay.	0.2	
3/9/2019	GCG	Emails with SC, JY re research for Opposition to Stay.	0.2	
3/10/2019	GCG	Email GW re Opposition to Stay.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/10/2019	GCG	Email SC re Opposition to Stay.	0.1	
3/11/2019	GCG	Revise Opposition to Stay.	0.3	
3/11/2019	GCG	Conferences with JY and emails with GW and team re Opposition to Stay and re request for additional time to respond to certification request.	0.2	
3/11/2019	GCG	Conference with putative class member re DSS finding re medication management at Windsor.	0.2	
3/11/2019	GCG	Review court orders re Thursday's hearing.	0.1	
3/11/2019	BBK	Cite-checking & revising Opposition to Motion for Partial Stay Pending Appeal of Denial of Motion to Compel Arbitration.	1.6	
3/11/2019	BBK	Conferring w/ JY re cite-checking/revising Opposition to be filed today.	0.1	
3/11/2019	JSY	Edit, finalize and file Opp to Motion for Stay.	3.1	
3/11/2019	KES	Download and circulate opposition; prepare and send courtesy copies.	0.3	
3/12/2019	GCG	Emails GW re court hearing.	0.1	
3/12/2019	GCG	Review stipulation re interlocutory appeal.	0.1	
3/12/2019	JSY	Emails with J. Algarme re transportation issues.	0.1	
3/12/2019	KES	Download and circulate 9th Circuit order and calendar deadline.	0.2	
3/12/2019	KES	Download and circulate stipulation.	0.1	
3/12/2019	KES	Review new client document.	0.1	
3/13/2019	GCG	Prepare for and conduct call with GW, MJ, JY re discovery hearing before Magistrate Judge Beeler.	0.5	
3/13/2019	GCG	Review initial disclosures and Third Amended Complaint; prepare for hearing.	0.2	
3/13/2019	GCG	Email with BBK re Defendants' answer.	0.1	
3/13/2019	GCG	Email with KES re interlocutory appeal.	0.1	
3/13/2019	BBK	Conferring w/ GCG re prep for discovery hearing on 3/14.	0.1	
3/13/2019	BBK	Reviewing/analyzing Defendants' Answer and drafting email report thereon for team.	1.1	
3/13/2019	JSY	Call with co-counsel re discovery and hearing prep.	0.9	
3/13/2019	KES	Download and circulate order.	0.1	
3/13/2019	KES	Calendar new deadline.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 190

SERVICES

Date	Person	Description of Services	Hours	Discount
3/13/2019	KES	Brief review of Defs initial disclosures.	0.1	
3/13/2019	KES	Update electronic documents folder.	0.2	
3/14/2019	GCG	Participate in hearing before magistrate judge; conduct Rule 26(f) conference; follow-up conference with co-counsel re next steps.	2.9	
3/14/2019	GCG	(Reduced Charge) Travel court-office.	0.2	0.3
3/14/2019	GCG	Review and analyze motion to certify ADA question; email GW re same.	0.4	
3/14/2019	GCG	Conferences with BBK, KES re discovery now open; email JY re same.	0.2	
3/14/2019	GCG	Emails re JH retaliation issues.	0.1	
3/14/2019	BBK	Reviewing M. Johnson analysis re responsive documents that Defendants should be able to produce almost immediately.	0.1	
3/14/2019	BBK	Reviewing JY email to co-counsel w/ RBGG redlines to Relativity coding panel.	0.1	
3/14/2019	BBK	Reviewing court order re completion of Rule 26(f) conference and discovery plan.	0.1	
3/14/2019	BBK	Reviewing JY report re client concerns of BD retaliation for participation in lawsuit.	0.1	
3/14/2019	JSY	Emails re coding panel.	0.1	
3/14/2019	JSY	Emails re J. Algarme re issues at Brookhurst.	0.2	
3/14/2019	JSY	Emails with J. Algarme.	0.2	
3/14/2019	KES	Emails re call from class member.	0.2	
3/14/2019	KES	Download, circulate and review court orders and audio files.	0.4	
3/15/2019	GCG	Conf w/ SG.	0.1	
3/15/2019	GCG	Email to MJ re Rule 26(f) report.	0.1	
3/15/2019	GCG	Conf w/ BBK, JY and KES re document coding, class cert, declarations and discovery.	0.4	
3/15/2019	GCG	Review class member report.	0.1	
3/15/2019	GCG	Research re interlocutory appeals.	0.2	
3/15/2019	GCG	Emails to GW and team re same.	0.1	
3/15/2019	GCG	Email to JY re ML estate declaration.	0.1	
3/15/2019	BBK	Reviewing GCG's recommendations to G. Wallace re responding to Defendants' motion to certify interlocutory appeal.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/15/2019	BBK	RBGG team meeting.	0.4	
3/15/2019	BBK	Reviewing M. Johnson proposed additional revisions to Relativity coding panel; JY-M.Johnson comm'ns re finalizing coding panel and assigning batches so coding can begin week of 3/18.	0.2	
3/15/2019	BBK	Reviewing JY comm'ns w/ daughter of named Plaintiff re successor-in-interest declaration; JY update re call w/ named P re concerns about retaliation by BD for participating in lawsuit.	0.1	
3/15/2019	JSY	Finalize ML declaration re successor in interest; multiple conf and emails re same.	0.3	
3/15/2019	JSY	Emails re finalizing coding panel and doc review.	0.3	
3/15/2019	JSY	Team meeting; f/u with co-counsel re various case tasks.	0.3	
3/15/2019	JSY	T/C with Sonoma County Ombudsman re possible intake.	0.2	
3/15/2019	JSY	T/C with J. Algarme; emails to team re same.	0.4	
3/15/2019	KES	Team meeting re discovery, case status.	0.5	
3/17/2019	JSY	Research re interlocutory appeal certification issue.	0.9	
3/18/2019	GCG	Email to MJ re letter to defendants re discovery issues.	0.1	
3/18/2019	BBK	Reviewing JY research re procedural time limit for requesting interlocutory appeal.	0.1	
3/18/2019	BBK	Reviewing Defendants' Reply ISO Motion for Stay Pending Appeal of Order Denying Motion to Compel Arbitration.	0.2	
3/18/2019	JSY	Research re interlocutory appeal certification issue; emails re same.	0.5	
3/18/2019	FFV	Save filed pleadings to the DMS.	0.2	
3/18/2019	KES	Download and circulate order.	0.1	
3/19/2019	GCG	Revise letter from MJ and defendants re discovery.	0.3	
3/19/2019	GCG	Emails to MJ and team re same and re recent DSS report.	0.2	
3/19/2019	GCG	Review and analyze Reply ISO motion for partial stay.	0.5	
3/19/2019	BBK	Reviewing DSS Facility Evaluation Reports for Fountaingrove and DSS Complaint Investigation Report confirming report by BD Windsor resident from March 2019.	0.2	
3/19/2019	BBK	Reviewing update from A. Laudrick re batches for document coding.	0.1	
3/19/2019	FFV	(Billing Judgment) Red line ltr to JB.	0.0	0.5

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2019	FFV	(Billing Judgment) Additional revisions to the ltr to JB; email same to GCG.	0.0	0.3
3/19/2019	KES	Gather and circulate new DSS complaint reports re Brookdale facilities.	0.2	
3/20/2019	GCG	Emails to JY and JBC re Helen Carlson status and ML filing, decl.	0.1	
3/20/2019	GCG	Emails w/ MJ re discovery letter and ESI search terms.	0.1	
3/20/2019	GCG	Email to AL and conf w/ JY re document review and coding.	0.1	
3/20/2019	BBK	Reviewing 3/19 M. Johnson letter to opposing counsel re F/U on matters discussed at Rule 26(f).	0.1	
3/20/2019	BBK	Reviewing filed successor-in-interest declaration by daughter of deceased Plaintiff & communications with her and JY.	0.1	
3/20/2019	JSY	Finalize and file ML declaration; emails re same.	0.3	
3/20/2019	KES	Download and circulate pleading.	0.1	
3/22/2019	JSY	Emails with and call from J. Algarme re transportation issue.	0.1	
3/22/2019	JSY	Research re short term stays issue.	0.4	
3/22/2019	KES	Online research re issue for opposition to motion to stay.	0.5	
3/24/2019	GCG	Review draft brief opposing interlocutory appeal certification.	0.3	
3/24/2019	GCG	Email to GW and team re same.	0.1	
3/25/2019	GCG	Email w/ JC re HC estate and plaintiff status.	0.1	
3/25/2019	GCG	Emails w/ MJ re revisions to interlocutory appeal, ESI order and protective order; review same.	0.4	
3/25/2019	GCG	Email w/ GW and KES re opposition to interlocutory appeal.	0.1	
3/25/2019	GCG	Conf w/ JA re wheelchair lift issues.	0.2	
3/25/2019	GCG	Draft memo to file re same.	0.2	
3/25/2019	BBK	Reviewing GCG's report re concern raised by named Plaintiff re BD community's bus unable to accommodate her electronic wheelchair.	0.1	
3/25/2019	JSY	Emails re issues with J. Algarme.	0.1	
3/25/2019	KES	Download and circulate opposition to motion.	0.1	
3/25/2019	KES	Review communications with plaintiffs.	0.1	
3/25/2019	KES	Update electronic files.	0.1	
3/26/2019	GCG	Email to MJ and team re revised protective order.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 193

SERVICES

Date	Person	Description of Services	Hours	Discount
3/26/2019	KES	Review coding batch and coding panel; begin document coding for initial disclosures.	0.9	
3/27/2019	GCG	Conf w/ JY and email to TC re redaction of documents.	0.1	
3/27/2019	GCG	Revise communication to 9th Cir. mediator.	0.1	
3/27/2019	GCG	Conf w/ JY and email to team re same.	0.1	
3/27/2019	GCG	Conf w/ RC and JC w/ JY re HC estate declaration and next steps in litigation.	0.3	
3/27/2019	BBK	Reviewing Plaintiffs' Opposition to Motion for Interlocutory Appeal of dismissal of ADA claims.	0.3	
3/27/2019	BBK	Reviewing JY's letter to 9th Cir Clerk re mediation order.	0.1	
3/27/2019	JSY	Draft email to court mediator; edit and send same.	0.3	
3/27/2019	JSY	Conf. w/ GCG re doc review issues.	0.1	
3/27/2019	JSY	T/C with Carlson family re successor in interest issue.	0.3	
3/27/2019	KES	Download and circulate pleading.	0.1	
3/27/2019	KES	Review communications re document coding.	0.1	
3/28/2019	GCG	Email to SC and team re class member issues.	0.1	
3/28/2019	GCG	Review emails from co-counsel re discovery issues.	0.1	
3/28/2019	GCG	Review article re Brookdale issues.	0.1	
3/28/2019	GCG	Email to SG re family council.	0.2	
3/28/2019	BBK	Reviewing communications w/ co-counsel re Relativity coding and confidentiality tagging.	0.1	
3/29/2019	GCG	Email w/ potential witness.	0.2	
3/29/2019	GCG	Conf w/ GW, SC and JY re class member advocacy, site inspections, and discovery to be served.	0.6	
3/29/2019	JSY	Draft successor in interest declaration for RC; emails re same.	0.3	
3/29/2019	JSY	Team meeting; conf. w/ GCG re named plaintiff advocacy.	0.4	
4/1/2019	GCG	Emails to JY, JC and team regarding Carlson declaration.	0.1	
4/1/2019	GCG	Email to MJ and defendants regarding protective order.	0.1	
4/1/2019	BBK	Reviewing JY update regarding successor-in-interest declaration for R. Carlson to represent his deceased mother and filing thereof.	0.1	
4/1/2019	JSY	Finalize and file Carlson successor in interest declaration.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/1/2019	JSY	Document review.	0.1	
4/1/2019	KES	TC from relative of Brookdale resident and email team regarding same.	0.5	
4/2/2019	GCG	Emails to MJ regarding call with defendants regarding ESI and PO.	0.2	
4/2/2019	KES	Review and code documents for initial disclosures.	1.5	
4/2/2019	KES	Online research and circulate published decision.	0.1	
4/2/2019	KES	Download and circulate order.	0.1	
4/3/2019	KES	Consider confidentiality and relevance issue regarding document coding and confer JY regarding same.	0.3	
4/4/2019	GCG	Conf with and email to SC regarding class member concerns.	0.2	
4/4/2019	JSY	Document review.	3.2	
4/5/2019	GCG	Conf with JY and emails to MJ regarding call with defendants regarding ESI and PO.	0.3	
4/5/2019	GCG	Email to MJ and team regarding same and regarding call from East Bay Times regarding class member who died after a fall.	0.2	
4/5/2019	GCG	Conf with JK regarding issues in case.	0.4	
4/5/2019	JSY	T/C with opposing counsel regarding ESI issues.	0.8	
4/5/2019	JSY	Document review.	2.3	
4/6/2019	GCG	Conf with and emails with JK regarding issues in case.	0.2	
4/8/2019	JSY	Emails re call with opposing counsel re discovery issues.	0.1	
4/9/2019	GCG	Review defendants' revisions to protective order.	0.1	
4/9/2019	GCG	Emails to MJ and team regarding same.	0.2	
4/9/2019	JSY	Emails regarding sample declarations.	0.1	
4/10/2019	JSY	Document review.	3.5	
4/10/2019	KES	Continue review and coding of client documents.	3.0	
4/11/2019	GCG	Conf with and email to GW regarding mediation, document requests and class member declarations.	0.2	
4/11/2019	GCG	Conf with JY and emails to MJ and team regarding protective order and document review and coding.	0.3	
4/11/2019	BBK	Conferring with team regarding adding tags to Relativity.	0.1	
4/11/2019	BBK	Conferring with JY regarding review/tagging of batches of records.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/11/2019	JSY	Review documents; emails regarding same.	3.6	
4/12/2019	GCG	Conf with BBK, JSY and KES regarding document review and coding and class member declarations.	0.4	
4/12/2019	GCG	Emails to MJ and defendants regarding ESI protocol and protective order.	0.2	
4/12/2019	BBK	Reviewing updated task list for case in advance of meeting.	0.1	
4/12/2019	BBK	Weekly team meeting with GCG, JY and KES.	0.4	
4/12/2019	JSY	Update to do list.	0.2	
4/13/2019	GCG	Email to GW regarding notices of inspection.	0.1	
4/15/2019	GCG	Emails to FV and team regarding EB article.	0.2	
4/15/2019	FFV	(Billing Judgment) Download, pdf and save to the DMS article regarding senior living largest assisted living provider.	0.0	0.3
4/15/2019	KES	TC relative of Brookdale Skilled Nursing resident and email to team regarding same.	0.4	
4/15/2019	KES	Continue coding documents for production.	0.5	
4/16/2019	GCG	Conf with MW regarding background and facts.	0.4	
4/16/2019	GCG	Review Brookdale facility list.	0.2	
4/16/2019	GCG	Emails to MJ, GW and team regarding same and regarding document production and review.	0.4	
4/16/2019	BBK	Reviewing KES report regarding call with family member of class member; reviewing GCG update regarding Defendants' first production of documents; GCG-co-counsel communications regarding press coverage.	0.2	
4/16/2019	JSY	Emails regarding Defs' document production.	0.1	
4/16/2019	JSY	Document review.	2.0	
4/16/2019	KES	Email response to relative of Brookdale resident.	0.1	
4/16/2019	KES	Review files for additional documents to be uploaded to Relativity and email to co-counsel regarding same.	0.6	
4/16/2019	KES	Continue review and coding of documents for production.	0.5	
4/17/2019	GCG	Email to BBK, JY and team regarding review of documents produced by defendants.	0.1	
4/17/2019	GCG	Email with witness regarding recent development.	0.1	
4/17/2019	GCG	Emails to CW and MW regarding KQED report.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 196

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2019	BBK	Conferring with team regarding batching docs received from Defendants as first production & status of tagging plaintiff docs.	0.1	
4/17/2019	JSY	Document review.	0.5	
4/17/2019	JSY	Emails re calls to class reps.	0.1	
4/17/2019	KES	Continue coding client documents for production.	2.5	
4/18/2019	GCG	Email with witness MH regarding status of case.	0.1	
4/18/2019	GCG	Emails regarding call with JA.	0.1	
4/18/2019	BBK	Reviewing JY update regarding call with named Plaintiff.	0.1	
4/18/2019	JSY	Conf. w/ KES re document review.	0.1	
4/18/2019	JSY	T/C with J. Algarme; emails with team re same.	0.3	
4/18/2019	KES	Review and code client documents for production.	4.5	
4/19/2019	GCG	Meet w/ BBK, JY and KES to discuss document review and class cert declarations.	0.4	
4/19/2019	GCG	Conf w/ named plaintiff BJH re status.	0.3	
4/19/2019	GCG	Draft memo to team re Scotts Valley; email team re same.	0.2	
4/19/2019	BBK	Conferring with team regarding scheduling team meeting.	0.1	
4/19/2019	BBK	Team meeting with GCG, JY and KES.	0.3	
4/19/2019	BBK	Reviewing GCG memo regarding call with named plaintiff; reviewing recent press in East Bay Times and KQED.	0.1	
4/19/2019	JSY	Update to do list; team meeting.	0.6	
4/19/2019	JSY	Emails regarding Defs' production.	0.1	
4/19/2019	KES	Team meeting regarding case status, document review.	0.4	
4/23/2019	KES	Review communications from client and update memo regarding same.	0.4	
4/23/2019	KES	Review and code client documents for production.	3.3	
4/24/2019	GCG	Emails to JY and team re memos to file re JA and GW conversations.	0.1	
4/24/2019	GCG	Email to MJ and defendant re PO.	0.1	
4/24/2019	GCG	Conf w/ and email to GW re mediation discovery and class cert. declarations; draft memo to file re same.	0.5	
4/24/2019	GCG	Attend to expert conflict checks.	0.4	
4/24/2019	JSY	Conflicts checks for potential experts.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2019	KES	Update client contact information.	0.2	
4/24/2019	KES	Review emails re experts and mediation.	0.1	
4/25/2019	GCG	Review proposed site inspection list for experts.	0.1	
4/25/2019	GCG	Email to KES and team re same.	0.1	
4/25/2019	BBK	Reviewing GCG memo regarding call with G. Wallace; communications with team regarding options for site inspections of BD facilities.	0.1	
4/25/2019	KES	Review documents and memos for possible additional inspection sites.	0.4	
4/26/2019	GCG	Research for inspections.	0.2	
4/26/2019	GCG	Emails to GW and team re same.	0.2	
4/26/2019	GCG	Email to MJ and team re defendants' response to request for production.	0.1	
4/26/2019	JSY	Conf. with KES regarding site inspections.	0.1	
4/26/2019	KES	Review emails regarding site inspections.	0.1	
4/27/2019	GCG	Review and analyze defendants' responses and objections to 1st Request for Production of documents.	0.2	
4/27/2019	GCG	Email to GW and team re same.	0.1	
4/29/2019	GCG	Emails to GW and team regarding defendants' RFP responses.	0.2	
4/29/2019	JSY	Emails re discovery responses.	0.1	
4/29/2019	JSY	Document review.	1.0	
4/30/2019	GCG	Conduct call with co-counsel regarding defendant's discovery responses and notices of inspection.	1.0	
4/30/2019	GCG	Revise same and interrogatories; email to MJ regarding same.	0.2	
4/30/2019	GCG	Review MJ email to opposing counsel; email MJ regarding same.	0.1	
4/30/2019	GCG	Email to GW and team regarding meet and confer schedules.	0.1	
4/30/2019	JSY	Document review.	2.1	
4/30/2019	JSY	Review draft discovery.	0.3	
4/30/2019	JSY	Review responses to RFP Set One.	0.9	
4/30/2019	JSY	T/C with co-counsel regarding RFP responses and next steps.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/1/2019	GCG	Review special interrogatories, requests for production and notices of inspections.	0.2	
5/1/2019	GCG	Emails to MJ and team regarding finalizing and service of same.	0.2	
5/1/2019	JSY	Document review.	1.0	
5/1/2019	KES	Update electronic files.	0.1	
5/2/2019	GCG	Emails to MJ and defendants regarding protective order and meet and confer.	0.1	
5/2/2019	GCG	Review court order.	0.1	
5/2/2019	BBK	Reviewing stipulated protective order; service of notice of inspection of BD facilities.	0.1	
5/2/2019	KES	Download and circulate pleading.	0.1	
5/3/2019	GCG	Review MJ memo to file regarding defendants' document production.	0.1	
5/3/2019	GCG	Conf with JY regarding updating case deadlines and to do list.	0.1	
5/3/2019	JSY	Update to do list.	0.1	
5/3/2019	KES	Review memo regarding defendants document production.	0.1	
5/4/2019	GCG	Review and analyze case related to ADA defenses.	0.2	
5/5/2019	GCG	Continued review and analysis of case shared by GW.	0.1	
5/5/2019	BBK	Reviewing M. Johnson report regarding review of initial production by Defendants.	0.1	
5/7/2019	GCG	Email to TC and team regarding preparation for meet and confer.	0.1	
5/7/2019	JSY	Emails regarding prep. for meet and confer call.	0.1	
5/8/2019	GCG	Participate in meet and confer calls with co-counsel and opposing counsel regarding RFP issues.	1.8	
5/8/2019	JSY	Prep for meet and confer call regarding RFP responses; call with opposing counsel regarding same.	1.8	
5/9/2019	GCG	Research and draft memo to GW and team regarding potentially problematic case.	0.3	
5/9/2019	GCG	Research and draft portion of letter to opposing counsel regarding specificity of discovery requests; email to TC and team regarding same.	0.3	
5/9/2019	GCG	Emails to MJ and JY regarding follow up call with defendants regarding discovery requests and meet and confer.	0.2	
5/9/2019	JSY	Emails regarding next meet and confer call with Defendants.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 199

SERVICES

Date	Person	Description of Services	Hours	Discount
5/10/2019	FFV	(Reduced Charge) Review article " Assisted living costs", and save to the DMS.	0.2	0.1
5/13/2019	GCG	Conf with SG regarding Fountaingrove issues.	0.1	
5/13/2019	GCG	Research regarding DOJ lawsuit based on ADA.	0.1	
5/13/2019	GCG	Email to JC and team regarding meet and confer follow up.	0.1	
5/14/2019	GCG	Conf with and emails to JY regarding letter to defendants regarding document request responses.	0.1	
5/14/2019	GCG	Emails to MJ and defendants regarding next meet and confer call.	0.1	
5/14/2019	BBK	Conferring with JY regarding document tagging in Relativity.	0.1	
5/14/2019	BBK	Analyzing/tagging client documents in Relativity for initial disclosure production.	2.7	
5/14/2019	JSY	Conf. with BBK and KES regarding DSS complaint and regarding document review.	0.3	
5/14/2019	JSY	Conf. with TC regarding letter clarifying doc requests; emails with GCG regarding same.	0.1	
5/14/2019	FFV	(Reduced Charge) Review article regarding complex access issues; and save to the DMS.	0.2	0.1
5/14/2019	KES	Review and circulate new DSS complaint regarding Fountaingrove.	0.1	
5/15/2019	GCG	Review chart of Brookdale facilities; email with MJ and team regarding same.	0.1	
5/15/2019	GCG	Emails to JY and MJ regarding upcoming meet and confer with defendants.	0.1	
5/15/2019	BBK	Analyzing/tagging client docs in Relativity for initial disclosures.	0.5	
5/15/2019	JSY	Emails regarding M+C call.	0.1	
5/16/2019	GCG	Emails to TC and MJ regarding upcoming meet and confer and response to defendants.	0.2	
5/16/2019	BBK	Analyzing and tagging client docs in Relativity.	1.9	
5/17/2019	GCG	Emails to MJ and team regarding revisions to communication to defendants' counsel regarding RFP response.	0.2	
5/17/2019	JSY	Emails regarding letter regarding meet and confer issues.	0.1	
5/20/2019	GCG	Conf with and emails to MJ regarding meet and confer call with defendants.	0.2	
5/20/2019	GCG	Review JY notes of call; email to JY regarding same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/20/2019	BBK	Reviewing JY report regarding meet and confer call with Defendants.	0.1	
5/20/2019	JSY	Prep. for, conduct, and document meet and confer call.	2.1	
5/20/2019	KES	Review email regarding meet and confer.	0.1	
5/21/2019	GCG	Conf with JY and email to GW regarding preparation for oral argument against Brookdale motion to stay.	0.2	
5/21/2019	JSY	Conf. with GCG regarding prep. for hearing regarding motion for stay; emails regarding same.	0.1	
5/22/2019	GCG	Initial review of defendants' production; email to JY and team regarding same.	0.2	
5/22/2019	KES	Review correspondence regarding document production.	0.1	
5/23/2019	JSY	Prep. for hearing regarding motion for stay.	0.2	
5/23/2019	FFV	(Reduced Charge) Download cited cases re motion to stay regarding Defs/ NOM, and save to the DMS.	2.0	1.0
5/24/2019	JSY	Prep. for motion for stay hearing.	1.0	
5/24/2019	FFV	(Reduced Charge) Download cited cases from Dkt 111 regarding Pltfs' Opp, and save to the DMS.	2.0	4.0
5/26/2019	GCG	Review and analyze case related to appeal.	0.2	
5/26/2019	JSY	Prep. for motion for stay hearing.	1.0	
5/27/2019	GCG	Review and analyze Reply ISO Stay; email JY regarding same.	0.3	
5/27/2019	GCG	Prepare questions for JSY oral argument "moot".	0.3	
5/27/2019	GCG	Review emails MJ-Defendants regarding meet & confer issues.	0.2	
5/27/2019	GCG	Review letter from JB regarding document production.	0.1	
5/27/2019	JSY	Prep. for motion for stay hearing.	2.3	
5/28/2019	GCG	Review court order regarding motion for stay.	0.1	
5/28/2019	GCG	Conference with JY and email GW regarding court order regarding motion for stay.	0.1	
5/28/2019	GCG	Email MJ-Defendants regarding meet & confer.	0.1	
5/28/2019	BBK	Reviewing Clerk's Notice removing oral argument on motion to stay from calendar and taking briefing under submission & notice of filing of motion to extend briefing deadline for 9th Cir appeal.	0.1	
5/28/2019	JSY	Prep. for stay hearing.	1.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/28/2019	FFV	Prepare binder for JY oral argument.	0.4	
5/28/2019	KES	Circulate appellate notice regarding briefing schedule and update calendar deadlines.	0.2	
5/29/2019	GCG	Emails MJ-Defendants regarding site inspections and further meet & confer regarding discovery.	0.2	
5/29/2019	GCG	Analyze Defendants' proposal for inspections.	0.2	
5/29/2019	KES	Download and circulate pleading.	0.1	
6/3/2019	GCG	Email to MJ, JY and team regarding meet and confer with defendants and facility inspections.	0.1	
6/3/2019	BBK	Reviewing communications with co-counsel regarding staffing of site inspections and meeting/conferring with Defendants on discovery disputes; JY update regarding call with named plaintiff.	0.1	
6/3/2019	JSY	Telephone conference with JA regarding status; emails regarding same; draft memo regarding same.	0.4	
6/5/2019	GCG	Prepare for upcoming facility inspection with expert.	0.5	
6/5/2019	GCG	Confs with GW and MJ and emails to team regarding same and e protocol/approach.	0.3	
6/5/2019	GCG	Emails to MJ and defendants regarding inspection issues.	0.2	
6/5/2019	GCG	Review and analyze court order denying stay and interlocutory appeal; follow up to same.	0.5	
6/5/2019	BBK	Reviewing court order denying motion to stay pending appeal of denial of motion to compel arbitration and denying motion to certify interlocutory appeal on ADA ruling.	0.2	
6/5/2019	KES	Download and circulate order and calendar deadlines.	0.2	
6/6/2019	GCG	Prepare for inspection of Brookhurst.	0.4	
6/6/2019	GCG	Review facility plans; conf with KES regarding same.	0.2	
6/6/2019	GCG	Emails to JY, JA and BJH regarding inaccessible features and inspections.	0.2	
6/6/2019	GCG	Emails to MJ, GW and experts regarding same.	0.2	
6/6/2019	GCG	Participate in meet and confer with defendants' counsel.	1.0	
6/6/2019	GCG	Run conflicts check on new defendant lawyer.	0.1	
6/6/2019	GCG	Review discovery requests and meet and confer letters in preparation for motion to compel.	0.1	
6/6/2019	GCG	Conf with SG regarding Fountaingrove issues; email to SG and MH regarding same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 202

SERVICES

Date	Person	Description of Services	Hours	Discount
6/6/2019	GCG	Draft chronology.	0.1	
6/6/2019	JSY	Emails and conf. regarding order on motion to stay and motion for interlocutory appeal; emailed class reps. regarding same.	0.4	
6/6/2019	JSY	Emails regarding site inspections.	0.2	
6/6/2019	KES	Download plans produced by defendants and arrange for copies to be printed; review and confer GCG re same.	1.7	
6/6/2019	KES	Gather expert materials in preparation for inspections.	0.5	
6/7/2019	GCG	Prepare for and conduct call with co-counsel and experts regarding inspections.	1.3	
6/7/2019	GCG	Research regarding accessibility issues at Brookhurst.	0.5	
6/7/2019	GCG	Conf with JA regarding same.	0.5	
6/7/2019	GCG	Draft memos regarding same.	0.6	
6/7/2019	GCG	Emails with GW regarding accessibility inspection.	0.2	
6/7/2019	GCG	Factual research; review article from KS and email team regarding same.	0.1	
6/7/2019	GCG	Emails with JY and class members regarding order and inspections.	0.3	
6/7/2019	FFV	Review article; circulate and save to the DMS.	0.4	
6/7/2019	KES	Update electronic inspection files.	0.2	
6/10/2019	GCG	Review Brookhurst materials and prepare for inspection.	0.3	
6/10/2019	GCG	Conf with and emails to JY and KES.	0.2	
6/10/2019	GCG	Conf with JA regarding same.	0.3	
6/10/2019	GCG	Emails to GW and MJ regarding discovery meet and confer and follow up.	0.2	
6/10/2019	JSY	Conf. with GCG regarding site inspections; emails regarding same.	0.2	
6/10/2019	JSY	Review June 5 order.	0.3	
6/10/2019	KES	Update electronic files.	0.3	
6/10/2019	KES	Online research regarding Broohkurst inspections.	0.1	
6/11/2019	GCG	(Reduced Charge) Travel to and from Westminster, CA for site inspection.	3.0	3.0
6/11/2019	GCG	Meet with expert and prepare for inspection.	1.0	
6/11/2019	GCG	Conduct inspection of Brookhurst facility with expert JM.	6.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 203

SERVICES

Date	Person	Description of Services	Hours	Discount
6/11/2019	GCG	Confs with and emails with MJ and JC regarding meet and confer issues and disputes with JK.	0.3	
6/11/2019	GCG	Meet with and texts JA regarding accessibility issues at Brookhurst.	1.0	
6/11/2019	JSY	Emails regarding Brookhurst site inspection.	0.1	
6/11/2019	JSY	Review email regarding meet and confer process.	0.1	
6/12/2019	GCG	Research and draft meet & confer letter regarding inspection issues.	1.5	
6/12/2019	GCG	Emails with GW, MJ, SE, JSY and conference with SC regarding inspection issues.	0.2	
6/12/2019	GCG	Research and draft memorandum to file regarding inspection of Brookhurst.	1.5	
6/12/2019	GCG	Conference and emails with TC regarding Oceanside inspection.	0.5	
6/12/2019	JSY	Conf. with GCG regarding Brookhurst inspection; review letter regarding same.	0.2	
6/12/2019	JSY	Conf. with GCG regarding site inspection of Brookhurst.	0.2	
6/12/2019	JSY	Research regarding communications with putative class members pre-class certification; email GCG regarding same.	1.0	
6/12/2019	KES	Review documents re Brookhurst wheelchair accessibility.	0.8	
6/12/2019	KES	Update electronic inspection files.	0.2	
6/12/2019	KES	Review correspondence and emails re inspections.	0.2	
6/13/2019	GCG	Review and comment on TC memo regarding Oceanside inspection.	0.1	
6/13/2019	GCG	Emails with MJ and team regarding next inspections.	0.1	
6/13/2019	GCG	Conference with LB regarding recent order.	0.1	
6/13/2019	BBK	Reviewing article shared by C. Whitaker regarding Brookdale litigation.	0.1	
6/13/2019	JSY	Emails regarding press regarding Brookdale litigation.	0.1	
6/13/2019	JSY	Emails regarding publication of order denying stay and motion for interlocutory appeal.	0.1	
6/13/2019	JSY	Emails regarding site inspections.	0.1	
6/13/2019	KES	Update electronic files.	0.2	
6/14/2019	GCG	Review and comment on TC memo on third day of inspections.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/14/2019	GCG	Conference and emails with MJ regarding Riverwalk and other inspections.	0.5	
6/14/2019	GCG	Research regarding Riverwalk and Corona; prepare for inspections.	0.6	
6/14/2019	GCG	Email JSY regarding Windsor inspection.	0.1	
6/14/2019	KES	Online research and gather and organize facility information in preparation for inspections.	1.2	
6/15/2019	GCG	Research regarding Riverwalk facility.	0.1	
6/16/2019	GCG	Revise and issue memorandum regarding inspection of Brookhurst.	0.1	
6/16/2019	GCG	Email to expert, co-counsel and defense counsel regarding inspection of Riverwalk.	0.2	
6/16/2019	GCG	Prepare for same.	0.2	
6/16/2019	GCG	(Reduced Charge) Travel to Bakersfield.	1.7	1.8
6/16/2019	GCG	Review article regarding Brookdale lawsuits and issues.	0.1	
6/16/2019	GCG	Review TC memoranda regarding inspections of San Marcos and Clairemont.	0.2	
6/16/2019	GCG	Organize photos of Brookhurst.	0.1	
6/17/2019	GCG	(Reduced Charge) Travel from hotel to Riverwalk.	0.1	0.2
6/17/2019	GCG	Meet with expert and opposing counsel; inspect facility.	7.0	
6/17/2019	GCG	(Reduced Charge) Travel from facility home; conf with co-counsel and emails to team enroute.	2.8	2.8
6/18/2019	GCG	Prepare for Riverside inspection; emails to MJ and JK regarding same.	0.4	
6/18/2019	GCG	Confs with and emails to JY regarding preparation for Windsor.	0.5	
6/18/2019	GCG	Email expert regarding Windsor inspection.	0.1	
6/18/2019	GCG	Draft letter to putative class member; email to MJ and team regarding same.	0.2	
6/18/2019	GCG	Draft letter to JK regarding Brookhurst.	0.1	
6/18/2019	GCG	Emails to JC, MJ and team regarding inspection and meet and confer issues.	0.2	
6/18/2019	GCG	Research and draft memorandum to file regarding Riverwalk inspection.	0.7	
6/18/2019	GCG	Conf with BH regarding case chronology and draft class declarations.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/18/2019	GCG	Email to SG regarding Fountaingrove inspection.	0.1	
6/18/2019	JSY	Prep for site inspection of Windsor.	3.0	
6/18/2019	JSY	T/C with multiple residents and former residents regarding same.	1.0	
6/18/2019	JSY	Conf. w/ GCG multiple times regarding same.	0.2	
6/18/2019	JSY	Research regarding same.	0.7	
6/18/2019	BCH	Confer with GG regarding Brookdale inspection and initial project.	0.4	
6/19/2019	GCG	Emails and texts with JY regarding Windsor and Riverside inspections; conf with JY regarding same.	0.2	
6/19/2019	GCG	Draft and revise memorandum to file regarding Riverwalk inspection.	0.9	
6/19/2019	GCG	Attend to saving Riverwalk photographs.	0.2	
6/19/2019	GCG	Emails to GW and team regarding defendants' expert.	0.2	
6/19/2019	GCG	Send letter to JK regarding badge.	0.2	
6/19/2019	BCH	Memo regarding Brookdale chronology of key dates.	3.5	
6/19/2019	JSY	(Reduced Charge) Travel to and from Windsor for site inspection.	2.0	2.0
6/19/2019	JSY	Site inspection of Windsor facility.	8.0	
6/19/2019	FFV	Scan and save to the DMS floor plan.	0.2	
6/19/2019	FFV	Download and save to the DMS article regarding Brookdale senior living.	0.3	
6/19/2019	FFV	(Billing Judgment) Print emailed docs for JY.	0.0	0.3
6/19/2019	FFV	(Billing Judgment) Download, email and save to the DMS app and order regarding admission of JK.	0.0	0.4
6/20/2019	GCG	Conf with JY regarding follow up from inspections.	0.1	
6/20/2019	JSY	Draft memo regarding site inspection; emails regarding photographs of same.	3.5	
6/20/2019	JSY	Emails with J. Algarme regarding recent developments.	0.1	
6/20/2019	JSY	Supplemental conflicts check.	0.1	
6/20/2019	JSY	T/C with fiduciary for class member; conf. w/ GCG regarding same.	0.2	
6/22/2019	GCG	Emails to MJ and team regarding Jeff K "confirmation" of inspections.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/23/2019	GCG	Review and revise BH case chronology.	0.1	
6/23/2019	GCG	Review and revise memo to file regarding Riverwalk.	0.1	
6/23/2019	GCG	Emails to MJ and JK regarding inspections.	0.1	
6/24/2019	GCG	Prepare for and conduct meet and confer pursuant to III. 4. w/ JB re RFPs 1 and 10 and site inspections.	1.0	
6/24/2019	GCG	Follow up conferences and emails w/ GW and team re next steps.	0.1	
6/24/2019	GCG	Email to JY and team re memo on Riverwalk.	0.2	
6/24/2019	GCG	Conf w/ potential class member.	0.1	
6/24/2019	GCG	Emails to MJ and team re upcoming inspections.	0.1	
6/24/2019	BBK	Reviewing GCG memo regarding inspection of BD Riverwalk facility in Bakersfield with opposing counsel and expert.	0.2	
6/24/2019	JSY	Edit Riverwalk memo; emails regarding same.	0.2	
6/24/2019	KES	Review emails regarding facility inspections and update electronic files with docs and photos regarding same.	0.5	
6/24/2019	BCH	Revise key dates memo.	1.5	
6/25/2019	GCG	Summarize call with son of potential named plaintiffs for team.	0.1	
6/25/2019	GCG	Email to RC and team re follow up to call.	0.1	
6/25/2019	GCG	Draft letter to JB re meet and confer call.	0.1	
6/25/2019	GCG	Draft stipulation re assisted living units' inspection.	0.1	
6/25/2019	BBK	Reviewing GCG report regarding contact with potential named plaintiffs at Brookdale facilities.	0.1	
6/25/2019	KES	Review emails w relative of Brookdale resident.	0.1	
6/25/2019	KES	Update electronic files.	0.1	
6/26/2019	GCG	Draft and revise letter to JB regarding inspections; email to GW and team regarding same.	0.5	
6/26/2019	GCG	Draft stipulation regarding resident room inspections.	0.2	
6/26/2019	GCG	Email to SC regarding Brookdale "resident" survey.	0.1	
6/26/2019	BBK	Conferring with RBGG team regarding status of document coding project; reviewing S. Colby report regarding Brookdale resident survey and attempts to buy off Stiner.	0.1	
6/26/2019	KES	Review email regarding client communication and document and arrange for upload of additional client document to Relativity.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/26/2019	KES	Telephone call with relative of Brookdale resident and email to team regarding same.	0.3	
6/26/2019	KES	Review recent DSS reports regarding additional Brookdale facilities.	0.2	
6/26/2019	KES	Review and organize inspection memos.	0.2	
6/27/2019	GCG	Revise and send meet and confer follow up letter and draft stipulation to JB.	0.7	
6/27/2019	GCG	Emails to GW and team regarding same.	0.3	
6/27/2019	BBK	Reviewing GCG update re drafting joint discovery dispute letter for MJ Beeler and F/U meet and confer letter to Defendants re dispute over inspections of resident rooms.	0.2	
6/27/2019	JSY	T/C with witness regarding Windsor; emails regarding same.	0.2	
6/27/2019	KES	Email co-counsel regarding document production.	0.1	
6/27/2019	KES	Review correspondence regarding meet and confer.	0.1	
6/28/2019	GCG	Review and revise GW draft letter regarding RFP #1 and #10.	0.3	
6/28/2019	GCG	Emails to GW and team regarding same.	0.2	
6/28/2019	GCG	Conf with and emails to JSY and KES regarding potential new plaintiff need to reach other plaintiffs and upcoming meet and confer letter briefing.	0.2	
6/28/2019	JSY	Meeting re case tasks; emails re same.	0.4	
6/28/2019	KES	Meeting re case status, tasks.	0.3	
6/28/2019	KES	Update electronic files.	0.1	
7/1/2019	GCG	Revise stipulation to extend time to file meet and confer letter.	0.2	
7/1/2019	GCG	Emails to GW and JB regarding same.	0.1	
7/1/2019	GCG	Review TC research regarding statistical sampling.	0.2	
7/1/2019	GCG	Meet w/ family member of potential class reps; brief review of documents.	0.1	
7/1/2019	BBK	Reviewing stipulation to postpone deadline to file joint discovery dispute letter to MJ.	0.1	
7/1/2019	JSY	Draft meet and confer letter for Judge Beeler.	0.9	
7/1/2019	KES	Meet with potential declaration/client; brief review of documents provided.	0.4	
7/1/2019	KES	Download and circulate pleading.	0.1	
7/2/2019	GCG	Review email from MJ regarding upcoming inspections.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/2/2019	GCG	Emails to GW regarding same and regarding draft meet and confer letter.	0.1	
7/2/2019	GCG	Confs with JY and KES regarding same and regarding San Jose facility.	0.1	
7/2/2019	BBK	Reviewing DSS complaint investigation report regarding complaint at BD San Jose forwarded by KES.	0.1	
7/2/2019	BBK	Reviewing communications with opposing counsel and internal communications regarding next set of expert inspections of BD facilities.	0.1	
7/2/2019	JSY	Research and draft M+C letter; conf. w/ GCG re same.	1.7	
7/2/2019	KES	Arrange for copy of original documents from resident of Brookdale.	0.2	
7/2/2019	KES	Review and circulate new DSS report re Brookdale facility.	0.1	
7/2/2019	KES	(Billing Judgment) Calendar deadlines.	0.0	0.1
7/3/2019	GCG	Review and revise draft letter to MJ Beeler re inspection disputes; email to GW re same.	1.0	
7/3/2019	GCG	Review and revise draft class member decls ISO class cert.	0.2	
7/3/2019	GCG	Conf w/ JY and BH re same.	0.2	
7/3/2019	GCG	Email to witness MH re status.	0.1	
7/3/2019	GCG	Email to GW and team re issues at San Jose facility and potential new class rep.	0.2	
7/3/2019	BCH	Research for class member declaration.	0.7	
7/3/2019	JSY	Meeting with BH regarding class certification declarations; conf. with GCG regarding same.	0.5	
7/3/2019	KES	Brief review of scanned documents from Brookdale resident.	0.2	
7/3/2019	BCH	Confer with JY regarding class member declarations.	0.4	
7/4/2019	GCG	Emails to GW, KS and JY re response to defendants' inquiry re appendix.	0.2	
7/4/2019	GCG	Draft email to MJ re appendix contents; review response.	0.3	
7/5/2019	GCG	Emails to GW re CMC and class cert declarations.	0.2	
7/5/2019	GCG	Conf w/ JY and KES re class member at San Jose.	0.1	
7/5/2019	GCG	Conf w/ and emails to JY and KES re defendants' brief and appendix.	0.2	
7/5/2019	JSY	Research regarding stay motion.	0.3	
7/5/2019	JSY	Conf. w/ GCG regarding same.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 209

SERVICES

Date	Person	Description of Services	Hours	Discount
7/5/2019	JSY	Emails regarding same.	0.3	
7/5/2019	BCH	Research for class member declaration.	0.6	
7/5/2019	FFV	Scan, save to the DMS and email to the group article regarding ADA.	0.3	
7/5/2019	KES	Send documents back to potential class member and email to same.	0.3	
7/5/2019	KES	Meet regarding case status.	0.1	
7/5/2019	KES	Scan and circulate legal article.	0.1	
7/6/2019	GCG	Email JY and MJ re stay petition and appellate brief filing.	0.1	
7/6/2019	JSY	Review stay motion; emails regarding research regarding same.	0.3	
7/7/2019	GCG	Review and analyze motion for stay.	0.3	
7/7/2019	GCG	Email to JY and BH re same.	0.2	
7/8/2019	GCG	Conf w/ and emails to GW re inspections, motions to compel, and CMC statement.	1.0	
7/8/2019	GCG	Review and revise CMC statement.	0.2	
7/8/2019	GCG	Comment on defendants' section of motion to compel.	0.2	
7/8/2019	GCG	Prepare for next round of inspections.	0.2	
7/8/2019	GCG	Review and circulate McKnight's article.	0.2	
7/8/2019	GCG	Email to MJ re follow up to June 27 letter and stipulation.	0.2	
7/8/2019	GCG	Email to JY and BH re opposition to stay.	0.3	
7/8/2019	GCG	Begin drafting Grunfeld decl; conf w/ GW re same.	0.2	
7/8/2019	GCG	Review court orders.	0.2	
7/8/2019	BBK	Reviewing communications w/ team re Defendants 9th Cir motion to stay pending appeal; reviewing McKnight article on lawsuit distributed to team.	0.1	
7/8/2019	BBK	Reviewing communications w/ opposing counsel re CMC statement deadline and needed revisions.	0.1	
7/8/2019	BBK	Reviewing communications w/ opposing counsel re discovery letter brief.	0.1	
7/8/2019	BCH	Research for brief opposing appeal of arbitration denial.	6.9	
7/8/2019	JSY	Emails re response to stay motion.	0.1	
7/8/2019	KES	Download and circulate ninth circuit brief and appendix.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/8/2019	KES	Update electronic files.	0.1	
7/9/2019	GCG	Review and analyze BH memorandum analyzing new cases cited in defendants' motion for stay.	0.7	
7/9/2019	GCG	Conf w/ BH and emails to JY and KES re same.	0.2	
7/9/2019	GCG	Prepare Grunfeld decl IOT stay.	0.1	
7/9/2019	GCG	Review changes to CMC statement.	0.3	
7/9/2019	GCG	Confs w/ and emails to GW re filing same.	0.3	
7/9/2019	GCG	Review and revise stipulation to inspect rooms.	0.3	
7/9/2019	GCG	Conf w/ and email to GW re same.	0.2	
7/9/2019	GCG	Review defendants' changes to motion to compel letter; emails re same.	0.2	
7/9/2019	GCG	Conf w/ and email to JY re problems at Brookdale Sacramento.	0.1	
7/9/2019	GCG	Prepare for upcoming inspections; emails to SC, JM and KES re same.	0.3	
7/9/2019	GCG	Review potential client ARB agreement.	0.1	
7/9/2019	LAE	Emails with GG regarding Ninth Circuit procedural question regarding stay motion.	0.1	
7/9/2019	BBK	Reviewing G. Wallace communications w/ opposing counsel re Defendants' inappropriate tactics w/r/t to discovery dispute joint letter brief.	0.1	
7/9/2019	BBK	Reviewing Defendants' letter responding to GCG re scope of inspections of BD communities and proposed stipulation.	0.2	
7/9/2019	JSY	Review memo re motion for stay.	0.3	
7/9/2019	KES	Review documents from relative of Brookdale resident and email team re same.	0.2	
7/9/2019	KES	Gather documents in preparation for inspection.	0.3	
7/9/2019	KES	Review new DSS report re Brookdale facility.	0.1	
7/9/2019	KES	Update electronic files.	0.1	
7/9/2019	BCH	Drafting of memo re brief opposing appeal of arbitration denial.	7.3	
7/10/2019	GCG	Research and draft Grunfeld declaration IOT stay.	0.5	
7/10/2019	GCG	Confs w/ JSY and emails to GW, BH and KES re stay rules, declaration and plan for opposition.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/10/2019	GCG	Review defendants' revisions to letter brief re motion to compel.	0.4	
7/10/2019	GCG	Conf w/ and emails to GW, MJ and TC re same and re inspections.	0.4	
7/10/2019	GCG	Email to MJ re memory care dispute and inspections.	0.2	
7/10/2019	GCG	Emails to BB and GW re motion to compel brief.	0.2	
7/10/2019	GCG	Email to RC and KES re San Jose facility.	0.2	
7/10/2019	GCG	Email w/ LB re class cert schedule.	0.1	
7/10/2019	GCG	Email to MJ re Fountaingrove.	0.1	
7/10/2019	LAE	Conf and email with JSY regarding previous stay briefing in 9th Cir, locate and send same.	0.2	
7/10/2019	BBK	Reviewing declaration ISO undue burden argument submitted by Defendants.	0.1	
7/10/2019	BBK	Reviewing G. Wallace/opposing counsel communications re revisions to joint letter brief and inappropriateness of including declarations & revisions to brief.	0.2	
7/10/2019	BBK	Reviewing further joint CMC statement filed today.	0.1	
7/10/2019	BCH	Research for brief opposing appeal of arbitration denial.	0.8	
7/10/2019	JSY	Draft Response to Motion for Stay; conf. w/ GCG and LAE re same.	4.5	
7/10/2019	KES	Telephone call and email with relative of Brookdale resident.	0.4	
7/10/2019	KES	Download and circulate CMC stm.	0.1	
7/10/2019	KES	Review and gather information for preparation of opposition to motion for stay.	1.4	
7/11/2019	GCG	Research and draft Grunfeld decl IOT stay.	1.0	
7/11/2019	GCG	Confs w/ and emails to JY and KES re same.	0.2	
7/11/2019	GCG	Research re Brookdale Board of Directors.	0.2	
7/11/2019	GCG	Revise resident room stipulation.	0.4	
7/11/2019	GCG	Confs w/ MJ and emails to JB re same and re memory care dispute.	0.2	
7/11/2019	GCG	Emails to GW and team re discovery hearing.	0.2	
7/11/2019	GCG	Conf w/ MJ and emails to SC, GW and JY re inspections.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/11/2019	BBK	Reviewing Order setting discovery dispute hearing; internal communications re scheduling additional BD inspections; communications w/ opposing counsel re telephonic meet and confer.	0.1	
7/11/2019	JSY	Draft Response to Motion for Stay; edits re same; conf. re same.	6.4	
7/11/2019	KES	Review document production information in connection with opposition to motion for stay.	0.8	
7/12/2019	EG	Review and edit the 9th Cir stay opposition.	0.4	
7/12/2019	GCG	Research and revise draft opposition to stay.	1.1	
7/12/2019	GCG	Confs w/ JSY and KES re same.	0.2	
7/12/2019	GCG	Email to JSY and MJ re revisions.	0.1	
7/12/2019	GCG	Prepare for and participate in meet and confer pursuant to standing order re memory care and resident rooms.	0.8	
7/12/2019	GCG	Research and draft letter brief re memory care dispute.	0.6	
7/12/2019	GCG	Emails to MJ, SC and team re upcoming inspections.	0.1	
7/12/2019	GCG	Email to BJH re Scotts Valley Inspection.	0.1	
7/12/2019	BBK	Reviewing communications re Brookdale inspections.	0.1	
7/12/2019	JSY	Draft and edit Response to Motion for Stay and GCG Decl. ISO; multiple conf. and emails re same.	5.2	
7/12/2019	KES	Review documents and information for opposition for motion to stay.	1.1	
7/12/2019	BCH	Confer with JY re additional research.	0.2	
7/12/2019	BCH	Editing brief opposing appeal of arbitration denial.	2.1	
7/14/2019	GCG	Review stay motion; email to JSY re opposition.	0.1	
7/15/2019	GCG	Emails to BJH and JSY re inspections.	0.2	
7/15/2019	GCG	Conf w/ and email to putative class member re lack of adequate caregivers at Brookdale San Jose.	0.4	
7/15/2019	GCG	Research and revise joint letter brief re memory care dispute.	0.4	
7/15/2019	GCG	Conf w/ MJ and emails to GW and team re same.	0.2	
7/15/2019	GCG	Emails to defendants re joint letter brief.	0.1	
7/15/2019	GCG	Revise and oversee e-filing of Grunfeld Decl IOT stay.	0.4	
7/15/2019	GCG	Revise MPAs IOT stay.	0.7	
7/15/2019	GCG	Confs w/ JSY and emails to MJ and team re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/15/2019	BBK	Reviewing JY communications w/ co-counsel re revising/filing opposition to motion to stay.	0.1	
7/15/2019	JSY	Emails re letter brief re memory care; research re same.	0.4	
7/15/2019	JSY	Emails re inspection of Scotts Valley.	0.1	
7/15/2019	JSY	Draft, edit, and finalize Response to Motion for Stay; multiple conf. and emails re same.	4.5	
7/15/2019	FFV	Prepare exhibits to GCG's decl.	0.6	
7/15/2019	KES	Review and respond to email from relative of Brookdale resident; confer GCG re same.	0.4	
7/15/2019	KES	Finalize and file opposition to motion for stay.	0.4	
7/16/2019	GCG	(Reduced Charge) Travel to conduct CMC conference and follow up meeting w/ co-counsel re discovery issues and class cert motion.	0.5	0.5
7/16/2019	GCG	Draft and revise stipulation to extend time to file memory care brief.	0.8	
7/16/2019	GCG	Confs w/ JB and MJ and email to defendants re same.	0.2	
7/16/2019	GCG	Oversee e-filing of stipulation.	0.1	
7/16/2019	GCG	Emails to TC and JK re inspections.	0.1	
7/16/2019	GCG	Emails to GW and team re dates for mediation w/ Judge Infante.	0.2	
7/16/2019	GCG	Conduct CMC conference and follow up meeting w/ co-counsel re discovery issues and class cert motion.	1.0	
7/16/2019	BBK	Reviewing communications w/ co-counsel and opposing counsel re discovery letter brief on dispute over BD inspections of memory care units & stipulation setting different briefing schedule that mandated by MJ Beeler's standing order.	0.2	
7/16/2019	BBK	Reviewing Opposition to Motion to Stay pending appeal and GCG supporting declaration.	0.2	
7/16/2019	JSY	Emails and calls re Scotts Valley inspection.	0.1	
7/16/2019	JSY	Emails re mediation.	0.1	
7/16/2019	KES	Finalize, file and send proposed order re stipulation.	0.4	
7/17/2019	GCG	Conf w/ and emails to JY re inspection of Scotts Valley.	0.1	
7/17/2019	GCG	Prepare for hearing before Judge Beeler.	0.1	
7/17/2019	GCG	Emails to MJ and team re same and re other discovery issues, including memory care and resident room disputes.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/17/2019	GCG	Review JB explanation for Resident Room stipulation.	0.1	
7/17/2019	GCG	Review Brookdale revisions to resident room stip; email to GW re same.	0.1	
7/17/2019	GCG	Review Brookdale Section of MC letter brief.	0.1	
7/17/2019	GCG	Review Judge Gillian's class cert scheduling order.	0.1	
7/17/2019	BBK	Reviewing court's orders granting parties' stipulation re briefing of discovery dispute; setting case schedule for briefing of class certification motion.	0.1	
7/17/2019	JSY	Prep. for Scotts Valley inspection; t/c with BJH re same.	0.9	
7/17/2019	JSY	Review Opening Brief.	0.5	
7/17/2019	KES	Download and circulate order.	0.1	
7/17/2019	KES	Gather materials for Scotts Valley site inspection.	1.5	
7/17/2019	KES	Update electronic files.	0.1	
7/17/2019	BCH	Reviewing JY's notes on memo.	0.2	
7/18/2019	GCG	Confs w/ and emails to GW and MJ re resident room inspection stipulation and memory care dispute letter.	0.6	
7/18/2019	GCG	Emails to KES re rescheduled discovery hearing.	0.1	
7/18/2019	GCG	Conf w/ MJ and emails to TC and texts to JY re inspections.	0.3	
7/18/2019	GCG	Research and revise memory care dispute letter.	0.5	
7/18/2019	GCG	Email to WB re same.	0.1	
7/18/2019	GCG	Prepare for discovery hearing.	0.1	
7/18/2019	GCG	Review memorandum re Brookdale facilities in CA.	0.1	
7/18/2019	GCG	Revise email to JB re resident room inspections.	0.1	
7/18/2019	BBK	Reviewing joint discovery letter brief re inspections of memory care units w/ Defendants' section added and GCG's redlines thereto.	0.1	
7/18/2019	JSY	(Reduced Charge) Travel to and from Scotts Valley for site inspection.	2.0	2.0
7/18/2019	JSY	Site inspection of Scotts Valley.	6.5	
7/18/2019	KES	Calendar class cert deadlines.	0.2	
7/18/2019	KES	Review and circulate clerk's notices.	0.2	
7/18/2019	KES	Gather exhibit for discovery brief.	0.2	
7/19/2019	GCG	Conf w/ JY re opposition brief research and filing.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 215

SERVICES

Date	Person	Description of Services	Hours	Discount
7/19/2019	GCG	Research and revise Memory Care joint letter brief.	1.1	
7/19/2019	GCG	Confs w/ and emails to JB, WB, MJ and team re multiple revisions to same.	1.1	
7/19/2019	GCG	Email to GW and team re hearing before magistrate Beeler.	0.1	
7/19/2019	GCG	Oversee e-filing of joint letter brief.	0.2	
7/19/2019	GCG	Revise email to defendants re resident room issue.	0.2	
7/19/2019	GCG	Conf w/ BBK, JY and KES re document review and class cert motion.	0.5	
7/19/2019	GCG	Email to JY and team re Scotts Valley and other inspections.	0.2	
7/19/2019	BBK	Reviewing GCG communications w/ opposing counsel re finalizing joint letter brief; internal communications re sand-bagging w/ new arguments at end of day.	0.1	
7/19/2019	BBK	RBGG team meeting w/ GCG/JY/KES.	0.4	
7/19/2019	JSY	Conf. w/ GCG re extension; emails with opposing counsel re same.	0.2	
7/19/2019	JSY	Research for letter brief re memory care; conf. w/ GCG re same.	0.6	
7/19/2019	JSY	Prep. for team meeting; team meeting.	0.5	
7/19/2019	JSY	Edit draft declarations; conf. w/ GCG re same; emails re same.	2.0	
7/19/2019	KES	Gather fact and legal research in connection with discovery letter brief, prepare exhibit, finalize and file discovery letter brief.	1.7	
7/19/2019	KES	Meet re case status, discovery.	0.4	
7/22/2019	BBK	Reviewing JY communications w/ opposing counsel re extension request for merits response brief.	0.1	
7/22/2019	JSY	Emails re DSS investigator.	0.1	
7/22/2019	JSY	Emails re motion for extension; draft same.	0.4	
7/22/2019	KES	File notice of appearance for JY and confer JY re same.	0.4	
7/22/2019	KES	Send chambers copy of discovery letter.	0.1	
7/23/2019	BBK	Reviewing M. Johnson's meet and confer email to opposing counsel re reaching agreement for site inspections of BD facilities.	0.1	
7/23/2019	BCH	Reviewing model class member declarations.	0.8	
7/23/2019	BCH	Preparing notes for drafting class member declaration.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/23/2019	JSY	Draft motion for extension and declaration; emails re same; finalize and file same.	1.3	
7/23/2019	KES	File motion for extension of time.	0.2	
7/23/2019	KES	Download and circulate brief.	0.1	
7/24/2019	GCG	Emails re class list stip.	0.1	
7/24/2019	BCH	Preparing notes for drafting class member declaration.	0.5	
7/25/2019	GCG	Emails to JSY and team re magistrate Beeler's discovery orders.	0.1	
7/25/2019	BBK	Reviewing Court's Order granting Plaintiffs' two motions to compel; reviewing communications w/ co-counsel re class cert declarations.	0.1	
7/25/2019	JSY	Conf. w/ KES re class member records.	0.1	
7/25/2019	JSY	Emails re class cert declarations.	0.1	
7/25/2019	JSY	Emails with team re discovery hearing and order.	0.2	
7/25/2019	KES	Download, circulate and review court order, pleadings, and audio file.	0.4	
7/26/2019	KES	Supervise organization of class member documents.	0.2	
7/28/2019	GCG	Email to GW re class cert motion.	0.1	
7/29/2019	GCG	Review and revise MJ letter to defendants re inspections.	0.2	
7/29/2019	GCG	Emails to GW and team re mediation date and class cert meeting.	0.3	
7/29/2019	GCG	Emails to KES and team re plaintiff and witness information and DSS reports for class cert declarations.	0.2	
7/29/2019	BBK	Conferring w/ GCG re meeting at Schneider Wallace on 8/1; reviewing communications w/ team re planning for class cert.	0.1	
7/29/2019	JSY	Emails re call to DSS investigator; LM for same.	0.2	
7/29/2019	KES	Follow up re hearing transcript.	0.1	
7/30/2019	GCG	Confs with and emails to JY regarding request for extension.	0.2	
7/30/2019	GCG	Revise letter to defendants regarding inspections and notice; email MJ and team regarding same.	0.2	
7/30/2019	GCG	Emails to MJ and team regarding other disc. issues.	0.1	
7/30/2019	BBK	Reviewing JY update re call w/ DSS Legal Department re sending PRA requests for investigations; reviewing co-counsel communications re inspection notice and stipulation.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/30/2019	JSY	Conf. and emails and calls re extension request; research re same.	0.5	
7/30/2019	JSY	Call with DSS investigator; emails re same.	0.2	
7/30/2019	JSY	Emails re class cert declarations.	0.1	
7/30/2019	KES	TC court re EOT.	0.1	
7/30/2019	KES	Review emails re fact gathering.	0.1	
7/31/2019	GCG	Revise supplemental declaration ISO extension.	0.2	
7/31/2019	GCG	Confs with JY and emails to GW and team regarding same.	0.2	
7/31/2019	GCG	Email to KES regarding potential plaintiff.	0.1	
7/31/2019	GCG	Prepare for meeting with GW; conf and emails with JY regarding same; emails to MJ and defendants regarding discovery issues.	0.3	
7/31/2019	BBK	Reviewing multiple emails by co-counsel to opposing counsel re discovery disputes; conferring w/ team re 8/1 meeting at Schneider Wallace offices & F/U with prospective class member's family member who contacted us.	0.2	
7/31/2019	JSY	Draft and file supplemental declaration ISO motion to extend time for brief; emails regarding same.	0.5	
7/31/2019	KES	Review and respond to email from relative of Brookdale resident.	0.2	
7/31/2019	KES	File supplemental declaration re EOT and confer JY re same.	0.4	
7/31/2019	KES	Review co-counsel emails re discovery and inspections.	0.2	
7/31/2019	KES	Gather all current judge's standing and scheduling orders; review pending tasks.	0.3	
8/1/2019	GCG	(Reduced Charge) Travel to conduct meeting with co-counsel to plan site inspections and class cert motion.	0.5	0.5
8/1/2019	GCG	Emails regarding response brief.	0.1	
8/1/2019	GCG	Conduct meeting with co-counsel to plan site inspections and class cert motion.	2.8	
8/1/2019	BBK	Reviewing agenda for co-counsel meeting.	0.1	
8/1/2019	BBK	(Reduced Charge) Travel to Schneider Wallace for co-counsel meeting.	0.3	0.4
8/1/2019	BBK	Co-counsel meeting at Schneider Wallace.	2.0	
8/1/2019	BBK	(Reduced Charge) Travel back from meeting at Schneider Wallace.	0.2	0.3

SERVICES

Date	Person	Description of Services	Hours	Discount
8/1/2019	JSY	Prep. for team meeting.	0.1	
8/1/2019	JSY	(Reduced Charge) Travel to and from co-counsel office for team meeting.	0.5	0.5
8/1/2019	JSY	Team meeting.	2.0	
8/1/2019	KES	Follow up regarding EOT.	0.2	
8/1/2019	KES	Review agenda for co-counsel meeting and related task list.	0.2	
8/2/2019	GCG	Emails to co-counsel regarding discovery issues, inspections.	0.2	
8/2/2019	KES	Brief review of scanned documents regarding Brookdale resident.	0.1	
8/5/2019	BBK	Reviewing co-counsel communications regarding upcoming inspections.	0.1	
8/6/2019	GCG	Conf with BH regarding Algarme decl ISO class cert.	0.1	
8/6/2019	GCG	Review and revise multiple meet and confer communications to defendants regarding RFPs and inspections.	0.8	
8/6/2019	GCG	Conf with and email to MJ regarding inspection of Fountaingrove; email SG regarding same.	0.2	
8/6/2019	GCG	Conf with BBK regarding document review and motion to compel regarding complaints.	0.2	
8/6/2019	BBK	Conferring with GCG regarding motion to compel plan for resident complaints and identifying memory care named plaintiffs.	0.1	
8/6/2019	BBK	Reviewing M. Johnson meet and confer emails to opposing counsel regarding class member contact info and inspections of facilities.	0.1	
8/6/2019	KES	Telephone conference with relative of Brookdale San Jose resident and email summary of issues to team.	0.7	
8/7/2019	GCG	Conf w/ SG and MJ re Fountaingrove inspection.	0.1	
8/7/2019	GCG	Emails to GW and MJ re discovery issues.	0.1	
8/7/2019	GCG	Email from MJ re defendants' position on class member name.	0.1	
8/7/2019	GCG	Research re Brookdale turnaround.	0.1	
8/7/2019	FFV	Download, pdf, save to the DMS and email to the team article re Brookdale CEO turnaround.	0.4	
8/8/2019	GCG	Review court order re respondents' brief; email w/ team re same.	0.1	
8/8/2019	GCG	Emails to GW, MJ and team re expert inspections, reports and discovery delays.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/8/2019	BBK	Reviewing Order granting requested extension to file opposition brief and updating JY.	0.1	
8/8/2019	KES	Download and circulate order and calendar new deadline.	0.2	
8/8/2019	KES	Update electronic research files.	0.1	
8/9/2019	GCG	Conf w/ MJ re inspections and class member name email.	0.2	
8/9/2019	GCG	Attend to expert witness retention and report.	0.1	
8/9/2019	GCG	Review and revise discovery communications to defendants.	0.1	
8/9/2019	BBK	Reviewing RFPs 2-9 and Brookdale's objections thereto to assess status of discovery dispute and plan meet and confer approach to bring to impasse.	0.6	
8/9/2019	FFV	(Billing Judgment) Prepare fedex label, save to the DMS and send out GW check re reimbursement.	0.0	0.3
8/9/2019	BCH	Research for class member declarations for class cert. motion.	1.1	
8/13/2019	KES	Review and response to email from Brookdale resident relative re status of case.	0.2	
8/20/2019	GCG	Conf w/ BBK re RFP and motion to compel re complaints.	0.2	
8/20/2019	GCG	Conf w/ and emails to MJ and BBK re letter to defendants re various RFPs and need for meet and confer.	0.3	
8/20/2019	GCG	Review emails to WB and MJ re delayed document production.	0.2	
8/20/2019	GCG	Conf w/ JY re legal research for brief.	0.2	
8/20/2019	BBK	Reviewing materials in preparation for taking discovery dispute over resident complaints to impasse.	0.3	
8/20/2019	BBK	Meeting w/ GCG re discovery dispute and meet and confer process.	0.2	
8/20/2019	BBK	Conferring by phone w/ GCG and M. Johnson re discovery disputes and meet and confer process.	0.3	
8/20/2019	JSY	Conf. w/ GCG and BH re class certification declarations.	0.1	
8/20/2019	KES	Review and respond to inquiry re out of state Brookdale facility.	0.2	
8/21/2019	GCG	Emails to MJ and JK re meet and confer.	0.1	
8/21/2019	GCG	Email to KES and team re document review and potential witnesses.	0.1	
8/21/2019	GCG	Prepare for mediation.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/21/2019	BBK	Reviewing communications re M. Johnson's draft redlines to stipulation re production of BD resident contact information; letters from mediator re mediation; and notice of new doc production by Ds.	0.1	
8/21/2019	KES	Review mediation information and calendar deadlines.	0.3	
8/21/2019	BCH	Research and draft Algarme declaration.	3.0	
8/22/2019	GCG	Legal research; conf w/ BH re same.	0.1	
8/22/2019	GCG	Participate in meet and confer re inspections w/ JK, Ruben, MJ and TC.	1.0	
8/22/2019	GCG	Follow up call and emails w/ MJ and TC and email to GW re same.	0.1	
8/22/2019	GCG	Email to GW re mediation planning.	0.1	
8/22/2019	BBK	Reviewing Defendants' document productions to confirm no resident complaints have been produced thus far.	0.8	
8/22/2019	BBK	Reviewing/analyzing Defendants' produced policies on grievances/resident complaints and FHA compliance.	0.3	
8/22/2019	BCH	Drafting Algarme declaration.	0.5	
8/22/2019	BCH	Drafting putative class member declaration.	1.1	
8/23/2019	GCG	Conf w/ BBK, JY and KES re document review and motions to compel.	0.4	
8/23/2019	GCG	Conf w/ GW and MJ re mediation strategy.	0.3	
8/23/2019	GCG	Review and revise draft stipulation re inspections.	0.2	
8/23/2019	GCG	Review email to JB and MJ re class list issues.	0.1	
8/23/2019	GCG	Conf w/ JY and BH re draft brief.	0.1	
8/23/2019	BBK	Conducting factual online research re potential whistleblower who contacted our office.	0.2	
8/23/2019	BBK	Calling & leaving message for potential whistleblower who contacted our office.	0.1	
8/23/2019	BBK	Conferring w/ LM and KES re call w/ potential whistleblower who contacted our office; updating GCG and JY.	0.2	
8/23/2019	BBK	RBGG team meeting w/ GCG, JY, and KES.	0.4	
8/23/2019	BBK	Reviewing GCG update re call with Guy Wallace & JY update re contact w/ named plaintiff.	0.1	
8/23/2019	BBK	Reviewing communications re revised stipulation re inspections of facilities.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/23/2019	BBK	Reviewing communications w/ co-counsel re contact from named plaintiff re inspection.	0.1	
8/23/2019	JSY	Conf. w/ BH re Answering Brief.	0.2	
8/23/2019	JSY	Team meeting.	0.3	
8/23/2019	JSY	Emails re message from J. Algarme re fall.	0.1	
8/23/2019	KES	Team meeting re case status, tasks.	0.4	
8/23/2019	KES	TC with intake re Brookdale inquiry.	0.1	
8/23/2019	BCH	Confer with JY re appeal briefing project.	0.1	
8/23/2019	BCH	Review materials for appeal briefing.	1.0	
8/23/2019	BCH	Drafting and revising Algarme declaration.	3.4	
8/23/2019	BCH	Drafting appeal brief section.	2.4	
8/26/2019	GCG	Emails to JM and defendants re discovery call.	0.1	
8/26/2019	BCH	Drafting appeal brief section.	5.8	
8/27/2019	GCG	Participate in meet and confer w/ defendants' counsel and MJ re class member contact information and inspections.	0.6	
8/27/2019	GCG	Emails to MJ re same.	0.1	
8/27/2019	GCG	Draft letter to named class reps re mediation.	0.1	
8/27/2019	GCG	Email to JY and BH e case to include in brief.	0.1	
8/27/2019	JSY	Emails re brief; review section of brief drafted by BH.	0.2	
8/27/2019	BCH	Drafting appeal brief section.	6.7	
8/28/2019	GCG	Review defendants' proposed class contact stipulation; email to GW and MJ re same.	0.1	
8/28/2019	BBK	Reviewing Community Care Licensing response to subpoenas, M. Johnson response thereto, and co-counsel internal communications re meeting and conferring.	0.1	
8/28/2019	BBK	Reviewing M. Johnson-opposing counsel communication re obtaining agreement on class member contacts and internal co-counsel communications re finalizing stipulation so production will begin.	0.1	
8/28/2019	JSY	Conf. w/ BH re arbitration appeal answering brief.	0.2	
8/28/2019	BCH	Drafting appeal brief section.	6.7	
8/29/2019	GCG	Emails to MJ, defendants and defendants and MJ re inspections and class list.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/29/2019	BBK	Reviewing M. Johnson F/U w/ opposing counsel re agreement on stipulation on class contacts and outstanding response from Ds on Plaintiffs' proposed stipulation on site inspections and whether next weeks site inspections will go forward.	0.1	
8/29/2019	BBK	Reviewing T. Close's report re expert inspection of BD Corona.	0.1	
8/29/2019	BCH	Drafting appeal brief section.	3.2	
8/30/2019	GCG	Meet w/ BBK, JSY and KES re discovery document review, class certification and motions to compel.	0.5	
8/30/2019	GCG	Conf w/ and emails to MJ and TC re ongoing inspections and defendants' revisions to inspection stipulation.	0.4	
8/30/2019	GCG	Email to KES re San Jose facility.	0.1	
8/30/2019	BBK	Reviewing Defendants' objections to site inspections and emails between M. Johnson & opposing counsel re addressing/resolving dispute or going to court (including internal communications w/ co-counsel re this).	0.2	
8/30/2019	BBK	Weekly RBGG team meeting w/ GCG/JY/KES.	0.2	
8/30/2019	JSY	Team meeting.	0.3	
8/30/2019	KES	Review document production and review status in Relativity.	0.2	
8/30/2019	KES	Meet regarding case status, declaration gathering.	0.3	
8/30/2019	KES	Update master tracking chart.	0.1	
8/31/2019	GCG	Review and analyze court of appeal decision re arbitration clause.	0.2	
9/2/2019	GCG	Review emails from potential plaintiffs.	0.1	
9/2/2019	GCG	Legal research for brief.	0.1	
9/3/2019	GCG	Emails to MJ and team re inspection delays, proposed stipulations and related issues.	0.4	
9/3/2019	BBK	Reviewing JY's updated case to do list distributed to RBGG team.	0.1	
9/3/2019	BBK	Reviewing M. Johnson-opposing counsel communications re site inspections & discovery disputes (including internal communications w/ Plaintiffs' team).	0.1	
9/3/2019	JSY	Update case to do list; emails re same.	0.2	
9/3/2019	KES	Gather information re two Brookdale facilities in connection with declaration gathering.	0.6	
9/4/2019	GCG	Conf w/ MJ re overall discovery strategy.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/4/2019	GCG	Emails to MJ and JK re inspection delays and disputes.	0.2	
9/4/2019	GCG	Conf w/ JSY re alternative argument to raise in brief.	0.1	
9/4/2019	BBK	Reviewing M. Johnson-opposing counsel emails re disputes over scheduling of site inspections.	0.1	
9/4/2019	JSY	Draft and edit Answering brief; research re same.	5.0	
9/5/2019	GCG	Review meet and confer communications between JK, WB and MJ.	0.1	
9/5/2019	GCG	Conf w/ KES re memory care plaintiff.	0.1	
9/5/2019	GCG	Email to MJ and team re discovery issues and next steps.	0.1	
9/5/2019	BBK	Reviewing M. Johnson-opposing counsel communications re discovery disputes over inspections and stipulation re class member contact info; internal communications w/ co-counsel re our position at final meet and confer prior to letter brief.	0.2	
9/5/2019	JSY	Draft Answering Brief; edit same.	3.0	
9/5/2019	KES	Telephone conference with relative of Brookdale resident, follow up emails and memo to team re same.	1.2	
9/6/2019	GCG	Review emails from MJ and JK re potential resolution to inspection dispute.	0.1	
9/6/2019	BBK	Reviewing KES memo re call w/ family member of potential memory care named plaintiff.	0.1	
9/6/2019	BBK	Conferring w/ KES re F/U w/ family member of potential memory care named plaintiff.	0.1	
9/6/2019	BBK	Reviewing co-counsel communications re meeting and conferring w/ DSS re subpoenas for public files for BD Facilities for CCL offices.	0.1	
9/8/2019	GCG	Review and comment on discovery meet and confer draft letter re various unresolved disputes; email MJ re same.	0.1	
9/9/2019	GCG	Review and revise proposed inspection stipulation.	0.1	
9/9/2019	GCG	Emails to MJ and GW re same.	0.2	
9/9/2019	GCG	Review MJ emails to defendants re stipulation and confirming inspections.	0.1	
9/9/2019	BBK	Reviewing M. Johnson drafting M&C letter re impasse on various RFPs w/ T. Close and GCG comments thereon.	0.2	
9/9/2019	JSY	Draft Answering Brief.	0.5	
9/9/2019	JSY	T/C with MTJ re arbitration agreements.	0.2	
9/9/2019	KES	Review letter re discovery.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/10/2019	GCG	Conf w/ JSY re appellate brief drafting.	0.1	
9/10/2019	GCG	Revise letter to clients re mediation, emails to GW re same.	0.2	
9/10/2019	GCG	Review and comment on arbitration discovery requests.	0.1	
9/10/2019	GCG	Revise case to do list.	0.1	
9/10/2019	GCG	Conf w/ BBK re meet and confer letter.	0.1	
9/10/2019	GCG	Review emails to MJ and defendants re inspections and class member contacts.	0.2	
9/10/2019	JSY	Draft and edit Answering Brief.	5.2	
9/11/2019	GCG	Conf w/ and email to JSY re appellate brief.	0.1	
9/11/2019	GCG	Review and comment on final draft of class member contact stipulation and proposed order.	0.1	
9/11/2019	GCG	Emails to MJ and defendants re same and re inspection stipulation and inspection schedule.	0.1	
9/11/2019	GCG	Emails to JY re JA class cert declaration.	0.1	
9/11/2019	GCG	Revise letter to class representatives re mediation.	0.1	
9/11/2019	BBK	Communications w/ co-counsel re approving/filing stipulation on access to resident contact info.	0.1	
9/11/2019	BBK	Reviewing JY's revised draft class declaration by Algarme.	0.1	
9/11/2019	JSY	Draft and edit Answering Brief; emails with GCG re same.	4.7	
9/11/2019	JSY	T/C with J. Algarme; emails re same; edit declaration re same.	0.8	
9/11/2019	KES	Download and circulate pleading.	0.1	
9/11/2019	KES	Review emails re communication with client.	0.1	
9/12/2019	GCG	Conf w/ MJ re revisions to second special rogs and other discovery issues.	0.2	
9/12/2019	GCG	Emails to BBK, JSY and KES re meet and confer letters and restrictions imposed by new order allowing class contact information.	0.2	
9/12/2019	GCG	Confs w/ JSY re letters to class representatives re upcoming mediation.	0.2	
9/12/2019	GCG	Conf w/ JSY re revisions to appellate brief.	0.1	
9/12/2019	BBK	Planning/drafting meet and confer letter re RFPs 2-9 on resident complaints.	3.3	
9/12/2019	BBK	Conferring w/ GCG re meet and confer letters.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/12/2019	JSY	Conf. w/ GCG re JA declaration.	0.1	
9/12/2019	JSY	Edit letter to named plaintiffs.	0.3	
9/12/2019	JSY	Research for Answering Brief; edit same.	1.4	
9/12/2019	KES	Emails letters re mediation to individual clients.	0.5	
9/13/2019	GCG	Review and revise 2d set of special rogs.	0.1	
9/13/2019	GCG	Emails to MJ re same and re meet and confer w/ defendants re 1st RFPs.	0.1	
9/13/2019	GCG	Emails to BBK and team re discovery issues.	0.1	
9/13/2019	GCG	Email named plaintiff, BJH and team re medication questions.	0.1	
9/13/2019	KES	Review emails re discovery and calendar deadlines.	0.2	
9/13/2019	KES	Download and circulate pleading.	0.1	
9/13/2019	KES	Review and respond to client emails.	0.2	
9/15/2019	GCG	Review and analyze draft respondents' brief.	0.2	
9/16/2019	GCG	Review and revise BBK meet and confer letter re complaints.	0.2	
9/16/2019	GCG	Emails to MJ, GW and BBK re same.	0.2	
9/16/2019	GCG	Emails to MJ, JK and experts re upcoming inspections.	0.1	
9/16/2019	GCG	Conf w/ JSY and emails to JSY and team re status of appellate brief.	0.1	
9/16/2019	BBK	Conferring w/ GCG & co-counsel re revising/sending M&C letter on RFPs seeking resident complaints.	0.4	
9/16/2019	BBK	Reviewing/incorporating GCG, M. Johnson, and G. Wallace comments and proposed revisions to M&C letter on RFPs seeking residency complaints and revising/finalizing/sending letter to opposing counsel.	0.8	
9/16/2019	BBK	Finalizing M&C letter.	0.1	
9/16/2019	JSY	Emails with JA re mediation.	0.1	
9/17/2019	GCG	Prepare for meet and confer call w/ opposing counsel.	0.1	
9/17/2019	GCG	Review emails re DSS subpoena.	0.1	
9/17/2019	GCG	Review and revise respondents' brief.	0.9	
9/17/2019	KES	Follow up with relative of Brookdale resident re residency agreement.	0.2	
9/18/2019	GCG	Meet and confer call w/ defendants and co-counsel re issues raised in MJ September 9 letter.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/18/2019	GCG	Draft memo to file re same.	0.1	
9/18/2019	GCG	Review TC draft letter memorializing same.	0.1	
9/18/2019	GCG	Conf w/ and email to KES re potential class rep residency agreement.	0.1	
9/18/2019	GCG	Email w/ potential witness.	0.1	
9/18/2019	GCG	Conf w/ and email to JSY re revisions to brief.	0.8	
9/18/2019	BBK	Reviewing communications between KES and GCG re communications w/ potential declarants and named Plaintiffs.	0.1	
9/18/2019	JSY	Review edits to brief; conf. w/ GCG re same; edit brief.	1.5	
9/18/2019	KES	Telephone call and emails with relative of Brookdale resident; emails to team re same; review documents re same.	1.7	
9/19/2019	GCG	Email to GW and team re report of Brookdale Board issues.	0.1	
9/19/2019	GCG	Emails to KES re potential class rep residency agreement.	0.1	
9/19/2019	GCG	Email to MJ and Brookdale facility re subpoena.	0.1	
9/19/2019	GCG	Review and revise draft brief; conf w/ and emails to JSY re same.	0.2	
9/19/2019	BBK	Reviewing further GCG-KES queries re documents received from potential declarant.	0.1	
9/19/2019	JSY	Edit brief.	3.1	
9/19/2019	FFV	Download, pdf, save to the DMS and email article re case.	0.3	
9/19/2019	KES	Emails with relative of Brookdale San Dimas resident and review documents re same.	0.8	
9/20/2019	BBK	Reviewing JY's draft Answering Brief.	0.5	
9/20/2019	JSY	Edit brief; email draft to co-counsel.	0.3	
9/20/2019	KES	Follow up re communications from relative of Brookdale resident.	0.1	
9/23/2019	GCG	Emails to JY re request for judicial notice and excerpts of record.	0.2	
9/23/2019	GCG	Emails to MJ and defendants re overdue discovery production.	0.1	
9/23/2019	BBK	Reviewing M. Johnson report re proposed plan for outreach to people on class list.	0.1	
9/23/2019	BBK	Communications w/ RBGG team re FU with prospective class member at Brookdale San Dimas.	0.1	
9/23/2019	JSY	Draft RJN; research same.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/23/2019	JSY	Emails and conf. w/ KS re potential new class rep.	0.2	
9/23/2019	KES	Review additional documents provided by relative of Brookdale San Dimas resident, email re same and update memo to team re same.	0.5	
9/24/2019	GCG	Review and revise draft letter to class contact list.	0.3	
9/24/2019	GCG	Email to MJ and team re same and re plan for contacting putative class members.	0.2	
9/24/2019	GCG	Email to MJ, BBK and WB re meet and confer re complaints and document production.	0.2	
9/24/2019	GCG	Conf w/ BBK re same.	0.1	
9/24/2019	GCG	Confs w/ JSY re putative class member call.	0.2	
9/24/2019	GCG	Conf w/ JSY and emails to GW and MJ re revisions to draft brief.	0.2	
9/24/2019	BBK	Planning/drafting/sharing w/ team FU to Defendants re failure to offer dates/times for meet and confer in response to 9/16 M&C letter re complaints.	0.5	
9/24/2019	BBK	Conferring w/ GCG, M. Johnson, and G. Wallace re sending FU.	0.1	
9/24/2019	BBK	Reviewing W. Buffaloe response to BBK FU email re M&C letter and conferring w/ co-counsel re whether to schedule call or draft FU email.	0.2	
9/24/2019	BBK	Drafting/revising email response to W. Buffaloe requesting information in writing by 9/26 in lieu of meet and confer call after-hours that would not include lead counsel.	0.6	
9/24/2019	BBK	Conferring w/ co-counsel and RBGG team re scheduling meeting for 10/3 and planning outreach to class list.	0.2	
9/24/2019	BBK	Reviewing communications w/ co-counsel re revising/finalizing Opposition brief.	0.1	
9/24/2019	JSY	Emails and conf. re new possible named plaintiffs.	0.2	
9/24/2019	JSY	Emails re outreach plan.	0.1	
9/24/2019	JSY	Edits to Answering Brief; conf. w/ GCG re same.	0.9	
9/24/2019	KES	Update electronic documents files.	0.2	
9/24/2019	KES	Review emails and documents re class contact list.	0.2	
9/25/2019	KES	Follow up re Brookdale potential declarant contacts.	0.1	
9/26/2019	GCG	Conf w/ JY and email to AX re finalizing brief.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/26/2019	GCG	Review BB emails re amending responses and document production.	0.2	
9/26/2019	GCG	Conf w/ MJ re communication to class list and meeting to discuss same.	0.2	
9/26/2019	BBK	Reviewing opposing counsel response to query re planned production of resident complaints and timing of amended responses to RFPs.	0.1	
9/26/2019	BBK	Conferring w/ RBGG team re AX joining case.	0.1	
9/26/2019	JSY	Send materials to AX re case.	0.1	
9/26/2019	JSY	Conf. w/ GCG re filing brief; emails re same.	0.2	
9/26/2019	FFV	(Billing Judgment) Download, pdf and save to the DMS article re assisted living.	0.0	0.3
9/26/2019	KES	Review status of Brookdale issues.	0.1	
9/27/2019	GCG	Conf w/ BBK and KES re class member list and outreach and ongoing discovery meet and confer issues.	0.3	
9/27/2019	GCG	Email to CW re website estimate for class member letter.	0.2	
9/27/2019	GCG	Conf w/ JSY re revising appellate brief.	0.1	
9/27/2019	BBK	Weekly RBGG team meeting on case strategy and tasks.	0.3	
9/27/2019	JSY	Edit brief and RJN.	0.3	
9/27/2019	KES	Meet with team to discuss next steps, class member outreach.	0.3	
9/28/2019	GCG	Review and analyze defendants' opening brief.	0.5	
9/28/2019	GCG	Review Excepts of Record.	0.5	
9/28/2019	GCG	Revise plaintiffs' responding brief.	0.2	
9/29/2019	GCG	Continued review and analysis of excerpts of record.	1.0	
9/29/2019	GCG	Revise Carlson section of respondents' brief.	1.2	
9/30/2019	GCG	Emails to GW and JSY re mediation brief.	0.1	
9/30/2019	GCG	Conf w/ CW and email to MJ and team re website for class members.	0.2	
9/30/2019	GCG	Conf w/ and email to JSY re further revisions to brief.	0.2	
9/30/2019	GCG	Review and revise same.	0.3	
9/30/2019	AX	Read and cite check answering brief on appeal.	0.8	
9/30/2019	AX	Review district court decisions.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/30/2019	JSY	Emails re mediation brief.	0.1	
9/30/2019	JSY	Edit answering brief; conf. w/ GCG re same; conf. w/ AX re cite check of same.	1.8	
10/1/2019	GCG	Prepare for mediation.	0.2	
10/1/2019	GCG	Email MJ and team re class list meeting.	0.2	
10/1/2019	GCG	Conf w/ JSY re website for class members.	0.2	
10/1/2019	GCG	Revise website for class members.	0.2	
10/1/2019	GCG	Review and revise draft appellate brief.	1.0	
10/1/2019	GCG	Conf w/ JSY and AX re same and re cite and fact check of brief.	0.2	
10/1/2019	AX	Meeting with Brookdale team to discuss brief review schedule (.3); cite check brief and read associated cases (3.2).	3.5	
10/1/2019	JSY	Edit Answering Brief; research re same; conf. multiple times with GCG and AX re same; emails with co-counsel re same.	3.6	
10/1/2019	KES	Review 9th circuit rules re briefs.	0.2	
10/2/2019	GCG	Research re Brookdale's Board and acquisitions.	0.1	
10/2/2019	GCG	Revise website information for putative class members.	0.2	
10/2/2019	GCG	Review and revise draft mediation brief.	0.5	
10/2/2019	GCG	Revise draft appellate brief.	0.1	
10/2/2019	GCG	Conf w/ and emails to JSY and email to MJ re final revisions and cite check.	0.1	
10/2/2019	GCG	Conf w/ KES re filing issues.	0.1	
10/2/2019	AX	Cite-check answering brief, including reading cases; discuss proposed changes with JY.	2.2	
10/2/2019	JSY	Edit Answering Brief; multiple conf. and emails re same.	3.0	
10/2/2019	KES	Send mediation payment to JAMS.	0.2	
10/2/2019	KES	Update fact research files.	0.1	
10/3/2019	GCG	Conf w/ JSY re final edit to and filing responsive brief and RJN.	0.2	
10/3/2019	GCG	Review and revise draft mediation brief.	1.0	
10/3/2019	GCG	Emails to GW and team re same.	0.2	
10/3/2019	BBK	(Billing Judgment) Reviewing enotices of filing of answering brief and RJN in 9th Cir.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 230

SERVICES

Date	Person	Description of Services	Hours	Discount
10/3/2019	BBK	Reviewing GCG and G. Wallace comments re mediation brief.	0.1	
10/3/2019	BBK	Reviewing plaintiffs' mediation brief.	0.5	
10/3/2019	JSY	Review mediation brief; emails re same.	0.2	
10/3/2019	JSY	Edit and finalize brief for filing.	2.0	
10/3/2019	KES	File Answering Brief and RJN and circulate to team; review 9th Circuit rules re same; arrange for preparation of hard copy briefs for court.	1.5	
10/4/2019	GCG	Prepare for mediation.	0.1	
10/4/2019	GCG	Emails to GW re same.	0.1	
10/4/2019	GCG	Oversee submission of paper copies.	0.1	
10/4/2019	BBK	Reviewing letter from Defendants re supplemental doc production; reviewing AX updated case task list.	0.1	
10/4/2019	JSY	Emails with AX re to do list.	0.1	
10/4/2019	KES	Organize mediation documents.	0.2	
10/4/2019	KES	Review hard copies of brief and arrange for delivery to court.	0.4	
10/5/2019	GCG	Review as filed version of appellate response brief.	0.1	
10/6/2019	GCG	Email to potential witness/family member re Brookdale San Louis Obispo.	0.1	
10/6/2019	GCG	Email to JSY re class member outreach.	0.1	
10/6/2019	GCG	Email to MJ re letter from defendants re rolling production and lack of document production.	0.1	
10/7/2019	GCG	Review documents for mediation.	0.2	
10/7/2019	GCG	Conferences with GW, JSY and email KS re preparation for mediation.	0.2	
10/7/2019	GCG	Review objections to subpoena from Fountaingrove attorneys.	0.2	
10/7/2019	GCG	Email KES re class member death.	0.1	
10/7/2019	GCG	Conference with JSY re expert and Plaintiff research.	0.2	
10/7/2019	GCG	Email MJ and team re Defendants' document production.	0.1	
10/7/2019	BBK	Reviewing Schneider Wallace reports on contents of BD's latest production.	0.1	
10/7/2019	BBK	Reviewing BD's amended responses to RFP Set 1.	0.1	
10/7/2019	BBK	Reviewing JY's draft website language for class member outreach.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 231

SERVICES

Date	Person	Description of Services	Hours	Discount
10/7/2019	JSY	Edit website language for class member outreaching; emails re same.	0.3	
10/7/2019	JSY	Conf. multiple times w/ AX and GCG re mediation prep and current projects.	0.3	
10/7/2019	KES	Follow up with relative of Brookdale resident.	0.2	
10/8/2019	GCG	Participate in first day of mediation at JAMS with co-counsel and Judge Infante.	7.9	
10/8/2019	GCG	(Reduced Charge) Travel back to office.	0.1	0.1
10/8/2019	BBK	Reviewing updates from mediation.	0.1	
10/8/2019	JSY	Emails re mediation.	0.2	
10/8/2019	KES	Review emails re class member issues.	0.2	
10/9/2019	GCG	Follow-up from mediation.	0.1	
10/9/2019	GCG	Emails with GW, MJ re meeting to discuss class outreach and discovery disputes/delays.	0.2	
10/9/2019	AX	Correspond with cocounsel regarding Relativity.	0.2	
10/10/2019	GCG	(Reduced Charge) Travel to team meeting at Schneider Wallace.	0.5	0.5
10/10/2019	GCG	Attend to follow up tasks, including revisions to class member outreach letter and website statement.	0.7	
10/10/2019	GCG	Prepare for and participate in team meeting at Schneider Wallace.	2.5	
10/10/2019	BBK	Reviewing M. Johnson agenda for co-counsel case strategy meeting.	0.1	
10/10/2019	BBK	(Reduced Charge) Travel to Schneider Wallace offices for co-counsel case strategy meeting.	0.3	0.3
10/10/2019	BBK	Co-counsel case strategy meeting at Schneider Wallace.	2.2	
10/10/2019	BBK	(Reduced Charge) Travel back from to Schneider Wallace offices after co-counsel case strategy meeting.	0.4	0.4
10/10/2019	AX	(Reduced Charge) Travel to cocounsel meeting.	0.6	0.7
10/10/2019	AX	Meeting with cocounsel to discuss class member outreach.	2.5	
10/10/2019	AX	Discuss to-do list with GCG.	0.2	
10/10/2019	AX	Review meeting minutes and update to-do list.	0.5	
10/10/2019	JSY	Team meeting.	2.5	
10/10/2019	JSY	(Reduced Charge) Travel to and from team meeting.	0.5	0.5

SERVICES

Date	Person	Description of Services	Hours	Discount
10/10/2019	KES	Gather materials for meeting with co-counsel.	0.2	
10/10/2019	KES	(Reduced Charge) Travel to/from co-counsel office for case strategy meeting.	0.5	0.5
10/10/2019	KES	Participate in meeting with co-counsel re case strategy, next steps.	2.5	
10/10/2019	KES	Review research memos and documents re materials obtained from physical DSS file review.	0.7	
10/11/2019	GCG	Review and revise acknowledgment of protective order and class outreach orders.	0.5	
10/11/2019	GCG	Conf w/ AX re same.	0.1	
10/11/2019	GCG	Emails to MJ and team re document review, discovery disputes and class outreach.	0.5	
10/11/2019	GCG	Review and revise MJ revisions to class outreach letter.	0.1	
10/11/2019	GCG	Revise and circulate memo to file re meet and confer call.	0.2	
10/11/2019	GCG	Run conflicts check re carriers and coverage counsel.	0.2	
10/11/2019	BBK	Communications w/ co-counsel re revisions to class outreach letters and website text (including reviewing revisions thereto).	0.2	
10/11/2019	BBK	Reviewing Brookdale letter re next tranche of rolling document production; reviewing M. Johnson communications w/ former BD Fountaingrove current owner re: meeting and conferring re subpoena for site inspection & M. Johnson follow-up w/ BD re inadequate responses to ROGs.	0.2	
10/11/2019	BBK	Reviewing M. Johnson's post-team meeting updated case tasklist and AX's RBGG team case tasklist.	0.2	
10/11/2019	BBK	Conferring w/ JY/AX re research projects on speaking w/ former BD employees and AC privilege for communications w/ putative class members prior to certification of class.	0.1	
10/11/2019	BBK	(Billing Judgment) communications re adding EH to case team.	0.0	0.1
10/11/2019	AX	Review stipulation and proposed order and protective order.	1.0	
10/11/2019	AX	Review documents in DMS.	0.8	
10/11/2019	AX	Draft acknowledgment.	0.5	
10/11/2019	AX	Read class declarations.	0.8	
10/11/2019	AX	review draft script from Levi's Stadium settlement.	0.5	
10/11/2019	AX	Email correspondence re: case.	1.1	
10/11/2019	AX	review prior research memos.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/11/2019	AX	Send out to-do list.	0.2	
10/11/2019	AX	Draft class member outreach script.	1.2	
10/11/2019	JSY	Research re communications with prior employees; research re communications with class members.	1.0	
10/11/2019	JSY	Emails re same and re case tasks; conf. w/ AX re same.	0.5	
10/11/2019	KES	Online research re Brookdale financial filings.	1.0	
10/11/2019	KES	Review emails re document production, follow up tasks; review tasks lists re same.	0.5	
10/14/2019	GCG	Confs w/ AX and KES re preparation for class list calls and script to use.	0.2	
10/14/2019	GCG	Revise script for calls w/ putative class members.	0.2	
10/14/2019	JSY	Emails re script for putative class member calls.	0.1	
10/14/2019	BBK	Reviewing GCG memo re 9/18 telephonic meet and confer.	0.1	
10/14/2019	BBK	Reviewing A, Avilucea update re batches assignments for document coding & AX update re acknowledgment of protective orders.	0.1	
10/14/2019	BBK	Conferring w/ AX and JY re preparing script for class member outreach.	0.1	
10/14/2019	AX	Email BBK/JY re: draft questions.	0.2	
10/14/2019	AX	Review case file for outreach script.	1.8	
10/14/2019	AX	Draft questions and edit.	2.5	
10/14/2019	AX	Review prior research.	0.7	
10/14/2019	AX	Meeting re: Relativity interface and document review.	0.5	
10/14/2019	KES	Gather materials for draft class outreach script.	0.3	
10/14/2019	KES	Review emails re document review assignments.	0.1	
10/15/2019	GCG	Continued revisions of script for calls w/ putative class.	0.3	
10/15/2019	GCG	Emails to JY, AX and team re same and re class definition.	0.3	
10/15/2019	BBK	Reviewing BD responses to Plaintiffs 3d Set of RFPs and 2nd Set of ROGs.	0.2	
10/15/2019	BBK	Reviewing/revising AX's draft class member outreach script.	1.3	
10/15/2019	BBK	Conferring w/ AX/JY/GCG/KES re finalizing class member outreach script.	0.1	
10/15/2019	AX	Review and draft email correspondence.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/15/2019	AX	Revise outreach information.	1.5	
10/15/2019	AX	Work in Relativity.	0.5	
10/15/2019	AX	Work on draft Acknowledgment for Sharepoint users.	0.5	
10/15/2019	AX	Draft FAQs.	1.8	
10/15/2019	AX	Research issues for memo.	1.5	
10/15/2019	JSY	Emails re class member script; review and edit same.	0.5	
10/15/2019	KES	Review draft class member script and email team re same.	0.2	
10/15/2019	KES	Review and sign PO acknowledgment.	0.1	
10/16/2019	GCG	Conf w/ and emails to AW re calls w/ putative class members and script for same.	0.2	
10/16/2019	BBK	Reviewing M. Johnson FU w/ Defendants requesting meet and confer dates on inadequate responses to 3rd Set of RFPs and 2d Set of ROGs.	0.1	
10/16/2019	BBK	Reviewing protective orders & acknowledgment/agreement to bound drafted by AX; conferring w/ team re this.	0.2	
10/16/2019	BBK	Reviewing JY and M. Johnson redlines to class member outreach script.	0.2	
10/16/2019	AX	Incorporate revisions and review outreach information.	2.0	
10/16/2019	AX	Draft, circulate, and revise FAQs for outreach.	2.5	
10/17/2019	GCG	Emails MJ re Fountaingrove inspection.	0.1	
10/17/2019	GCG	Conference with AX and email with MJ and team re website, phone number and class outreach.	0.1	
10/17/2019	GCG	Email AX, MJ re Defendants' meet & confer proposal.	0.1	
10/17/2019	GCG	Conference and email with AX re protective order acknowledgments and legal research.	0.1	
10/17/2019	BBK	Reviewing M. Johnson communications re status of class outreach; conferring w/ team re scheduling M&C with Defendants; signing acknowledgment to be bound by POs.	0.1	
10/17/2019	AX	Read/respond to emails re class member outreach.	0.3	
10/17/2019	JSY	Emails re M+C call.	0.1	
10/17/2019	KES	Review emails re outreach script.	0.1	
10/18/2019	AX	Research, write, and revise Brookdale memo regarding communication with putative class members and whether such communications are privileged (4.2).	4.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/18/2019	AX	Email communication.	0.5	
10/18/2019	JSY	Conf. w/ AX re research memos.	0.2	
10/18/2019	JSY	Emails re team communications.	0.1	
10/18/2019	KES	Follow up re order on stipulation.	0.1	
10/20/2019	GCG	Review and respond to MJ email re AG document production and DSS documents.	0.2	
10/20/2019	GCG	Review team emails re class member outreach and next steps.	0.2	
10/20/2019	AX	Research, write, and revise Brookdale memo re: communication with putative class members and whether such communications are privileged.	5.2	
10/21/2019	AX	Revise Brookdale memo re: communication with putative class members prior to certification; review memo re: communication with ex employees; review CA Rules of Professional Conduct.	4.2	
10/22/2019	GCG	Emails to BBK and team re meet and confer issues.	0.1	
10/22/2019	BBK	Reviewing co-counsel communications re CDSS inadequate response to SDTs.	0.1	
10/22/2019	BBK	Reviewing AX's updated RBGG case tasklist and revised FAQ for CM outreach script.	0.1	
10/22/2019	BBK	Conferring w/ team re preparations for 10/24 meet and confer.	0.1	
10/22/2019	AX	Review and revise memo to file re status.	0.6	
10/22/2019	JSY	Emails re discovery issues; conf. w/ KES re document review.	0.2	
10/22/2019	KES	Download and circulate order.	0.1	
10/23/2019	GCG	Emails to GW re inspections.	0.2	
10/23/2019	GCG	Conf w/ BBK and email to MJ re meet and confer call agenda.	0.1	
10/23/2019	GCG	Review and revise AX memo re class member contact and privilege.	0.2	
10/23/2019	GCG	Email to AX re revisions to same.	0.1	
10/23/2019	GCG	Review CDH memo re contacting former Brookdale employees; email to AX re same.	0.2	
10/23/2019	BBK	Conferring by phone w/ AX re research on class member outreach plan.	0.1	
10/23/2019	BBK	Reviewing AX legal memo on pre-certification contacts with putative class members.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/23/2019	BBK	Reviewing M. Johnson proposed agenda for 10/24 meet and confer & proposing additional item (including check of docs produced in Relativity).	0.3	
10/23/2019	KES	Review index of Brookdale most recent production.	0.3	
10/23/2019	KES	Update electronic files.	0.1	
10/24/2019	GCG	Conf w/ MJ re class member outreach and discovery issues.	0.1	
10/24/2019	GCG	Email to BBK and team re same.	0.1	
10/24/2019	GCG	Revise AX memo re privileges applicable to class member communications.	0.1	
10/24/2019	GCG	Email to AX re communications w/ former employees.	0.1	
10/24/2019	BBK	Reviewing AX's revisions to legal memo re pre-certification contacts with putative class members.	0.1	
10/24/2019	BBK	Preparations for meet and confer call (including communications w/ M. Johnson, reviewing discovery responses and document productions to determine status and necessary FU for each dispute).	1.9	
10/24/2019	BBK	Conducting telephonic meet and confer w/ M. Johnson and opposing counsel.	0.8	
10/24/2019	BBK	Drafting memo regarding meet and confer based on notes and distributing to team.	1.1	
10/24/2019	BBK	Reviewing GCG report re post-meet and confer call w/ M. Johnson and plan for analyzing doc prods.	0.1	
10/24/2019	BBK	Reviewing Brookdale's 9th Circuit Reply Brief filed today.	0.2	
10/24/2019	AX	Discuss memo re: communication with putative class members with GCG.	0.1	
10/24/2019	AX	Make revisions.	0.4	
10/24/2019	AX	Additional research and writing re: CA rules of PR.	1.5	
10/24/2019	AX	Review emails re: discovery responses.	0.5	
10/24/2019	AX	Make final revisions to memo and send to cocounsel.	0.3	
10/24/2019	KES	Download and circulate pleadings.	0.1	
10/24/2019	KES	Review memo re meet and confer.	0.1	
10/25/2019	BBK	Reviewing letter from opposing counsel reporting supplemental production.	0.1	
10/28/2019	GCG	Review and revise MJ meet and confer letter.	0.1	
10/28/2019	GCG	Email to MJ and team re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/28/2019	BBK	Conferring w/ T. Close re document coding.	0.1	
10/28/2019	BBK	Conferring w/ KES re document coding.	0.1	
10/28/2019	BBK	Conducting document coding/analysis on Relativity of recent Defendant productions.	1.8	
10/28/2019	KES	Continue review and coding of Defs document production.	1.6	
10/29/2019	GCG	Conf with JSY and AX regarding memory care plaintiff and expert witness research.	0.3	
10/29/2019	BBK	Reviewing M. Johnson letter memorializing 10/24 telephonic meet and confer and proposing compromise position on arbitration-based discovery and proposing revisions thereto.	0.3	
10/29/2019	BBK	Conferring w/ KES re document coding.	0.1	
10/29/2019	BBK	Conducting document coding/analysis of Defendants' productions.	3.0	
10/29/2019	BBK	Reviewing GCG-M.Johnson communications re meet and confer letter and status of telephone line for class member outreach; conferring w/ team re setting up access to Sharepoint for tracking class member contacts.	0.1	
10/29/2019	AX	Read discovery letter and other email correspondence.	0.8	
10/29/2019	AX	Meet with GCG, JY to discuss new projects.	0.5	
10/29/2019	AX	Research and update memo re: communication with prior Brookdale employees.	1.0	
10/29/2019	AX	Discuss document review with KS.	0.2	
10/29/2019	KES	Download and circulate pleading.	0.1	
10/29/2019	KES	Review and code defendant document production in Relativity.	3.3	
10/30/2019	GCG	Comment on revised script for class member communications.	0.1	
10/30/2019	GCG	Email MJ regarding AG's position on subpoena and doc production.	0.1	
10/30/2019	BBK	Reviewing M. Johnson history of meeting and conferring w/ Deputy AG re CDSS subpoenas and proposed response to her latest position.	0.1	
10/30/2019	BBK	Reviewing AX memo to team on legal/ethical rules regarding communications w/ former Brookdale employees.	0.1	
10/30/2019	BBK	Conducting document coding and analysis of Brookdale production.	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2019	AX	Review memo re: communications with ex employees and send to co-counsel.	0.8	
10/31/2019	GCG	Review 9th Cir order denying defendant's motion for stay.	0.1	
10/31/2019	GCG	Emails to co-counsel regarding same.	0.1	
10/31/2019	BBK	Reviewing 9th Cir order denying BD's motion to stay district court proceedings while appeal pending.	0.1	
10/31/2019	BBK	Conferring with KES regarding arbitration opt-out example located during document coding.	0.1	
10/31/2019	BBK	Conducting document coding in Relativity.	1.2	
10/31/2019	JSY	Review order from 9th Cir. on Motion for Stay; emails regarding same.	0.2	
10/31/2019	KES	Download and circulate order.	0.1	
10/31/2019	KES	Continue review and coding of defendants' document production.	3.2	
11/1/2019	GCG	Prepare for and conduct meeting w/ BBK, JSY, AX, KES and EH re document review and class cert motion.	1.0	
11/1/2019	GCG	Prepare for class member calls and outreach.	0.3	
11/1/2019	GCG	Conf w/ MJ and email to GW re same.	0.2	
11/1/2019	GCG	Conf w/ JY and emails to team re 9th Cir affirmance.	0.1	
11/1/2019	BBK	Conducting document coding in Relativity.	0.7	
11/1/2019	BBK	Reviewing AX's updated case task list for RBGG.	0.1	
11/1/2019	BBK	Conferring w/ KES re document analysis.	0.1	
11/1/2019	BBK	RBGG team meeting on case tasks and strategy.	0.7	
11/1/2019	BBK	Conferring w/ RBGG coding team re call w/ M. Johnson re coding priorities and outreach to M. Johnson re this.	0.2	
11/1/2019	BBK	Reviewing M. Johnson report to co-counsel re status of CM outreach and plan of attack.	0.1	
11/1/2019	AX	Update Brookdale to-do list.	0.4	
11/1/2019	JSY	Team meeting.	0.5	
11/1/2019	KES	Online research re Brookdale SEC filings.	1.1	
11/1/2019	KES	Team meeting re discovery and class outreach issues.	0.8	
11/1/2019	KES	Email team re document coding issues.	0.1	
11/1/2019	EH	Weekly conference re: Brookdale (reviewing docs on relativity, fielding calls from potential class members, etc.).	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/2/2019	GCG	Revise class member letters and call script.	0.4	
11/2/2019	GCG	Emails to MJ and team re same.	0.2	
11/2/2019	AX	Read and send email correspondence.	0.2	
11/4/2019	GCG	Attend to class member outreach letters and website update.	0.2	
11/4/2019	GCG	Email to MJ and team re same.	0.1	
11/4/2019	GCG	Conf w/ and email to KES re SEC reports.	0.1	
11/4/2019	GCG	Review and comment on 4th request for production.	0.1	
11/4/2019	GCG	Review potential oral argument dates.	0.1	
11/4/2019	GCG	Conf w/ and email to JSY re 9th Cir response.	0.2	
11/4/2019	BBK	Reviewing KES report to team re relevant portions of Brookdale's recent SEC filings.	0.1	
11/4/2019	BBK	Reviewing GCG and AX comments on M. Johnson's report on CM outreach project commencement; communications w/ co-counsel re finalizing websites.	0.1	
11/4/2019	BBK	Reviewing revised version of CM Outreach Script and revised CM outreach letters for assisted living and memory care.	0.3	
11/4/2019	BBK	Reviewing M. Johnson's draft RFP Set 4 and GCG comments re revisions thereto.	0.3	
11/4/2019	BBK	(Billing Judgment) Reviewing 9th Circuit Order re scheduling oral argument calendar in March/April/May 2020.	0.0	0.1
11/4/2019	JSY	Emails re case website for class member calls.	0.2	
11/4/2019	JSY	Emails re RFP set 4.	0.1	
11/4/2019	JSY	Review oral argument dates; conf. w/ GCG and KES re same.	0.3	
11/4/2019	JSY	Review Reply brief.	0.7	
11/4/2019	KES	Circulate court notice re oral argument, calendar deadlines, review local rules re filing of availability notice and confer JY re same.	0.5	
11/4/2019	KES	Email to team re Brookdale financial information.	0.1	
11/4/2019	EH	Conference with KES re document review on relativity.	0.4	
11/4/2019	EH	Reviewed documents produced by defendants and coded for issues.	0.5	
11/5/2019	GCG	Review email to JA and JY re Brookdale fee increases.	0.1	
11/5/2019	BBK	Reviewing report re putative class member at Brookdale Brookhurst.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/5/2019	BBK	Attending to Relativity coding call w/ M. Johnson and RBGG coding team (including emailing with all).	0.2	
11/5/2019	AX	Email correspondence re coding.	0.2	
11/5/2019	JSY	Emails with JA re price increase.	0.1	
11/5/2019	KES	Review and code defendants document production in Relativity.	3.5	
11/6/2019	BBK	Reviewing M. Johnson report to team re plan for commencement of CM outreach by letter and JY's proposed modification to send CM outreach to memory care prospective Cms ASAP.	0.1	
11/6/2019	BBK	Conferring w/ M. Johnson and RBGG coding team re conference call on Relativity coding today.	0.1	
11/6/2019	BBK	Reviewing exemplars of documents ID'ed by KES during Relativity coding that raise questions in advance of Relativity coding call w/ M. Johnson and conferring w/ KES re this.	0.2	
11/6/2019	BBK	Relativity coding call w/ M. Johnson and RBGG coding team.	0.8	
11/6/2019	BBK	Conferring w/ RBGG coding team post-call w/ M. Johnson.	0.1	
11/6/2019	BBK	Reviewing M. Johnson outreach to opposing counsel re CDSS counsel's request for assurance that Brookdale will not separately subpoena same records Plaintiffs seek via subpoena and will instead obtain them from Plaintiffs via discovery if necessary.	0.1	
11/6/2019	JSY	Emails re class member letters.	0.1	
11/6/2019	JSY	Emails with JA re rate increase.	0.1	
11/6/2019	JSY	Meeting re coding and document review protocol.	0.9	
11/6/2019	JSY	Review email from JA re rate increase; conf. w/ GCG re same; respond to same.	0.3	
11/6/2019	KES	Conference call with co-counsel re defendant document production coding issues and priorities; prepare questions and examples for meeting.	1.7	
11/6/2019	KES	Email re: website.	0.1	
11/6/2019	KES	Continue review and coding of documents in Relativity.	2.0	
11/6/2019	KES	Review email from client.	0.1	
11/6/2019	EH	Conference with MJ re: coding documents produced by defendants on relativity.	0.9	
11/7/2019	GCG	Conf w/ AX and emails to MJ re confidentiality attestations for class member outreach and discovery issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/7/2019	BBK	Conferring w/ co-counsel re acknowledgments of agreements to be bound by protective orders; reviewing communications w/ opposing counsel re 60,000 document production coming tomorrow.	0.1	
11/7/2019	BBK	Conferring w/ KES re coding priorities and protocols.	0.2	
11/7/2019	AX	Email correspondence re coding and class member outreach.	0.4	
11/7/2019	KES	Review emails re document production.	0.1	
11/7/2019	EH	Reviewed document production produced by defendants and coded for issues.	2.8	
11/8/2019	GCG	Conf w/ BBK< JSY, AX, KES and EH re document review and class member outreach.	0.6	
11/8/2019	GCG	Review MJ emails serving 4th request for production and demanding compliance w/ Beeler order re contracts.	0.1	
11/8/2019	GCG	Review and analyze spreadsheet of complaints.	0.1	
11/8/2019	GCG	Email BBK and team re same.	0.1	
11/8/2019	BBK	Reviewing M. Johnson demand email to opposing counsel re continuing failure to produce residency agreement forms ordered produced by MJ Beeler in response to Plaintiffs' MTC on 7/25/19.	0.1	
11/8/2019	BBK	Reviewing updated case task list by AX.	0.1	
11/8/2019	BBK	RBGG team meeting on case strategy and tasks.	0.5	
11/8/2019	BBK	Locating/forwarding Excel chart of complaints by residents/families to RBGG team and conferring w/ GCG and KES re contents and analysis needed.	0.3	
11/8/2019	BBK	Reviewing KES's weekly findings based on document coding and distributing to coding team.	0.1	
11/8/2019	BBK	Meeting w/ EH re analysis of Excel sheet of complaints by residents and families.	0.2	
11/8/2019	BBK	Conferring w/ M. Johnson re document coding plan and weekly distribution email of findings by RBGG coders.	0.1	
11/8/2019	BBK	Reviewing M. Johnson request for comments on draft 30(b)(6) deposition notice and GCG response.	0.1	
11/8/2019	AX	Revise and send out to-do list before/after meeting.	0.3	
11/8/2019	AX	Team meeting.	0.6	
11/8/2019	AX	Review document protocol and hot documents.	0.2	
11/8/2019	JSY	Team meeting.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/8/2019	KES	Meet with team re discovery issues, class member outreach; follow up document review and emails re same.	0.7	
11/8/2019	EH	Reviewed defendants document production on relativity and coded for issues.	5.5	
11/8/2019	EH	Conference re coding and related tasks.	0.5	
11/9/2019	GCG	Review letter from defendants re doc production and email to team re same.	0.1	
11/11/2019	GCG	Review and revise draft PMK notice; email to MJ and team re same.	0.5	
11/11/2019	GCG	Review pleadings from related case; emails to TC and BBK and team re same.	0.2	
11/11/2019	GCG	Email to GW re strategic issues and call to discuss.	0.2	
11/11/2019	BBK	Reviewing letter from Defendants re 11/9 document production and GCG comments thereon.	0.1	
11/11/2019	BBK	Reviewing Motion to Certify Class and Discovery Order distributed to team in Runton v. BD (Florida case) and summarizing relevant issues raised in email memo to team.	0.7	
11/11/2019	BBK	Conferring w/ GCG and co-counsel re obtaining discovery of task time estimates by BD and algorithms and related info for calculating staffing needs.	0.1	
11/11/2019	BBK	Reviewing Rule 30(b)(6) deposition notice draft by M. Johnson w/ GCG redlines.	0.2	
11/11/2019	BBK	Conferring w/ KES re Telecommunication Device Notification produced as part of resident files re deaf and hearing impaired residents of community care facilities' entitlement to accommodations under ADA.	0.1	
11/11/2019	AX	Read email correspondence re discovery issue.	0.8	
11/11/2019	KES	Update electronic research files.	0.1	
11/11/2019	KES	Review correspondence re new document production.	0.1	
11/11/2019	KES	Continue review and coding of defendant document production.	2.5	
11/11/2019	EH	Reviewed documents produced by defendants and coded for issues.	2.3	
11/12/2019	BBK	Reviewing/commenting on AX's draft coding protocol and comm'ns w/ AX/KES re revising prior to sending to co-counsel.	0.2	
11/12/2019	BBK	Reviewing opposing counsel's response to M. Johnson re their failure to produce all form residency agreements as required by MJ Beeler's July Discovery Order.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/12/2019	AX	Draft coding protocol.	0.8	
11/12/2019	AX	Discuss with cocounsel.	0.2	
11/12/2019	AX	Document review and coding.	4.0	
11/12/2019	KES	Continue review and coding of Brookdale document production.	1.5	
11/12/2019	KES	Review team emails re document coding.	0.1	
11/13/2019	GCG	Emails to MJ and DSS attorney re subpoena response.	0.1	
11/13/2019	BBK	Reviewing M. Johnson communications w/ counsel for CDSS re complying w/ our subpoenas and report re agreements reached on M&C call today.	0.1	
11/13/2019	BBK	Reviewing M. Johnson communications w/ opposing counsel re inspection schedule and re scheduling meet and confer call re BD form residency agreements not produced in response to MJ Beeler's July 2019 discovery order.	0.1	
11/13/2019	BBK	Conducting Relativity coding and analysis of documents.	1.0	
11/13/2019	AX	Document review and coding.	1.5	
11/13/2019	EH	Reviewed documents produced by defendants on relativity and coded for issues.	1.5	
11/14/2019	GCG	Conf w/ AX re research into possible experts.	0.2	
11/14/2019	GCG	Conf w/ MJ re issues to raise on meet and confer call w/ defendants.	0.1	
11/14/2019	GCG	Email to MJ, AX and team re sharepoint access and class member access.	0.1	
11/14/2019	BBK	Conferring w/ RBGG team re need for FU w/ Schneider Wallace re access to Sharepoint so that we can track and chart CM outreach now that first batch of letters sent.	0.1	
11/14/2019	BBK	Coding/analyzing documents in Relativity.	0.9	
11/14/2019	BBK	(Billing Judgment) Reviewing tardy filing by opposing counsel re: conflict with some proposed dates by 9th Cir for oral argument.	0.0	0.1
11/14/2019	AX	Draft email to co-counsel re: expert research.	0.3	
11/14/2019	AX	Research experts for nursing home standards.	5.2	
11/14/2019	AX	Draft memo on experts.	2.2	
11/14/2019	JSY	Emails re Sharepoint access.	0.1	
11/14/2019	JSY	Emails re oral argument.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/14/2019	EH	Reviewed documents produced by clients on relativity and coded for issues.	2.9	
11/15/2019	GCG	Conf w/ AX and email to team re status/doc review.	0.1	
11/15/2019	BBK	Reviewing T. Smith update re access to Schneider Wallace Sharepoint for CM outreach; setting up BBK access thereto.	0.2	
11/15/2019	BBK	Drafting request to RBGG coders to send their observations/questions/suggestions from Relativity coding this week for BBK to send to full team of coders.	0.1	
11/15/2019	BBK	Writing up BBK observations from this week's Relativity coding.	0.2	
11/15/2019	BBK	Conferring w/ KES, EH, and AX re their respective findings from this week's Relativity coding.	0.3	
11/15/2019	BBK	Drafting/sending email to full co-counsel coding team w/ RBGG coders' questions/suggestions & observations from this week's Relativity Coding.	0.4	
11/15/2019	BBK	Conferring w/ M. Johnson re adding additional Document Type tag for Relativity coding based on BBK's observations from this week's coding.	0.1	
11/15/2019	BBK	Conducting analysis and coding of documents in Relativity.	0.4	
11/15/2019	AX	Review discovery documents.	2.0	
11/15/2019	AX	Research experts to retain re: nursing home standards of care.	1.8	
11/15/2019	KES	Review team emails re document coding issues.	0.1	
11/15/2019	EH	Reviewed documents produced by defendants and coded for issues.	0.6	
11/18/2019	GCG	Review TC summary of call with putative class member.	0.1	
11/18/2019	GCG	Emails to MJ and team re same and re call w/ co-counsel.	0.1	
11/18/2019	BBK	Reviewing M. Johnson request for team meeting this week and proposed agenda; conferring w/ co-counsel team re meeting.	0.1	
11/18/2019	BBK	Reviewing M. Johnson memo re 11/14 meet and confer w/ Ds and T. Close revisions thereto.	0.1	
11/18/2019	BBK	Reviewing M. Johnson comm'ns w/ CDSS attorney confirming agreement re productions in response to our subpoenas and his request for any additional edits to Rule 30(b)(6) deposition notice.	0.1	
11/18/2019	BBK	Reviewing T. Close report re call w/ putative CM who reached out in response to letter and draft memo and notes from call.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/18/2019	BBK	Reviewing M. Johnson report re Board of Director meeting minutes in BD's latest production.	0.1	
11/18/2019	AX	Document review and coding.	1.0	
11/18/2019	KES	Review emails re document production issues and upcoming team meeting.	0.3	
11/19/2019	BBK	Conferring w/ EH re preliminary analysis of BD spreadsheet of complaints.	0.1	
11/19/2019	BBK	Reviewing EH's preliminary analysis of BD spreadsheet of complaints & drafting recommendation to RBGG team.	0.5	
11/19/2019	KES	Continue coding of defendant document production.	1.0	
11/19/2019	EH	Reviewed and analyzed Brookdale complaints sheet for substantive issues re: class certification and wide-spread issues across facilities.	3.0	
11/20/2019	GCG	Conf w/ GW re overall strategy and approach.	0.2	
11/20/2019	GCG	Emails to GW and KS re mediation communication to JB.	0.2	
11/20/2019	GCG	Prepare for and conduct call w/ MJ and team re discovery and class cert issues.	1.1	
11/20/2019	GCG	Email to GW and conf w/ JSY re class cert declarations.	0.2	
11/20/2019	BBK	Conferring w/ GCG re including EH's findings on spreadsheet of complaints and next steps on agenda for today's conference call w/ co-counsel.	0.1	
11/20/2019	BBK	Conferring w/ M. Johnson re adding discussion of findings from spreadsheet of complaints to agenda for co-counsel conference call.	0.1	
11/20/2019	BBK	Preparations for co-counsel conference call on case strategy and tasks.	0.3	
11/20/2019	BBK	Co-counsel conference call on case strategy and tasks.	1.3	
11/20/2019	BBK	Conferring w/ EH re next steps of analysis of data produced re complaints by BD residents/families.	0.1	
11/20/2019	BBK	Conferring w/ KES re recent findings from Relativity coding of BD documents.	0.1	
11/20/2019	BBK	Reviewing C. Flores Expert Declaration ISO Class Cert in Newirth v. Aegis distributed by co-counsel to guide in type of expertise needed for staffing expert.	0.3	
11/20/2019	AX	Cocounsel meeting.	1.3	
11/20/2019	AX	Document review.	2.2	
11/20/2019	AX	Review expert declaration.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/20/2019	JSY	Team meeting.	1.3	
11/20/2019	KES	Team meeting re discovery issues, client outreach, case strategy.	1.5	
11/20/2019	KES	Organize and review notes and documents re: discovery issues.	0.7	
11/20/2019	KES	Online research.	0.3	
11/20/2019	KES	Review memo and underlying document re complaints analysis.	0.3	
11/20/2019	EH	Conference with Brookdale team re case updates and tasks.	1.7	
11/21/2019	GCG	Review and revise email from MJ to defendants re arbitration and residency agreement discovery.	0.1	
11/21/2019	GCG	Email to MJ re class member outreach.	0.1	
11/21/2019	BBK	Reviewing W. Buffaloe email following up on Ds' proposal re certain discovery disputes from previous meet and confer & M. Johnson's draft response and GCG's comments thereon.	0.2	
11/21/2019	BBK	Document analysis and coding on Relativity.	0.3	
11/21/2019	KES	Continue review and coding of defendant document production.	0.8	
11/21/2019	KES	Review email re Brookdale document production.	0.1	
11/22/2019	GCG	Emails to AX and team re case tasks and deadlines.	0.1	
11/22/2019	GCG	Research re Brookdale structure.	0.1	
11/22/2019	GCG	Email to team re document production.	0.1	
11/22/2019	AX	Document review.	0.5	
11/22/2019	AX	Review task list and update.	0.2	
11/22/2019	AX	Email communications.	0.3	
11/22/2019	AX	Research potential staffing experts, draft memo to team.	1.5	
11/22/2019	JSY	Emails re class member communication.	0.1	
11/22/2019	KES	Review emails re Brookdale document production.	0.1	
11/25/2019	GCG	Conf w/ and email to KES re sharepoint training and letter from class member re do not contact.	0.1	
11/25/2019	GCG	Emails to MJ and team re doc review.	0.1	
11/25/2019	BBK	Reviewing communications w/ team re contact from putative class member requesting no further contact and ensuring tracking chart is updated accordingly.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/25/2019	BBK	Reviewing AX memo on potential experts who can opine on staffing at assisted living facilities.	0.2	
11/25/2019	BBK	Reviewing M. Johnson update re CM outreach status and training on Sharepoint tracking system for CM outreach; conferring w/ RBGG re same.	0.1	
11/25/2019	AX	Document review and coding.	3.5	
11/25/2019	JSY	Emails re class member communications.	0.1	
11/25/2019	KES	Emails with co-counsel re upcoming tasks.	0.2	
11/26/2019	GCG	Emails to MJ re ESI protocol.	0.1	
11/26/2019	GCG	Email to CG and team re MJ task list.	0.1	
11/26/2019	BBK	Reviewing M. Johnson draft tasklist for all co-counsel with assignments and deadlines.	0.1	
11/26/2019	JSY	Training in sharepoint and class member communications.	0.5	
11/26/2019	KES	Telephone conference with co-counsel re Sharepoint training.	0.6	
11/26/2019	KES	Telephone call to relative of putative class member.	0.3	
11/26/2019	EH	Brookdale training re: sharepoint and class member correspondence.	0.5	
11/27/2019	BBK	Reviewing letter from Defendants re production of next tranche of rolling doc prod.	0.1	
11/27/2019	KES	Review letter re new document production.	0.1	
11/29/2019	GCG	Email to team re CDSS subpoena deadline and production.	0.1	
12/2/2019	AX	Review referral information.	0.5	
12/2/2019	AX	Document review and coding.	3.2	
12/3/2019	GCG	Review and revise letter to defendants re outstanding discovery issues and need to adjust case schedule.	0.2	
12/3/2019	GCG	Email to MJ and team re same.	0.1	
12/3/2019	BBK	Reviewing M. Johnson letter to Defendants re discovery disputes.	0.2	
12/3/2019	BBK	Reviewing T. Close emails w/ opposing counsel re scheduling of December facility inspections.	0.1	
12/3/2019	AX	Document review; and coding.	1.5	
12/3/2019	EH	Organized incoming documents to file.	0.2	
12/4/2019	GCG	Revise email to GW and JB re class certification motion and need for new dates.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2019	GCG	Emails to potential class member and AX re issues experienced by her mother.	0.1	
12/4/2019	BBK	Reviewing G. Wallace's draft letter to opposing counsel re pushing back deadline for class cert motion ILO health issues and delays in discovery caused by Defendants.	0.1	
12/4/2019	BBK	Reviewing communications w/ RBGG team re contact rec'd from family member of CM at BD Cortona Park.	0.1	
12/4/2019	KES	Review correspondence re discovery issues.	0.1	
12/4/2019	KES	Review Sharepoint contact list and troubleshoot computer issues re same.	0.8	
12/5/2019	GCG	Research and draft email to MJ and team re Fountaingrove inspection and ED depositions.	0.4	
12/5/2019	GCG	Conf w/ JSY re same.	0.2	
12/5/2019	GCG	Email to GW and JB re postponing class cert motion.	0.1	
12/5/2019	GCG	Email to GW re meeting w/ DM.	0.1	
12/5/2019	JSY	Emails re depositions.	0.1	
12/5/2019	JSY	T/C with J. Algarme re new ED.	0.2	
12/5/2019	JSY	Emails re ED depositions.	0.2	
12/5/2019	JSY	Conf. w/ KES and GCG re same.	0.3	
12/5/2019	JSY	Emails re ED depositions.	0.2	
12/5/2019	JSY	Conf. w/ KES and GCG re same.	0.3	
12/5/2019	JSY	Emails re ED depositions.	0.2	
12/5/2019	JSY	Conf. w/ KES and GCG re same.	0.3	
12/5/2019	BBK	Reviewing communications w/ co-counsel re staffing facility inspections and conducting legal research.	0.1	
12/5/2019	BBK	Reviewing JY report re phone call w/ class rep.	0.1	
12/5/2019	BBK	Reviewing communications w/ co-counsel re potential deponents including current and former EDs.	0.1	
12/5/2019	KES	Update electronic files.	0.1	
12/5/2019	KES	Westlaw research.	0.3	
12/6/2019	GCG	Conf w/ MJ re discovery disputes and meet and confer plan.	0.1	
12/6/2019	GCG	Email to TC re preparation for Fountaingrove.	0.1	
12/6/2019	GCG	Conf w/ JSY re depositions of EDs and research re same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 249

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2019	GCG	Email to KES and AX e putative class member outreach.	0.1	
12/6/2019	GCG	Email to AX and conf w/ MJ re legal research re document retention issues.	0.1	
12/6/2019	BBK	Reviewing Senior Housing News article re Brookdale's hiring to fill newly created corporate position of Executive Vice President & President of Senior Living.	0.1	
12/6/2019	BBK	Reviewing communications between W. Buffaloe & M. Johnson re various discovery and scheduling disputes and setting meet and confer call for next week.	0.1	
12/6/2019	BBK	Reviewing JY report to co-counsel re proposed approach to reach out to former Exec Dirs of BD facilities and identifying who to potentially depose.	0.1	
12/6/2019	BBK	Reviewing KES memo re 12/3 call w/ attorney for relative of former BD Paso Robles resident re potential participation as declarant.	0.1	
12/6/2019	AX	Read email correspondence re discovery dispute and respond.	0.3	
12/6/2019	JSY	Emails re possible ED witnesses; review class list.	0.5	
12/6/2019	KES	Telephone conference with attorney for Brookdale resident relative, follow up emails and draft memo to team re same.	1.3	
12/6/2019	KES	Gather information for co-counsel in preparation for facility inspection.	0.1	
12/6/2019	KES	Review research re former Brookdale employee and confer JY re same.	0.6	
12/9/2019	GCG	Email to GW and team re meeting w/ DM.	0.1	
12/9/2019	GCG	Conf w/ AX re research project.	0.1	
12/9/2019	AX	Initial phone conversation with potential class member, KB.	0.5	
12/9/2019	AX	Email correspondence w/ KB.	0.1	
12/9/2019	AX	Confer w/ KS re: call.	0.1	
12/9/2019	AX	Review notes.	0.1	
12/9/2019	KES	Follow up class member outreach emails re three relatives of Brookdale residents; update chart re same.	0.7	
12/10/2019	GCG	Review meet and confer correspondence in preparation for call w/ defendants.	0.4	
12/10/2019	GCG	Email to MJ re same and re legal research.	0.2	
12/10/2019	GCG	Conf w/ AX re legal research re duty to retain documents after spinning off facilities.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/10/2019	BBK	Reviewing SF Chronicle article re Brookdale's sale of BD San Ramon that is resulting in closure of facility; reviewing update re DSS production of additional licensing files and re new phone inquiries from Cms in response to outreach requiring FU calls.	0.1	
12/10/2019	BBK	Reviewing AX's preliminary research re BD's obligation to retain files once litigation is filed, even for facilities that they subsequently sold, and comm'ns w/ team re this.	0.1	
12/10/2019	AX	Read emails and correspond with GCG re: research.	0.2	
12/10/2019	AX	Discuss class member outreach with KS.	0.5	
12/10/2019	AX	Review telephone conference notes.	0.3	
12/10/2019	AX	Draft memo.	0.5	
12/10/2019	AX	Draft email to cocounsel re: discovery meet and confer.	0.8	
12/10/2019	KES	Telephone conferences with relatives of two Brookdale residents; draft memo re same and update Sharepoint.	3.3	
12/10/2019	KES	Review memos re discovery issues and update electronic files re same.	0.3	
12/10/2019	EH	Reviewed documents produced by defendants and coded for case issues.	2.5	
12/11/2019	GCG	Prepare for and participate in meet and confer w/ defendants' counsel re MJ letter of December 3, 2019.	1.0	
12/11/2019	GCG	Emails to MJ, GW and TC re discovery issues.	0.1	
12/11/2019	GCG	Emails to AX re retention of documents research.	0.1	
12/11/2019	GCG	Emails to MJ, KES and team re calls from class members.	0.1	
12/11/2019	GCG	Conf w/ and email to JSY re calls w/ Executive Directors.	0.1	
12/11/2019	GCG	Conf w/ and email to GW re class certification schedule.	0.1	
12/11/2019	AX	Read email correspondence.	0.4	
12/11/2019	AX	Document on Sharepoint.	0.3	
12/11/2019	AX	Discuss outreach protocol w/ JY, KS, EH.	0.2	
12/11/2019	AX	Finish KB memo.	0.6	
12/11/2019	AX	Emails with KB.	0.2	
12/11/2019	AX	Review Sharepoint information and send emails to clarify.	0.5	
12/11/2019	AX	Research on document retention.	1.0	
12/11/2019	JSY	Phone calls to former EDs.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 251

SERVICES

Date	Person	Description of Services	Hours	Discount
12/11/2019	JSY	T/C with class member; emails re same.	0.3	
12/11/2019	KES	Troubleshoot Sharepoint issues.	0.5	
12/11/2019	KES	Telephone call with Brookdale resident.	0.5	
12/11/2019	KES	Memo summarizing call with relative of Brookdale resident and review documents re same.	1.1	
12/11/2019	KES	Email to team re same.	0.2	
12/11/2019	EH	Reviewed documents produced by defendants and coded for issues on relativity.	1.9	
12/12/2019	GCG	Email to GW re defendants' response to need to move class cert schedule.	0.1	
12/12/2019	BBK	Reviewing communications w/ co-counsel re outreach to class members who contacted us and call from former plaintiff at BD San Ramon; communications re agenda for 12/11 meet and confer call and response from opposing counsel re request to push back class cert deadline.	0.2	
12/12/2019	KES	Telephone call with two Brookdale residents in response to outreach.	1.8	
12/12/2019	EH	(Billing Judgment) Circulated article regarding case updates to the team.	0.0	0.3
12/12/2019	EH	Corresponded with co-counsel regarding sharepoint and potential class member outreach.	0.5	
12/13/2019	GCG	Confs w/ AX and KES re putative class member calls and experts.	0.2	
12/13/2019	GCG	Email to MJ and JK re discovery and need for call.	0.1	
12/13/2019	BBK	Reviewing M. Johnson communications w/ opposing counsel re continuing M&C on discovery disputes that was interrupted before all issues were addressed.	0.1	
12/13/2019	AX	Outreach conversations w/ potential class members.	1.8	
12/13/2019	AX	Review Sharepoint information.	0.3	
12/13/2019	AX	Draft memos for phone conversations.	1.2	
12/13/2019	AX	Research on document retention.	0.3	
12/13/2019	KES	Follow up email to Brookdale resident.	0.2	
12/13/2019	EH	Telephone conversation with potential class members at Brookdale Santa Monica Gardens.	0.7	
12/16/2019	GCG	Prepare for meeting w/ potential expert.	0.3	
12/16/2019	GCG	Emails to KES re client interviews.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/16/2019	BBK	Reviewing communications w/ RBGG team and co-counsel re FU on class outreach calls and potential declarants interviewed in response to outreach.	0.1	
12/16/2019	AX	Research, draft, revise memo re: document preservation.	1.8	
12/16/2019	AX	Prepare for meeting w/ cocounsel re: expert research.	0.8	
12/16/2019	JSY	Emails re class member calls.	0.1	
12/16/2019	KES	Telephone call with Brookdale resident.	1.0	
12/16/2019	KES	Draft summary and circulate memos re prior calls with Brookdale residents in response to outreach.	0.8	
12/16/2019	KES	Follow up email to team re status of calls and follow up issues.	0.2	
12/16/2019	EH	Drafted Memo to file regarding conversation with potential class members at Brookdale Santa Monica Gardens and circulated to the team.	1.8	
12/17/2019	GCG	Prepare for meeting w/ DM.	0.2	
12/17/2019	GCG	(Reduced Charge) Travel to participate in meeting w/ DM, GW, MJ, BU and AX re expert witness analysis and discovery to support it.	0.5	0.5
12/17/2019	GCG	Participate in meeting w/ DM, GW, MJ, BU and AX re expert witness analysis and discovery to support it.	2.1	
12/17/2019	AX	Outreach conversation re: Brookdale Lodi.	0.7	
12/17/2019	AX	Draft memo re same.	0.3	
12/17/2019	AX	(Reduced Charge) Travel to meet with cocounsel re: David Marks, potential experts.	0.5	0.5
12/17/2019	AX	Send research to cocounsel re: document retention.	0.1	
12/17/2019	AX	Meet with cocounsel re: David Marks, potential experts.	2.2	
12/17/2019	KES	Review status of Brookdale resident calls and follow up.	0.3	
12/17/2019	EH	Telephone call with daughter of potential class members at Brookdale Monrovia.	0.7	
12/17/2019	EH	Telephone conversation with potential class member at Brookdale San Marcos.	0.4	
12/17/2019	EH	Drafted memos to file regarding conversations with relatives of and potential class members at Brookdale Monrovia and Brookdale San Marcos.	2.9	
12/17/2019	EH	Organized and updated contact information for potential class members on SharePoint.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 253

SERVICES

Date	Person	Description of Services	Hours	Discount
12/17/2019	EH	Reviewed and sent follow-up correspondence to relatives of and potential class members at Brookdale facilities.	0.3	
12/18/2019	GCG	Email w/ GW re motion for class cert stip and order.	0.1	
12/18/2019	AX	Research re resources for potential class member.	0.8	
12/18/2019	KES	Follow up with team re individual issues for potential declarant.	0.4	
12/19/2019	GCG	Emails to GW and team re expert witness issue.	0.1	
12/19/2019	BBK	Reviewing communications w/ co-counsel re class outreach calls.	0.1	
12/19/2019	BBK	Conferring w/ KES re contact from putative CM re potential declaration ISO class cert.	0.1	
12/19/2019	BBK	Reviewing discovery dispute letter by M. Johnson memorializing 12/18 M&C call w/ opposing counsel.	0.1	
12/19/2019	AX	Emails re: expert research; confer w/ KS.	0.3	
12/19/2019	JSY	Calls with putative class members.	1.2	
12/19/2019	KES	Telephone conversation with relative of Brookdale resident and follow up email re same.	0.8	
12/19/2019	KES	Further follow up email to potential declarant.	0.2	
12/19/2019	KES	Confer AX re research re putative class members.	0.1	
12/19/2019	EH	Corresponded with two potential class members at Brookdale Folsom and Brookdale Garden Grove regarding class certification and case issues.	1.5	
12/19/2019	EH	Reviewed and organized updated class member correspondence info to SharePoint.	0.6	
12/20/2019	GCG	Review and analyze Aegis class cert decls relevant to expert retention.	0.4	
12/20/2019	GCG	Conf w/ AX re expert witness research.	0.2	
12/20/2019	GCG	Review AX memos re same and re doc retention.	0.2	
12/20/2019	BBK	Reviewing email re service of Ds' Responses to 4th Set of RFPs and need to M&C on responses; update re weekly rolling production.	0.1	
12/20/2019	AX	Brookdale expert research.	2.0	
12/20/2019	EH	Corresponded with potential class member at Brookdale San Jose (.8); drafted memo to file re conversation (1.2).	2.0	
12/23/2019	GCG	Conf w/ and email to KS re expert issues.	0.1	
12/23/2019	GCG	Email to MJ re discovery response chart; review same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/23/2019	GCG	Email to HF re RS conservatorship.	0.1	
12/23/2019	AX	Draft class member outreach memos.	0.7	
12/23/2019	JSY	Emails re class member calls.	0.1	
12/24/2019	GCG	Conf w/ JSY re putative class member calls.	0.1	
12/24/2019	JSY	Emails re class member calls; conf. w/ GCG re same.	0.2	
12/26/2019	GCG	Conference with JSY and emails with MJ and putative class member re class member communications and declarations.	0.2	
12/26/2019	JSY	Class member calls.	1.0	
12/26/2019	JSY	Draft memos re same.	1.0	
12/26/2019	JSY	Emails re same.	0.4	
12/27/2019	GCG	Review expert declarations from related case.	0.5	
12/27/2019	GCG	Research re potential experts; emails BBK-AX-KES re same.	0.9	
12/27/2019	GCG	Draft memo to file re potential experts.	0.5	
12/27/2019	GCG	Email GW re stipulation to move class certification motion.	0.1	
12/27/2019	GCG	Conferences with JSY and email with team re putative class member calls and declarations.	0.3	
12/27/2019	GCG	Email potential declarant.	0.1	
12/27/2019	JSY	Class member calls and draft memos re same.	1.4	
12/27/2019	JSY	Conf. w/ GCG re expert issues.	0.2	
12/29/2019	GCG	Revise memo to file re expert witnesses.	0.2	
12/30/2019	GCG	Prepare for and conduct call with KS re expert witnesses and class certification motion.	0.4	
12/30/2019	GCG	Review AX memo re expert witness and co-counsel research.	0.2	
12/30/2019	GCG	Email KES re same.	0.1	
12/30/2019	GCG	Emails with MJ, defense counsel re meet and confer.	0.1	
12/30/2019	AX	Review and revise memo re potential experts.	1.5	
12/30/2019	KES	Review status of outreach calls and follow up emails to team and to potential declarants; review documents sent by Brookdale residents.	1.7	
12/30/2019	KES	Westlaw people research for use in class cert. motion.	1.3	
12/31/2019	GCG	Conference with KES re research into potential experts.	0.1	
12/31/2019	GCG	Review AX memorandum re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/31/2019	GCG	Email MJ re discovery meet and confer call with Defendants.	0.1	
12/31/2019	BBK	Reviewing BD team communications re expert research and re meet and confer w/ Ds over discovery disputes.	0.1	
12/31/2019	BBK	Reviewing JY memos re recent calls w/ family members of putative Cms in response to CM outreach.	0.1	
12/31/2019	KES	Additional background research.	1.0	
12/31/2019	KES	Confer EH re call to relative of Brookdale resident.	0.1	
1/2/2020	GCG	Conf w/ MJ and email to GW and KS re discovery disputes and motion for class cert.	0.3	
1/2/2020	AX	Brookdale outreach calls and draft memos re same.	2.5	
1/2/2020	KES	TC relative of Brookdale resident and update Sharepoint re same.	0.3	
1/2/2020	KES	Review status of outreach calls.	0.2	
1/3/2020	GCG	Conf w/ GW and KS re overall strategy, experts and class cert motion.	0.8	
1/3/2020	GCG	Follow up emails from GW and KS re same.	0.2	
1/3/2020	GCG	Conf w/ AX, KES and EH re document coding and conferences w/ putative class members.	0.5	
1/3/2020	GCG	Email to MJ and team re same.	0.2	
1/3/2020	AX	Outreach calls to class members.	2.0	
1/3/2020	AX	Draft memos.	2.0	
1/3/2020	AX	Meeting with team.	0.6	
1/3/2020	AX	Review communication with team.	0.6	
1/3/2020	EH	Weekly team conference.	0.6	
1/4/2020	GCG	Research and emails re experts.	0.1	
1/5/2020	GCG	Research and draft email re Brookdale insurance, financial situation and expert witnesses.	0.4	
1/5/2020	GCG	Emails to AX and MJ re class member calls and document review and coding.	0.1	
1/5/2020	GCG	Email to GW re stipulation to move class cert motion; review same.	0.2	
1/5/2020	AX	Review emails.	0.2	
1/6/2020	GCG	Research and emails re co-counsel and expert issues.	0.6	
1/6/2020	GCG	Email to AX and AK re document review.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/6/2020	GCG	Review co-counsel memo re medical file documents.	0.2	
1/6/2020	GCG	Review JB email re stipulation.	0.1	
1/6/2020	SJR	Email re experts.	0.2	
1/6/2020	BBK	Reviewing communications w/ team.	0.1	
1/6/2020	BBK	Reviewing M. Johnson's updated tasklist and communications w/ RBGG team re meeting on 1/7.	0.1	
1/6/2020	BBK	(Billing Judgment) Reviewing KES/AX communications re drafting class member declarations; reviewing communications between G. Wallace and opposing counsel re stipulation re case schedule and deadline to file class cert.	0.0	0.1
1/6/2020	BBK	Reviewing KES/AX communications re drafting class member declarations.	0.1	
1/6/2020	AX	Brookdale email communication re: outreach and document review.	0.6	
1/6/2020	AX	Outreach calls, follow up emails, and memos.	2.5	
1/6/2020	AX	Update and review Sharepoint information.	0.5	
1/6/2020	AX	(Billing Judgment) Reconcile to-do list.	0.0	0.5
1/6/2020	AX	Email communication re: declarations.	0.3	
1/6/2020	AX	Review residency agreements.	0.5	
1/6/2020	AX	Discuss w/ KS.	0.3	
1/6/2020	KES	Update electronic files.	0.2	
1/6/2020	KES	Email team re draft declarations.	0.2	
1/6/2020	KES	Review emails re coding and outreach issues.	0.1	
1/6/2020	KES	Review discovery memo.	0.2	
1/6/2020	KES	Telephone conferences with relatives of two Brookdale residents and update Sharepoint; review status of outreach calls re same.	1.7	
1/6/2020	KES	Review residency agreement sent by Brookdale resident.	0.1	
1/6/2020	EH	Sent follow-up emails and phone calls requesting residency agreements from potential class members at Brookdale Santa Monica Gardens, San Marcos, and San Jose.	0.7	
1/7/2020	GCG	Team meeting to discuss declaration drafting strategy.	0.8	
1/7/2020	GCG	Email to GW, MJ and team re meet and confer call w/ defendants.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/7/2020	GCG	Emails to AX and team re class member calls and outreach.	0.1	
1/7/2020	GCG	Review emails to JB and GW re class certification schedule and stipulation.	0.1	
1/7/2020	BBK	Conferring w/ team and co-counsel.	0.1	
1/7/2020	BBK	RBGG team meeting re obtaining CM declarations and outreach.	0.7	
1/7/2020	BBK	Reviewing AX update to RBGG team re conference call w/ co-counsel re CM outreach and document coding.	0.1	
1/7/2020	AX	Discuss class member declarations.	0.6	
1/7/2020	AX	Prep for call w/ cocounsel.	0.4	
1/7/2020	AX	Discuss outreach and document review.	0.6	
1/7/2020	AX	Summarize call and review memo.	0.7	
1/7/2020	AX	Review declaration template.	0.4	
1/7/2020	AX	Outreach calls and memos.	1.8	
1/7/2020	JSY	Meeting re declarations.	0.5	
1/7/2020	KES	Telephone conference with co-counsel re outreach calls and document review; review email re same.	0.7	
1/7/2020	KES	Team meeting re drafting declarations and follow up re same.	0.7	
1/7/2020	KES	Review email re coding assignments.	0.1	
1/7/2020	KES	Review status of outreach calls.	0.2	
1/7/2020	EH	Conference with co-counsel regarding potential class member outreach, document production review, etc.	0.6	
1/7/2020	EH	Corresponded with potential class member at Brookdale San Jose re residency agreements.	0.3	
1/7/2020	EH	Outreach call with resident at Brookdale Lodi re class action suit and living conditions at facility.	0.9	
1/7/2020	EH	Organized and updated sharepoint information re class member outreach.	0.3	
1/8/2020	GCG	Review and revise draft class cert declarations.	0.7	
1/8/2020	GCG	Confs w/ JSY and KES and emails to AX and team re research and calls for same.	0.3	
1/8/2020	GCG	Review draft stipulation re class cert motion; emails to GW and JB re same.	0.2	
1/8/2020	GCG	Review AX memo re document review and class member outreach.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 258

SERVICES

Date	Person	Description of Services	Hours	Discount
1/8/2020	GCG	Draft letter to named plaintiffs re mediation outcome and class cert motion.	0.3	
1/8/2020	SJR	Emails re expert issues.	0.3	
1/8/2020	BBK	Reviewing stipulation to extend class cert deadline; reviewing communications w/ co-counsel and RBGG team re outreach to Cms and declaration drafting.	0.1	
1/8/2020	AX	Outreach calls and draft memos.	0.8	
1/8/2020	JSY	Emails re declarations.	0.1	
1/8/2020	KES	Update electronic files.	0.2	
1/8/2020	KES	Download and circulate pleading.	0.1	
1/8/2020	KES	Review email re new outreach calls.	0.1	
1/9/2020	GCG	Run new opp counsel through conflicts.	0.1	
1/9/2020	GCG	Participate in meet and confer w/ BB, SH, MJ, TC and SC and follow up call w/ co-counsel.	1.4	
1/9/2020	GCG	Prepare list of issues for lead counsel call.	0.4	
1/9/2020	GCG	Review of outstanding discovery issues chart.	0.2	
1/9/2020	GCG	Conf w/ BBK and EH re complaints meet and confer.	0.3	
1/9/2020	GCG	Emails to GW, KS, SJR and GW re expert witness issues.	0.2	
1/9/2020	GCG	Email to AX re member care outreach and calls.	0.1	
1/9/2020	SJR	Emails with MB, GG re meeting.	0.2	
1/9/2020	BBK	Reviewing AX report re call w/ potential declarants.	0.1	
1/9/2020	BBK	Reviewing materials re status of resident complaints and conferring w/ EH by email re status of analysis of resident complaints.	0.3	
1/9/2020	BBK	Meeting w/ GCG and EH re status of analysis of resident complaints spreadsheet and plan for requesting underlying complaints via M&C.	0.2	
1/9/2020	BBK	Meeting w/ EH before and after GCG meeting re next steps for complaint spreadsheet analysis.	0.2	
1/9/2020	BBK	Reviewing GCG's list of items for lead counsel impasse meet and confer call.	0.1	
1/9/2020	AX	Discuss outreach question and declaration issue with GCG.	0.2	
1/9/2020	AX	Read email correspondence.	0.3	
1/9/2020	AX	Review emails from potential declarant.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/9/2020	AX	Draft email re: class member outreach.	0.2	
1/9/2020	AX	Review documents and draft email re: pendant response times.	0.4	
1/9/2020	KES	Telephone conference with two Brookdale resident relatives and update Sharepoint re same; review status of new callers.	1.0	
1/9/2020	KES	Review emails and documents re discovery issues.	0.3	
1/9/2020	EH	Telephone call with relative of memory care resident at Brookdale Folsom re case and living conditions.	0.6	
1/9/2020	EH	Drafted memos to file re class member outreach with two residents at Brookdale Lodi and Brookdale Folsom.	1.0	
1/9/2020	EH	Corresponded with potential class members and relatives of residents.	0.3	
1/9/2020	EH	Conference with BBK re review of complaints spreadsheet produced by opposing counsel.	0.5	
1/9/2020	EH	Conference with GCG and BBK re upcoming meet and confer and analysis of complaints spreadsheet.	0.3	
1/10/2020	GCG	Prepare for call w/ KS and GW re expert witnesses.	0.3	
1/10/2020	GCG	Conf w/ JSY, AX, KES and EH re calls w/ class members, documents coding and declaration drafting.	0.4	
1/10/2020	GCG	Email to GW re Impasse call w/ lead counsel.	0.1	
1/10/2020	BBK	Reviewing EH analysis re categories of complaints to seek via M&C.	0.1	
1/10/2020	BBK	Drafting M&C letter seeking supplemental production of written complaints in sub-categories from spreadsheet.	1.0	
1/10/2020	AX	Weekly meeting with team.	0.4	
1/10/2020	AX	Draft and review emails to class member.	0.7	
1/10/2020	JSY	Team meeting.	0.4	
1/10/2020	KES	Team meeting re case status and tasks.	0.3	
1/10/2020	KES	Telephone conferences with relatives of two Brookdale residents and follow up emails re same; update Sharepoint re same.	1.5	
1/10/2020	KES	Review memo re document title analysis.	0.1	
1/10/2020	EH	Analyzed spreadsheet of complaints produced by opposing counsel for upcoming RFP letter, screened for substantive issues.	2.2	
1/11/2020	GCG	Review BBK meet and confer letter; email team re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/12/2020	GCG	Review KS information about DM and experts; emails GW, KS, SJR and MWB re same.	0.2	
1/12/2020	GCG	Review guidelines for oral argument and oversee calendaring of same; emails to GW and team re same.	0.2	
1/12/2020	SJR	Email from GG re experts.	0.1	
1/13/2020	GCG	Prepare for and conduct call w/ GW and KS re experts and overall strategy.	0.8	
1/13/2020	GCG	Emails to BBK and team re meet and confer letter re complaint production.	0.2	
1/13/2020	GCG	Conf w/ KES re class member outreach.	0.1	
1/13/2020	BBK	Reviewing GCG/G.Wallace comments on draft M&C Ltr re resident complaints and finalizing letter.	0.5	
1/13/2020	AX	Outreach communication with class members re: arbitration provision and opt-out.	0.6	
1/13/2020	KES	Telephone calls with relatives of Brookdale class members and update Sharepoint re same; follow up emails re same.	1.5	
1/13/2020	KES	Download and circulate oral argument notice and related documents and calendar deadline re same.	0.4	
1/13/2020	KES	Begin review and analysis of Shift Reports produced by Defendants.	1.3	
1/13/2020	EH	Finalized and sent out letter to opposing counsel regard Request for Production of Documents (RFP).	1.0	
1/14/2020	GCG	Conf w/ SJR and MWB re expert witnesses.	1.2	
1/14/2020	GCG	Emails to KS and GW re same.	0.4	
1/14/2020	GCG	Research re experts.	0.6	
1/14/2020	GCG	Review KES summary of class member call.	0.1	
1/14/2020	GCG	Confs w/ SJR, MWB and JSY re oral argument.	0.2	
1/14/2020	MWB	Prepare for and meet with SJR and GCG re experts and strategy.	1.0	
1/14/2020	SJR	Emails and conference with GG and MB re experts.	1.5	
1/14/2020	BBK	Reviewing KES report from daughter of resident of BD San Juan Capistrano witnessing understaffing.	0.1	
1/14/2020	AX	Email communications with potential class members.	0.5	
1/14/2020	JSY	Emails re call from class member.	0.1	
1/14/2020	JSY	Multiple conf. with team members re oral argument.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/14/2020	KES	Review and exchange emails with relative of Brookdale resident and email team re same.	0.3	
1/14/2020	KES	Confer JY re class member relative follow up.	0.1	
1/15/2020	GCG	Conf w/ KS re expert witnesses.	0.2	
1/15/2020	GCG	Conf w/ expert witness re reports.	0.2	
1/15/2020	GCG	Conf w/ and emails to GW re experts, motion for class cert and motion to compel.	0.5	
1/15/2020	GCG	Conf w/ JSY re 9th Cir. filing and oral argument prep.	0.2	
1/15/2020	SJR	Email from GG re experts.	0.2	
1/15/2020	BBK	Reviewing communications w/ RBGG team re putative class member.	0.1	
1/15/2020	JSY	Conf. w/ GCG and KES re argument and acknowledgment form; file same.	0.2	
1/15/2020	KES	Brief review of documents sent by Brookdale residents.	0.1	
1/15/2020	KES	File acknowledgment of hearing for JY.	0.3	
1/15/2020	KES	Review email re new outreach calls.	0.1	
1/16/2020	SJR	Research Unruh Act and email GG.	0.2	
1/17/2020	GCG	Review and respond to GW emails re Brookdale 10-K review.	0.2	
1/17/2020	SJR	Email from GG re damages.	0.2	
1/20/2020	GCG	Prepare for and conduct call w/ GW and KS re class cert motion and experts.	1.2	
1/20/2020	GCG	Review and revise draft Carlson decl ISO class cert.	0.2	
1/20/2020	GCG	Emails to JC re factual background for declaration.	0.2	
1/20/2020	GCG	Draft email to AX re legal and factual research for damages claim.	0.1	
1/21/2020	GCG	Prepare for and conduct call w/ DM, KS and GW re expert analysis of staffing.	1.0	
1/21/2020	GCG	Revise BBK email to defendants re complaint meet and confers.	0.1	
1/21/2020	GCG	Conf w/ AX re legal and factual research re damages.	0.1	
1/21/2020	BBK	Reviewing WB response to BBK M&C Letter on resident complaints conferring w/ GCG re responding.	0.2	
1/21/2020	BBK	Drafting/emailing response to WB re meet and confer re discovery dispute over resident complaints.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/21/2020	AX	Email communications and meet with GCG re: memo on damages, community fees.	0.4	
1/21/2020	AX	Read emails re: meet and confer calls.	0.1	
1/21/2020	EH	Correspond and review documents from potential class member at Brookdale San Marcos.	0.5	
1/22/2020	KES	Review email re new outreach calls.	0.1	
1/23/2020	BBK	Following-up w/ opposing counsel re scheduling M&C on discovery dispute.	0.1	
1/23/2020	AX	Draft memo about damages; review files and charges for named plaintiffs.	2.6	
1/24/2020	GCG	Team meeting to discuss calls w/ clients, legal research and document review.	0.3	
1/24/2020	GCG	Conf w/ and email to BBK re meet and confer w/ BB re complaints.	0.1	
1/24/2020	BBK	Prepare for team meeting.	0.1	
1/24/2020	BBK	RBGG team meeting on case tasks and strategy.	0.3	
1/24/2020	BBK	Call opposing counsel re meet and confer on resident complaints.	0.1	
1/24/2020	JSY	Meeting with team re next steps.	0.3	
1/24/2020	KES	Review email re Brookdale and follow up with team re same.	0.1	
1/24/2020	KES	Team meeting re case status, class outreach.	0.3	
1/24/2020	KES	Continue review and analysis of shift report documents.	1.8	
1/24/2020	EH	Weekly conference re case issues (class certification, document analysis, etc.).	0.3	
1/26/2020	GCG	Review BB email re meet and confer and email BBK re same.	0.1	
1/27/2020	GCG	Emails to defendants and BBK re complaints meet and confer.	0.1	
1/27/2020	GCG	Email to GW and KS re DM follow up.	0.1	
1/27/2020	BBK	Conferring w/ GCG re meet and confer call w/ opposing counsel on discovery dispute over resident complaints.	0.2	
1/27/2020	KES	Continue review and analysis of shift report documents.	0.7	
1/27/2020	EH	Phone call with relative of resident at Brookdale Santa Monica Gardens re case updates and conditions at the facility.	0.5	
1/27/2020	EH	Follow-up correspondence with Brookdale residents at Brookdale San Marcos and Santa Monica Gardens re request for residency agreements.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 263

SERVICES

Date	Person	Description of Services	Hours	Discount
1/28/2020	GCG	Prepare for and conduct meet and confer call w/ MP, BB and BBK.	0.6	
1/28/2020	GCG	Conf w/ TC re same.	0.1	
1/28/2020	GCG	Emails to BBK and co-counsel re same.	0.1	
1/28/2020	GCG	Email to GW re class cert deadline.	0.1	
1/28/2020	BBK	Conferring w/ WB and GCG re meet and confer.	0.1	
1/28/2020	BBK	Meeting w/ GCG re plan of attack and our position and potential compromises for meet and confer call on resident complaint discovery dispute.	0.1	
1/28/2020	BBK	Preparing for meet and confer call on resident complaint discovery dispute (reviewing relevant letters and documents, and prepping talking points and positions).	0.8	
1/28/2020	BBK	Conducting meet and confer w/ opposing counsel on resident complaint discovery dispute (w/ GCG & T. Close).	0.4	
1/28/2020	BBK	Conferring w/ GCG and T. Close re next steps post-meet and confer w/ opposing counsel on resident complaint discovery dispute.	0.1	
1/28/2020	BBK	Drafting/sending update to RBGG team and co-counsel re outcome of meet and confer w/ opposing counsel on resident complaint discovery dispute and next steps.	0.2	
1/28/2020	AX	Research and draft memo re: case law on damages under Unruh Act and CLRA.	2.5	
1/28/2020	KES	Review status of class member calls.	0.2	
1/28/2020	KES	Review email re meet and confer re document production.	0.1	
1/29/2020	AX	Research and draft memo re: statutory damages, punitive damages, treble damages pursuant to CLRA, Unruh, and other CA laws.	4.6	
1/30/2020	GCG	Conf w/ JSY re preparation for oral argument.	0.1	
1/30/2020	AX	Research memo on damages.	1.1	
1/30/2020	KES	Telephone call with relative of Brookdale resident and follow up email re same; update database re same.	0.6	
1/31/2020	GCG	Review MJ meet and confer letters; email MJ re same and re class cert schedule.	0.2	
1/31/2020	GCG	Conf w/ BBK and team re complaints motions to compel and class member contacts.	0.3	
1/31/2020	GCG	Email to JSY re class member letter.	0.1	
1/31/2020	BBK	RBGG team meeting re case strategy and tasks.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/31/2020	BBK	Reviewing two meet and confer letters sent today by M. Johnson to opposing counsel re production of residency agreements, ESI, and other discovery issues.	0.2	
1/31/2020	BBK	Reviewing letter from opposing counsel re rolling production of docs and objections to site inspections served today.	0.1	
1/31/2020	BBK	Reviewing JY/GCG communications re contact from putative class member re issues at BD facility.	0.1	
1/31/2020	AX	(Reduced Charge) Brookdale team meeting.	0.3	0.2
1/31/2020	JSY	Team meeting.	0.3	
1/31/2020	JSY	Emails re letter from class member.	0.1	
1/31/2020	EH	Weekly conference re case updates, class member declarations/outreach, etc.	0.3	
2/1/2020	GCG	Review court order re stipulation to extend class cert deadline.	0.1	
2/1/2020	GCG	Emails to GW, MJ and KS re same.	0.2	
2/1/2020	GCG	Legal research re settlement approval and mediation issues.	0.2	
2/1/2020	GCG	Email to JB, DK and SY re same.	0.1	
2/1/2020	GCG	Review defendant's discovery requests; email coordination co-counsel re same.	0.3	
2/3/2020	GCG	Conf w/ GW and MJ re preparation for call with court.	0.5	
2/3/2020	GCG	Prepare for call.	0.2	
2/3/2020	GCG	Review draft letter from MJ and defendants re meet and confer issues.	0.2	
2/3/2020	BBK	Reviewing Court Orders scheduling telephonic status conference; reviewing M. Johnson draft M&C letter to opposing counsel re RFP Set 4.	0.2	
2/3/2020	JSY	Conf. w/ AX and GCG re order setting telephonic conference.	0.2	
2/3/2020	JSY	Call with class member.	0.1	
2/3/2020	FFV	Set up GCG's court call.	0.4	
2/3/2020	KES	Confer team re email from putative class member.	0.2	
2/4/2020	GCG	Revise GW talking points for court call w/ Judge Gilliam.	0.3	
2/4/2020	GCG	Conf w/ and email GW re same.	0.1	
2/4/2020	GCG	Conf w/ BBK re motion to compel.	0.1	
2/4/2020	GCG	Prepare for and conduct court appearance w/ Judge Gilliam, GW and defendants.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 265

SERVICES

Date	Person	Description of Services	Hours	Discount
2/4/2020	GCG	Revise GW email to JB re conf w/ Judge Beeler.	0.2	
2/4/2020	GCG	Confs w/ BBK and JSY re discovery issues and class cert motion.	0.2	
2/4/2020	GCG	Emails w/ expert GW.	0.2	
2/4/2020	GCG	Work on co-counsel agreement and expert retention; run conflicts check.	0.6	
2/4/2020	BBK	Reviewing M. Johnson-GCG communications in advance of telephonic hearing before Judge Gilliam, including memo of talking points for call.	0.1	
2/4/2020	BBK	Conferring w/ GCG re call w/ Judge Gilliam and next steps for MTC on resident complaints.	0.1	
2/4/2020	JSY	Conf. w/ GCG and BBK re telephonic hearing.	0.1	
2/4/2020	KES	File notice of courtcall appearance.	0.1	
2/4/2020	EH	Reviewed documents produced by defendants and coded for issues on relativity.	1.9	
2/5/2020	GCG	Emails to GW re plan w/ Judge Beeler, Carlson declaration and letter to class members.	0.5	
2/5/2020	GCG	Conf w/ BBK and email to MJ and BBK re meet and confer call.	0.2	
2/5/2020	GCG	Conf w/ JSY re plan for obtaining declarations.	0.4	
2/5/2020	GCG	Email to GW re co-counsel agreement.	0.2	
2/5/2020	GCG	Conf w/ JSY re preparation for oral argument.	0.1	
2/5/2020	BBK	Failed attempts to reach BB by phone re BD's promised update in advance of lead counsel M&C on 2/6.	0.1	
2/5/2020	BBK	Reviewing communications w/ opposing counsel re filing joint statement to MJ Beeler and requesting discovery conference.	0.1	
2/5/2020	BBK	Reviewing M. Johnson 2/4 meet and confer letter.	0.1	
2/5/2020	BBK	Drafting/sending FU email to B. Buffaloe re BD's promised update in advance of lead counsel M&C on 2/6.	0.2	
2/5/2020	BBK	Reviewing B. Buffaloe response to BBK email follow-up and conferring w/ GCG & M. Johnson re this.	0.1	
2/5/2020	BBK	Reviewing GCG draft letter to class representatives w/ case updates.	0.1	
2/5/2020	JSY	Conf. w/ GCG re next steps to prepare for class cert; emails with team re same.	0.6	
2/5/2020	JSY	Multiple conf. w/ GCG and LAE re prep. for oral argument; research re same.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/5/2020	FFV	Save to the DMS ltr re production of documents.	0.2	
2/5/2020	KES	Update electronic files.	0.2	
2/6/2020	GCG	Prepare for and conduct final meet and confer before motion to compel re complaint production.	1.0	
2/6/2020	GCG	Confs w/ and emails to BBK, MJ and GW re same.	0.2	
2/6/2020	GCG	Emails re discovery conference.	0.1	
2/6/2020	GCG	Revise letter to class representatives; email to JSY re same.	0.1	
2/6/2020	GCG	Emails to MJ and defendants re meet and confer.	0.1	
2/6/2020	GCG	Email to TC and team re motion to compel re complaints.	0.1	
2/6/2020	GCG	Email to MJ and defendants re inspections.	0.1	
2/6/2020	BBK	Drafting/sending email response to B. Buffaloe.	0.3	
2/6/2020	BBK	Reviewing M. Johnson FU w/ Defendants re site inspections.	0.1	
2/6/2020	BBK	Preparing talking points and conducting factual research in prep for lead counsel meet and confer on RFPs 2-9.	0.5	
2/6/2020	BBK	Conferring w/ GCG and M. Johnson re plan of attack for meet and confer on RFPs 2-9.	0.5	
2/6/2020	BBK	Conducting lead counsel meet and confer on RFPs 2-9 w/ GCG & M. Johnson.	0.9	
2/6/2020	BBK	Conferring w/ GCG re drafting joint letter brief post-meet and confer on RFPs 2-9.	0.1	
2/6/2020	BBK	Reviewing M. Johnson's request for discovery conference w/ proposed schedule for joint statement to MJ Beeler's chambers.	0.1	
2/6/2020	BBK	Reviewing T. Close/M. Johnson/GCG emails re additional argument to include in joint letter brief.	0.1	
2/6/2020	BBK	Planning/preparing Plaintiffs' portion of joint letter brief on RFPs 2-9.	1.6	
2/6/2020	JSY	Emails re class member letters.	0.1	
2/7/2020	GCG	Review and revise draft joint letter brief re complaints.	0.3	
2/7/2020	GCG	Conf w/ BBK and emails to GW and MJ re same.	0.2	
2/7/2020	GCG	Emails to GW and team re evidence preservation letter.	0.1	
2/7/2020	GCG	Confs w/ and emails to JSY re letters to class representatives and drafting their declarations.	0.3	
2/7/2020	GCG	Review email and court order re discovery conference.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2020	BBK	Conferring w/ JSY re litigation hold/preservation letter.	0.2	
2/7/2020	BBK	Reviewing communications w/ RBGG team re finalizing/sending letters to class reps.	0.1	
2/7/2020	BBK	Team meeting w/ JSY, AX, KES, and EH re declaration plan.	0.5	
2/7/2020	BBK	Drafting Plaintiffs' portion of joint letter brief on dispute over RFP 2-9.	4.2	
2/7/2020	BBK	Conferring w/ GCG re revisions to Plaintiffs' portion of joint letter brief on dispute over RFP 2-9, updating letter accordingly, and sending to co-counsel for review.	0.3	
2/7/2020	BBK	Conducting legal research re potential cases to include in joint letter brief re RFP 2-9.	0.4	
2/7/2020	BBK	Reviewing B. Upierre meet and confer letter sent to Ds re personal service resident assessment data and payroll data.	0.1	
2/7/2020	AX	Team meeting re: drafting named plaintiff declarations and finalizing; discuss ongoing discovery disputes and upcoming hearing and class certification motion timeline; review draft declarations for named plaintiffs.	0.9	
2/7/2020	JSY	Emails re document preservation letter; research same.	0.2	
2/7/2020	JSY	Team meeting re declarations.	0.5	
2/7/2020	JSY	Conf. w/ GCG re declarations for class representatives and class cert. schedule.	0.2	
2/7/2020	JSY	Prepare letters for class representatives; emails with class representatives re declarations.	1.5	
2/7/2020	KES	Calendar hearing.	0.1	
2/7/2020	KES	Email relative of Brookdale resident.	0.1	
2/7/2020	KES	Prepare letters for clients re status of case.	0.4	
2/7/2020	KES	Team meeting re class cert motion tasks.	0.4	
2/7/2020	EH	Weekly conference re case updates, class certification, drafting of declarations for named plaintiffs, etc.	0.6	
2/7/2020	EH	Reviewed and sent outreach letters to named plaintiffs re case updates and declarations.	1.0	
2/8/2020	GCG	Review and revise draft joint letter brief re complaint RFPs.	0.3	
2/8/2020	GCG	Emails to GW and BBK re same; email brief to defendants' counsel.	0.3	
2/8/2020	BBK	Conferring w/ GCG, M. Johnson and G. Wallace re revisions to draft joint letter brief on dispute over RFPs 2-9, and reviewing/approving revised draft.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/10/2020	GCG	Email to GW and KS re financial and insurance experts.	0.2	
2/10/2020	GCG	Confs w/ GW and MJ re joint statement and other discovery issues.	0.3	
2/10/2020	GCG	Review and revise GW draft joint statement re discovery issues and class cert schedule.	0.7	
2/10/2020	GCG	Review and revise co-counseling agreement.	0.4	
2/10/2020	GCG	Revise email from JY and class member.	0.2	
2/10/2020	GCG	Confs w/ and emails to JY re class member declarations.	0.3	
2/10/2020	GCG	Emails to MJ, BB and conf w/ BBK re revised motion to compel schedule.	0.3	
2/10/2020	SJR	Review revised co-counsel agreement; emails with GG.	0.3	
2/10/2020	BBK	Reviewing communications w/ RBGG team re concerns about retaliation raised by putative class member and responding thereto; reviewing Ds' response to M. Johnson email re site inspections.	0.1	
2/10/2020	BBK	Reviewing email report by M. Johnson re hot docs identified from BD productions.	0.1	
2/10/2020	BBK	Reviewing B. Buffaloe request for additional time to draft Ds' portion of joint discovery letter brief on RFPs 2-9 and conferring w/ G. Wallace/GCG re finalizing/filing brief.	0.1	
2/10/2020	BBK	Reviewing JSY report re update from class representative at BD Brookhurst re problems at facility.	0.1	
2/10/2020	BBK	Reviewing G. Wallace draft Plaintiffs' section of joint statement on discovery issues for submission to MJ Beeler and GCG's proposed revisions thereto.	0.2	
2/10/2020	JSY	Emails re response to class member correspondence.	0.1	
2/10/2020	JSY	Draft class representative declarations; t/c with J. Algarme re same; emails re same.	2.6	
2/10/2020	KES	Confer GCG re information for meet and confer re document production.	0.2	
2/10/2020	KES	Review emails with Brookdale residents.	0.1	
2/10/2020	KES	Review potential expert CV.	0.1	
2/11/2020	GCG	Emails to GW, JY and MJ re joint statement, draft class rep declaration and co-counseling agreement.	0.3	
2/11/2020	GCG	Conf w/ JY re call w/ class rep.	0.1	
2/11/2020	BBK	Conferring w/ co-counsel re finalizing/sending Plaintiffs' portion of Joint Discovery Brief to Defendants.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 269

SERVICES

Date	Person	Description of Services	Hours	Discount
2/11/2020	BBK	Reviewing M. Johnson response to Ds re site inspections & comm'ns to prospective Cms re retaliation concerns.	0.1	
2/11/2020	AX	Begin review third amended complaint sections for declarations; review Algarme declaration and confer w/ KS; start on draft declaration for named plaintiff.	1.3	
2/11/2020	JSY	Emails with class member.	0.1	
2/11/2020	JSY	Draft class rep. declarations; t/c re same.	1.5	
2/11/2020	KES	Review declaration template.	0.1	
2/12/2020	GCG	Emails to GW, MJ and BBK re defendants' section of joint letter brief.	0.3	
2/12/2020	GCG	Conf w/ BBK and KES re same.	0.3	
2/12/2020	GCG	Email BB re same.	0.1	
2/12/2020	GCG	Review and analyze defendants' section; emails to team re same.	0.6	
2/12/2020	GCG	Conf w/ AX re legal research.	0.2	
2/12/2020	BBK	Conferring w/ GCG re plan for revising/filing Joint Letter Brief upon receipt of Ds' portion.	0.2	
2/12/2020	BBK	Conferring w/ KES re preparing Ex A to joint ltr brief containing Discovery Requests and Responses.	0.2	
2/12/2020	BBK	Reviewing M. Johnson/opposing counsel emails re Ds' request for additional time to prepare portion of joint Discovery Statement.	0.1	
2/12/2020	BBK	Comm. to B. Buffaloe re outstanding Ds' portion of joint discovery brief on RFPs 2-9.	0.1	
2/12/2020	BBK	Conferring w/ GCG / G. Wallace / M. Johnson re Ds' portion of joint letter brief.	0.2	
2/12/2020	KES	Review and gather documents produced by Defs in connection with letter brief re doc production.	0.4	
2/12/2020	KES	Email with co-counsel re legal memo.	0.1	
2/12/2020	KES	Review document for exhibit to letter brief and confer BBK re same.	0.4	
2/12/2020	KES	Draft declaration of Bernie Jestrabek-Hart for class cert motion.	2.5	
2/13/2020	GCG	Emails to JY and team re declarations ISO class cert., letter from SG and Defendants, and insurance issues.	0.3	
2/13/2020	GCG	Emails to GW, MJ and BBK re joint statement revisions and filing.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/13/2020	BBK	Conferring w/ team re logistics for finalizing/filing joint discovery ltr brief on RFP 2-9.	0.3	
2/13/2020	BBK	Planning/drafting revisions to Plaintiffs' portion of joint discovery ltr brief on RFP 2-9 in response to Ds' position (including reviewing/assessing Ds' portion of brief and declaration).	2.5	
2/13/2020	BBK	Conferring w/ G. Wallace, M. Johnson and GCG re revisions to Plaintiffs' portion of joint discovery ltr brief on RFP 2-9 and revising same.	0.7	
2/13/2020	BBK	Conferring by email w/ opposing counsel re redlined joint letter brief on RFPs 2-9.	0.2	
2/13/2020	BBK	Reviewing additional footnotes added to Ds' portion of joint letter brief on RFPs 2-9 and conferring w/ co-counsel re same.	0.2	
2/13/2020	BBK	Finalize letter brief.	0.3	
2/13/2020	BBK	Calling and leaving voicemails w/ J. Kopczynksi and B. Buffaloe re joint letter brief on RFPs 2-9.	0.1	
2/13/2020	BBK	Attending to finalizing/filing joint letter brief of RFPs 2-9.	0.4	
2/13/2020	BBK	Conferring w/ GM and EH re letter from family member of former BD Fountaingrove resident to BD CEO raising complaints in Jan 2017.	0.2	
2/13/2020	BBK	Reviewing JSY update re recent contacts w/ putative class representatives; reviewing JSY update re call w/ K. Stebner and B. Umpierre.	0.1	
2/13/2020	BBK	Reviewing JSY update re call w/ M. Johnson & G. Wallace re plan for depositions and class declarations.	0.1	
2/13/2020	AX	Review Algarme declaration and TAC (.3); draft declaration for Rita Stiner/Stacia Stiner (2.5); discuss questions with JY, including issues with damages calculations (.4); discuss declarations with KS (.2); email cocounsel for Stacia Stiner's contact info (.1); review correspondence re: discovery disputes (.3).	3.8	
2/13/2020	JSY	Emails and calls re insurance coverage issue and related claims.	0.5	
2/13/2020	JSY	T/C with MTJ and GW re case tasks and depositions; emails with team re same.	0.5	
2/13/2020	JSY	Draft and edit class rep. declarations; emails re same.	2.1	
2/13/2020	FFV	Save faxed doc to the DMS.	0.2	
2/13/2020	KES	Prepare exhibit, finalize and file Discovery Letter Brief.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/13/2020	KES	Online research regarding cases filed against Brookdale prior to 2017.	1.8	
2/13/2020	KES	Revise draft declaration for Bernie Jestrabek-Hart.	1.0	
2/13/2020	EH	Corresponded with Sandy Grant re 2017 letter to Brookdale CEO from Fountaingrove Family Council.	0.7	
2/13/2020	EH	Reviewed and drafted declaration re named plaintiff for class cert motion.	4.9	
2/14/2020	BBK	Reviewing M. Johnson report re planned service of deposition notices; reviewing M. Johnson draft letter re over breadth of BD's production of non-responsive docs.	0.1	
2/14/2020	BBK	Reviewing KES update re new information from class representation; reviewing communications w/ RBGG team re class rep declarations for class cert motion.	0.1	
2/14/2020	AX	Confer w/ JY via email re: named plaintiffs.	0.2	
2/14/2020	AX	Revise declaration for Stacia Stiner.	0.8	
2/14/2020	AX	Draft and revise declaration for Loresia Vallette.	2.3	
2/14/2020	AX	Review other draft declarations.	0.2	
2/14/2020	JSY	Review and edit depo notices for EDs; emails re same.	0.3	
2/14/2020	JSY	Review and revise class member declarations; emails re same.	1.2	
2/14/2020	KES	Revise declaration of Bernie Jestrabek-Hart and telephone conference with client re same.	2.7	
2/14/2020	KES	Review research results re pre-2016 suits against Brookdale.	0.3	
2/14/2020	EH	Incorporated edits into draft declaration for named plaintiff re conditions at Brookdale Scotts Valley Facility.	1.0	
2/16/2020	GCG	Review MJ letter to defendants re production of hard copy and generic documents; email to MJ re same.	0.1	
2/17/2020	GCG	Review JY emails re deposition.	0.1	
2/17/2020	GCG	Review MJ letter re discovery issues.	0.1	
2/17/2020	GCG	Email to GW and MJ re schedule.	0.1	
2/17/2020	GCG	Email to JB re reports and inspections.	0.1	
2/18/2020	GCG	Review defendants' section of joint statement re class cert schedule and discovery disputes.	0.4	
2/18/2020	GCG	Conf w/ and email to MJ and GW re same and re meet and confer call.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/18/2020	GCG	Emails to BB and JK re discovery meet and confer and inspections.	0.1	
2/18/2020	GCG	Conf w/ JSY and email to AX re class member declarations.	0.1	
2/18/2020	BBK	Conferring w/ GCG, AX, and JSY re staffing of 2/19 meet and confer call w/ Ds.	0.1	
2/18/2020	AX	Review JY edits to Stacia Stiner declaration.	0.3	
2/18/2020	AX	Schedule and speak to Stacia Stiner re: experiences at Brookdale San Ramon to update her declaration.	1.5	
2/18/2020	AX	Introduction to Rita Stiner and schedule time to talk about declaration.	0.2	
2/18/2020	AX	Revise Stacia Stiner's declaration.	0.3	
2/18/2020	JSY	Conf. w/ KS re notice of related claims for insurance coverage.	0.3	
2/18/2020	JSY	Edit class rep. declarations; conf. w/ GCG re same; conf. w/ KES re same.	1.9	
2/18/2020	JSY	Review briefs.	2.1	
2/18/2020	KES	Update electronic files.	0.1	
2/18/2020	KES	Review and organize research re lawsuits against Brookdale and confer JY re same.	0.7	
2/19/2020	GCG	Emails to JSY re legal research for oral argument and moot court.	0.2	
2/19/2020	LAE	Conf with JSY re appellate prep and strategy.	0.4	
2/19/2020	LAE	Emails with JSY re setting up moot.	0.1	
2/19/2020	JSY	Prepare for oral argument; research for 28(j) letter.	3.6	
2/20/2020	GCG	Review and revise joint statement re need for additional time for class cert.	0.4	
2/20/2020	GCG	Emails to GW and MJ re same and need to move to compel.	0.2	
2/20/2020	BBK	Reviewing M. Johnson draft email to opposing counsel memorializing 2/19 meet and confer call on 2/3, 2/5 and 2/7 M&C letters and communications w/ co-counsel re revisions thereto.	0.1	
2/20/2020	BBK	Reviewing draft Joint Discovery Statement sent by G. Wallace to opposing counsel w/ Defendants' position and Plaintiffs' responses thereto added.	0.4	
2/20/2020	JSY	Prepare for oral argument; research re 28(j) letter.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2020	KES	Revise declaration of Bernie Jestrabek-Hart; review additional client docs re same.	1.4	
2/21/2020	GCG	Emails to GW re Brookdale 10-K and finalization of joint statement.	0.1	
2/21/2020	GCG	Conf w/ JSY, KES and EH re decl drafting and document review.	0.1	
2/21/2020	AX	Phone call with Rita Stiner to discuss declarations and updates re: Brookdale.	0.7	
2/21/2020	JSY	Research for 28(j) letter.	1.5	
2/21/2020	JSY	Conf. w/ team re declarations from class representatives.	0.2	
2/21/2020	JSY	Conf. w/ GCG re subpoenas.	0.1	
2/21/2020	KES	Download and circulate pleadings.	0.3	
2/24/2020	GCG	Email to MJ re document production issues.	0.2	
2/24/2020	GCG	Review JK declaration and JT statement in preparation for magistrate judge hearing.	0.4	
2/24/2020	GCG	Email to GW re same.	0.1	
2/24/2020	BBK	Reviewing M. Johnson's 2/21 meet and confer letter to opposing counsel and 2/21 email requesting update on Ds' planned productions ILO of Ds' representations in the Joint Discovery Statement to MJ Beeler.	0.1	
2/25/2020	GCG	Review pleadings and letters to prepare for hearing before MJ Beeler.	0.2	
2/25/2020	GCG	Emails to GW and MJ re same.	0.1	
2/25/2020	BBK	reviewing communications between GCG and co-counsel re need to FU w/ Defendants re production of "complaint database".	0.1	
2/26/2020	GCG	Conf w/ and email to GW and email from MJ re preparation for hearing before MJ Beeler.	0.2	
2/26/2020	BBK	Reviewing M. Johnson's overview of status of major discovery disputes in preparation for 2/27 discovery hearings before MJ Beeler.	0.1	
2/26/2020	BBK	Reviewing communications between co-counsel and opposing counsel re scheduling of meet and confer w/ lead counsel ASAP on key dispute re data needed for staffing expert.	0.1	
2/26/2020	AX	Draft, revise, and send memo re: class damages and community fees.	2.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2020	GCG	Review discovery statement and complaint motion to compel; prepare for hearing.	0.4	
2/27/2020	GCG	Attend discovery conference before MJ Beeler; confs w/ co-counsel re same and re next steps.	3.5	
2/27/2020	GCG	(Reduced Charge) Travel to court - office.	0.2	0.2
2/27/2020	GCG	Confs w/ JSY and AX re same.	0.2	
2/27/2020	BBK	Conferring w/ GCG re Plaintiffs' proposed compromise on discovery dispute over complaints in prep for discovery hearing B4 MJ Beeler.	0.1	
2/27/2020	BBK	Reviewing minute order and G. Wallace update re discovery hearing B4 MJ Beeler; conferring w/ JSY re discovery hearing and class rep declarations.	0.1	
2/27/2020	AX	Draft, revise, and send memo re: class damages and community fees.	2.1	
2/27/2020	AX	Research client files for residency agreements.	0.5	
2/28/2020	GCG	Review MJ discovery order.	0.1	
2/28/2020	GCG	Attend to discovery served on plaintiffs.	0.1	
2/28/2020	GCG	Team meeting to discuss decl, client interactions and motion for class cert.	0.5	
2/28/2020	GCG	Review email from defendants canceling meet and confer.	0.1	
2/28/2020	AX	Team meeting to discuss discovery hearing and case strategy.	0.6	
2/28/2020	AX	Review and revise draft declarations.	0.7	
2/28/2020	KES	Meet regarding case status.	0.3	
2/28/2020	EH	Weekly conference re case issues and updates.	0.5	
3/2/2020	BBK	Reviewing emails between opposing counsel and M. Johnson canceling lead counsel M&C on dispute over data needed by staffing experts (including co-counsel comm'ns re this); reviewing M. Johnson follow-up email to opposing counsel re production of complaints database in usable form.	0.1	
3/2/2020	BBK	Reviewing discovery order entered by MJ Beeler on dispute over production of complaints and need to extend class cert schedule in light of discovery status.	0.1	
3/2/2020	EH	Saved to file Defendants discovery requests.	0.3	
3/2/2020	EH	Saved to file order re discovery hearing and circulated to team.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 275

SERVICES

Date	Person	Description of Services	Hours	Discount
3/3/2020	GCG	Emails to JY and MJ re responding to discovery served by defendants.	0.1	
3/3/2020	GCG	Emails re new appearance in 9th Cir filed by defendants.	0.1	
3/3/2020	GCG	Email to GW and team re stip and proposed order re class cert schedule.	0.1	
3/3/2020	LAE	Emails with JY re notice re new appellate lawyer for argument, strategy issues.	0.1	
3/3/2020	BBK	Conferring w/ JSY, AX, and co-counsel re scheduling call to plan response to Defendants' discovery requests.	0.1	
3/3/2020	JSY	Emails re stipulation for extension and discovery responses.	0.3	
3/3/2020	JSY	Emails re new counsel for appeal.	0.2	
3/3/2020	KES	Download and circulate pleading.	0.1	
3/3/2020	KES	Review emails re discovery.	0.1	
3/4/2020	BBK	Reviewing M. Johnson FU w/ opposing counsel re whether they will produce complaints database as they promised and failure of our reasonable efforts to M&C over docs needed for staffing expert in light of repeated delays and inability to come to M&Cs w/ info necessary to engage in M&C process.	0.1	
3/4/2020	JSY	Emails re oral argument.	0.1	
3/5/2020	BBK	Reviewing/commenting on M. Johnson's draft of plaintiffs' portion of Joint Discovery Letter Brief on Defendants' refusal to negotiate on ESI discovery.	0.2	
3/5/2020	BBK	Reviewing/commenting on M. Johnson's draft of plaintiffs' portion of Joint Discovery Letter Brief on impasse over documents sought through discovery for staffing expert.	0.2	
3/6/2020	LAE	Emails with JSY re RJN ruling.	0.1	
3/6/2020	BBK	Reviewing RFPs and Interrogatories served by Defendants on putative class reps in prep for conference call w/ co-counsel.	0.3	
3/6/2020	BBK	Conference call w/ co-counsel and JSY/AX re plan of attack for responding to defendants' discovery requests.	0.5	
3/6/2020	BBK	Reviewing JSY emails to putative class reps re responding to Defendants' discovery requests; JSY-KES communications re ensuring all client docs we have are uploaded to Relativity for production.	0.1	
3/6/2020	BBK	Analyzing M. Johnson's spreadsheet on which of Plaintiffs' RFPs require ESI searches and search terms for inclusion in joint discovery brief (including review of B. Umpierre comments thereon); drafting/sending BBK additional comments.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 276

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2020	BBK	Reviewing filed stipulation on class certification briefing schedule to update Judge Gilliam following discovery hearing before MJ Beeler.	0.1	
3/6/2020	AX	Phone conference with cocounsel to discuss plaintiffs' responses to discovery; draft and finalize notes re: the same.	1.2	
3/6/2020	JSY	Emails re order on RJN.	0.1	
3/6/2020	JSY	Call re discovery requests from clients; emails re same.	1.6	
3/6/2020	KES	Download and circulate pleading.	0.1	
3/6/2020	EH	Reviewed documents produced for defendants on relativity and coded for issues related to class cert.	1.2	
3/9/2020	LAE	Emails with JSY re strategy re prep for argument.	0.1	
3/9/2020	BBK	Reviewing/comments on M. Johnson's proposed reply to mischaracterizations in J. Kopczynski email re production of complaints database.	0.1	
3/9/2020	BBK	Reviewing communications w/ co-counsel re draft class rep declarations & responding to unsolicited contact from former ED of BD Scotts Valley.	0.1	
3/9/2020	BBK	Reviewing Plaintiffs' draft joint discovery letter brief re impasse over production of residency agreements.	0.1	
3/9/2020	JSY	Emails re class rep declarations; edit same; emails re contact with former EDs.	0.5	
3/9/2020	JSY	Prep. for oral argument.	3.4	
3/9/2020	KES	Review and organize new client documents.	0.4	
3/9/2020	EH	Circulated email to team re possible outreach to former executive director at Brookdale Scotts Valley facility.	0.2	
3/10/2020	LAE	Initial prep for moot, emails and conf with JSY re 9th Cir policy re covid 19 and related procedural issues.	0.5	
3/10/2020	BBK	Reviewing Order Granting Stipulated EOT to file class cert motion and setting briefing and hearing schedule.	0.1	
3/10/2020	BBK	Reviewing JSY report re call w/ former ED of Brookdale Scotts Valley confirming many allegations in complaint re systemic understaffing.	0.1	
3/10/2020	BBK	Reviewing emails between opposing counsel and G. Wallace/M. Johnson.	0.1	
3/10/2020	JSY	Emails re declarations.	0.1	
3/10/2020	JSY	T/C with Former ED PH; draft memo re same.	1.0	
3/10/2020	JSY	Prep for oral argument.	2.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/10/2020	KES	Review court order and calendar new deadlines re same.	0.3	
3/11/2020	GCG	Review emails to MJ and defendants re discovery disputes.	0.1	
3/11/2020	BBK	Reviewing communications between M. Johnson and opposing counsel re joint discovery letter briefs on production of docs needed for staffing experts and ESI.	0.5	
3/11/2020	BBK	Reviewing draft Plaintiffs' portion of joint discovery letter brief sent by T. Close to opposing counsel re impasse re Interrogatory seeking identification of Brookdale residents w/ disabilities.	0.1	
3/11/2020	AX	Draft Rita Stiner declaration based on updated client documents and client interview notes.	2.4	
3/11/2020	JSY	Prep for oral argument.	2.3	
3/11/2020	KES	Download and circulate filed briefing.	0.2	
3/11/2020	KES	Review and organize new client documents and review status of upload to Relativity.	0.7	
3/11/2020	EH	Reviewed document production produced by defendants and coded for relevant information re class cert.	3.0	
3/12/2020	GCG	Review and analyze AX memo re potential damages and bases for same; email to AX re same.	0.3	
3/12/2020	GCG	Review emails to KJ, MJ, GW and experts re experts.	0.1	
3/12/2020	GCG	Review AX email re conversation w/named plaintiff and draft decl.	0.1	
3/12/2020	LAE	Emails and conf with JSY re clerk notification re status of argument, procedure.	0.2	
3/12/2020	BBK	Reviewing AX update re conferring w/ class rep re declaration; reviewing e-notices of filings of two joint discovery letter briefs.	0.1	
3/12/2020	AX	Draft Rita Stiner declaration.	1.4	
3/12/2020	AX	Phone call with Rita Stiner re: declaration, recent billing statements from Brookdale, reluctance to care charges, and potential depositions.	1.1	
3/12/2020	AX	Draft email summary to team.	0.2	
3/12/2020	AX	Email correspondence with GCG re: damages memo and residency agreement.	0.1	
3/12/2020	AX	Confer with KS re: residency agreement provided by Defendants.	0.1	
3/12/2020	AX	Review residency agreement.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2020	JSY	Prep for argument.	5.0	
3/12/2020	KES	Download and organize cases for oral argument prep.	1.3	
3/12/2020	KES	Download and circulate discovery letter brief.	0.2	
3/12/2020	KES	Gather client document and confer AX re same.	0.2	
3/13/2020	GCG	Team meeting re class rep. declarations and document review.	0.3	
3/13/2020	GCG	Email to MJ and JK re document production.	0.1	
3/13/2020	GCG	Conf w/ JSY re preparation for oral argument.	0.2	
3/13/2020	BBK	RBGG team meeting re case tasks and status.	0.3	
3/13/2020	BBK	Reviewing email communications between M. Johnson and opposing counsel re document production.	0.1	
3/13/2020	AX	Phone call with Rita Stiner re: conversation with Sean Cull, ED of Brookdale San Ramon.	0.2	
3/13/2020	AX	Revise Rita Stiner declaration based on updated documentation.	2.5	
3/13/2020	AX	Review email communication from cocounsel re: discovery.	0.2	
3/13/2020	JSY	Prep for argument/ moot.	5.0	
3/13/2020	KES	Revise shift report doc type analysis memo.	0.7	
3/13/2020	KES	Review status of document production.	0.2	
3/14/2020	GCG	Emails to JSY re moot.	0.1	
3/14/2020	LAE	Emails re moot and logistics for virtual attendance.	0.2	
3/14/2020	JSY	Prepare for moot/argument.	4.5	
3/15/2020	GCG	Review brief and prior orders to prepare for moot.	0.9	
3/15/2020	GCG	Emails to JSY re same.	0.1	
3/15/2020	LAE	Review materials in prep for JSY moot.	1.6	
3/15/2020	LAE	Call and texts with JSY re argument prep strategy.	0.3	
3/15/2020	LAE	Confs and texts with JSY re argument prep and Covid 19 impact.	0.2	
3/15/2020	JSY	Prepare for moot/argument.	3.0	
3/16/2020	GCG	Prepare for and conduct moot of oral argument with JSY, LAE and SH.	1.5	
3/16/2020	GCG	Follow up emails with team regarding same and regarding court's cancellation of argument.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/16/2020	LAE	Locate 9th Cir panel for JSY argument and emails re same, brief research re same.	0.3	
3/16/2020	LAE	Review materials in prep for moot of JSY, moot JSY with GCG and B Hattem.	5.3	
3/16/2020	LAE	Emails with GG, JSY and cocounsel re cancellation of argument and discussion re panel.	0.1	
3/16/2020	BBK	Conferring w MJonhson & EH re next steps for review/analysis of complaints database and assessing whether further production required.	0.1	
3/16/2020	BBK	Reviewing court order denying w/o prejudice two letter briefs.	0.1	
3/16/2020	BBK	(Billing Judgment) Reviewing 9th Cir Order re no oral argument needed for appeal; reviewing commons w GCG,JSY and co-counsel re panel.	0.0	0.1
3/16/2020	JSY	Prepare for moot and conduct moot of argument.	5.2	
3/16/2020	KES	Retrieve and review complaints.	2.0	
3/17/2020	GCG	Email BH re moot and argument.	0.1	
3/17/2020	GCG	Email GW and MJ regarding status and call.	0.1	
3/17/2020	BBK	Reviewing MJohnson FU w opposing counsel.	0.1	
3/18/2020	GCG	Emails to GW re call to discuss status.	0.1	
3/18/2020	GCG	Review and respond to email from new counsel for defendants.	0.1	
3/18/2020	GCG	Run conflicts check and update contacts.	0.1	
3/18/2020	BBK	Reviewing outreach from Brookdale's new counsel notifying Plaintiffs of substitution of counsel for OMM and conferring w/ co-counsel re this.	0.1	
3/18/2020	JSY	Emails re new counsel.	0.1	
3/19/2020	GCG	Oversee conflicts check for new counsel; update case contacts.	0.2	
3/19/2020	GCG	Emails to MJ and re call to discuss pending discovery issues.	0.2	
3/19/2020	GCG	Review communications re use of and follow up to complaint data.	0.1	
3/19/2020	GCG	Review Substitution of Counsel.	0.1	
3/19/2020	BBK	Reviewing Notice of Substitution of Counsel filed by BD's new law firm and communications re running conflicts checks on new lawyers.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2020	BBK	Reviewing M. Johnson follow-up w/ BD's new attorneys re priority key discovery issues.	0.1	
3/19/2020	BBK	Reviewing KES report re complaints documents produced by BD and conferring w/ her re analysis/review thereof and access to complaints database produced by BD.	0.2	
3/19/2020	AX	Research Brookdale new opposing counsel for memo to circulate to team.	1.6	
3/19/2020	KES	Download and circulate pleading.	0.1	
3/19/2020	KES	Review complaints database spreadsheets, create CaseMap case and analyze.	3.5	
3/20/2020	GCG	Conf w/ and emails to GW re class cert. motion and strategy; discovery issues.	0.4	
3/20/2020	GCG	Emails to AX and team are legal research and drafting class cert. declarations.	0.2	
3/20/2020	GCG	Review discovery motions to prepare for call w/ opposing counsel.	0.5	
3/20/2020	GCG	Research new opposing counsel.	0.2	
3/20/2020	BBK	Reviewing AX memo re BD's new defense team.	0.1	
3/20/2020	BBK	Emails re case tasks.	0.2	
3/20/2020	BBK	Conferring w/ RBGG team re status of request for EOT for responding to discovery and class rep decls.	0.1	
3/20/2020	AX	Finalize and circulate memorandum with research about new opposing counsel.	0.8	
3/20/2020	AX	Email correspondence with team regarding deadlines for declarations and research memo on class damages.	0.2	
3/20/2020	AX	Review memo on class damages and section on residency agreements.	0.2	
3/20/2020	JSY	Emails re class member declarations.	0.2	
3/20/2020	KES	Download and circulate pleadings.	0.1	
3/20/2020	KES	Review complaints database.	1.5	
3/20/2020	KES	Review and follow up re status of client declaration.	0.2	
3/23/2020	GCG	Email to EH re PL declaration.	0.1	
3/23/2020	GCG	Email to MJ and GM re extension on plaintiffs' discovery responses.	0.1	
3/23/2020	GCG	(Billing Judgment) Attend to expert bill.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/23/2020	BBK	Conferring w/ KES and EH re plan of attack and goals for conducting analysis of complaints made to Brookdale.	0.4	
3/23/2020	BBK	Reviewing M. Johnson communications w/ new opposing counsel requesting extension of time.	0.1	
3/23/2020	BBK	Reviewing updates from RBGG team re status of class rep declarations.	0.1	
3/23/2020	AX	Draft Rita Stiner declaration.	2.2	
3/23/2020	JSY	Edit BJH declaration; emails with team re same.	0.6	
3/23/2020	KES	Review memos re analysis of prior complaints production and review in conjunction with new production; update CaseMap re same; create new version of spreadsheet for follow up class member contact re same.	2.5	
3/23/2020	EH	Conducted call with named plaintiff re declaration in support of motion for class certification.	1.5	
3/23/2020	EH	Incorporated edits from call with named Plaintiff re declaration in support of motion for class cert.	1.0	
3/24/2020	GCG	Review court orders and discovery briefs in preparation for call w/ co-counsel.	0.5	
3/24/2020	GCG	Participate in call w/ co-counsel and defendants' counsel re multiple discovery issues.	1.0	
3/24/2020	GCG	Follow up call w/ GW and MJ to plan next steps.	0.3	
3/24/2020	GCG	Conf w/ AX re revisions to class rep declaration and damages memo.	0.3	
3/24/2020	GCG	Email to GW and team re San Pablo issue.	0.2	
3/24/2020	BBK	Planning draft class rep declaration by H. Fisher (including reviewing exemplars for other class reps).	1.1	
3/24/2020	AX	Review JY's edits to Rita Stiner declaration and email correspondence re: the same.	0.2	
3/24/2020	AX	Make edits to Rita Stiner declaration.	0.4	
3/24/2020	AX	Phone call w/ GCG re: damages memo.	0.3	
3/24/2020	AX	Revise damages memo and distribute to team.	1.6	
3/24/2020	JSY	Edit RS declaration; emails with team re same.	0.5	
3/24/2020	JSY	Emails re M+C call with new opposing counsel.	0.1	
3/24/2020	KES	Review of complaints and update spreadsheet re potential follow up candidates.	4.0	
3/24/2020	KES	Update electronic pleadings files.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/24/2020	EH	Finalized draft of declaration for named Plaintiff in support of motion for class cert and circulated same.	2.5	
3/25/2020	GCG	Email to JSY and EH re class rep declaration.	0.1	
3/25/2020	GCG	Begin reviewing revised AX memo re damages.	0.1	
3/25/2020	JSY	Edit Lindstrom declaration; emails re same.	0.6	
3/25/2020	KES	Continue review and analysis of complaints in connection with possible follow up.	1.3	
3/26/2020	GCG	Review emails from JM re discovery delays.	0.1	
3/26/2020	GCG	Email to EH and JSY re revisions to class member declaration.	0.1	
3/26/2020	BBK	Reviewing communications w/ new opposing counsel Maatman re discovery issues.	0.1	
3/26/2020	KES	Continue review and analysis of Brookdale complaint PDFs.	4.2	
3/26/2020	EH	Incorporated edits for draft declaration of named Plaintiff in support of motion for class cert.	1.0	
3/27/2020	GCG	Attend to expert review.	0.1	
3/27/2020	GCG	Email to team re damages memo.	0.1	
3/27/2020	GCG	Review and revise same.	0.2	
3/27/2020	GCG	Prepare for and conduct team meeting re responses to discovery responses, class rep declarations and complaint database.	0.7	
3/27/2020	BBK	Preparing for RBGG team meeting on priorities and tasks.	0.2	
3/27/2020	BBK	Meeting w/ RBGG team re case tasks.	0.8	
3/27/2020	BBK	Reviewing KES updates re status of her analysis of complaints.	0.1	
3/27/2020	BBK	Reviewing/revising M. Johnson draft ROG response template.	0.5	
3/27/2020	AX	Team strategy conference, including discussion of progress on discovery tasks, drafting declarations.	0.8	
3/27/2020	AX	Draft and revise Stacia Stiner's declaration.	2.4	
3/27/2020	JSY	Team meeting.	0.5	
3/27/2020	KES	Review and analyze complaints spreadsheet and potential follow up calls.	0.4	
3/27/2020	KES	Team conference call re class cert declarations, discovery status and other case issues.	0.8	
3/27/2020	KES	Download and circulate pleadings.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/27/2020	EH	Weekly check-in meeting re draft declaration, RFPS, etc.	0.5	
3/30/2020	BBK	Reviewing AX memo re community fees and damages available under legal theories of liability alleged in TAC.	0.2	
3/30/2020	BBK	Reviewing/revising M. Johnson draft template for Interrogatory objections/responses.	0.6	
3/30/2020	BBK	Reviewing M. Johnson follow-up email sending out draft template for RFP objections/responses.	0.1	
3/30/2020	KES	Continue review and analysis of Brookdale complaints.	3.0	
3/31/2020	GCG	Conf w/ BBK re plaintiffs' discovery responses.	0.2	
3/31/2020	GCG	Conf w/ EH re declarations.	0.1	
3/31/2020	BBK	Conferring w/ M. Johnson re draft discovery response templates.	0.1	
3/31/2020	BBK	Reviewing/drafting proposed revisions and additions to draft Interrogatory Response template (including answers and objections).	3.3	
3/31/2020	AX	Email w/ EH re: drafting declaration.	0.1	
3/31/2020	AX	Communication w/ Stacia Stiner re: Brookdale San Ramon.	0.1	
4/1/2020	BBK	Reviewing S. Colby report re Department of Labor guidance re assisted living employees qualifying as health care employees for purpose of Family First Coronavirus Response Act.	0.1	
4/1/2020	BBK	Reviewing/revising M. Johnson draft RFP responses.	2.1	
4/1/2020	AX	Draft and revise Stacia Stiner declaration and circulate to team.	1.5	
4/1/2020	KES	Review and analyze Brookdale complaints and update chart re possible follow up.	3.7	
4/2/2020	GCG	Emails to MJ and GM re meet and confer call.	0.1	
4/2/2020	GCG	Email to MJ and BBK re same.	0.1	
4/2/2020	BBK	Reviewing M. Johnson email to opposing counsel re meet and confer.	0.4	
4/2/2020	BBK	Reviewing opposing counsel response to M. Johnson request to schedule meet and confer date.	0.1	
4/2/2020	BBK	Reviewing/revising draft responses to RFPs and drafting email to team re this.	1.8	
4/2/2020	KES	Continue review and analysis of Brookdale complaints.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/3/2020	BBK	Conferring w/ KES re status and plan of attack for complaints analysis.	0.1	
4/3/2020	BBK	Reviewing S. Colby's redlines and comments on template of RFP response w/ BBK comments.	0.3	
4/3/2020	KES	Continue review and analysis of Brookdale complaint PDFs.	1.3	
4/6/2020	GCG	Review and analyze communications w/ GM and MJ re outstanding discovery issues and meed and confer.	0.1	
4/6/2020	GCG	Review MJ outline for call w/ defendants.	0.1	
4/6/2020	GCG	Email to GW re expert retention issues.	0.1	
4/6/2020	BBK	Reviewing M. Johnson proposed agenda for 4/7 meet and confer w/ opposing counsel.	0.1	
4/6/2020	BBK	Reviewing complaints spreadsheet and comments thereon to assess scope of production and plan for analysis.	0.2	
4/6/2020	BBK	Reviewing S. Colby's comments and proposed revisions to draft Interrogatories by M. Johnson w/ BBK redlines.	0.7	
4/6/2020	AX	Email correspondence w/ team re: outstanding discovery issues.	0.1	
4/7/2020	GCG	Prepare for and conduct meet and confer w/ defendants' counsel re MJ 16-item checklist of outstanding discovery issues and disputes.	1.9	
4/7/2020	GCG	Follow up email w/ GW and BBK re same.	0.1	
4/7/2020	GCG	Conf w/ JSY and emails to team re class representative declarations.	0.2	
4/7/2020	GCG	Review BJH declaration.	0.2	
4/7/2020	JSY	T/c with GCG re class representative declarations.	0.2	
4/7/2020	JSY	Emails with team re same.	0.1	
4/7/2020	JSY	T/c with AX re same.	0.3	
4/7/2020	BBK	Conferring w/ GCG re discovery meet and confer call w/ opposing counsel.	0.1	
4/7/2020	BBK	Preparing for discovery meet and confer call w/ opposing counsel.	0.2	
4/7/2020	BBK	Discovery meet and confer call w/ opposing counsel (w/ M. Johnson, GCG, and T. Close).	1.8	
4/7/2020	BBK	Conferring w/ co-counsel and GCG by email re next steps after discovery meet and confer call.	0.1	
4/7/2020	BBK	Conferring w/ team re status of class representative declarations.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/7/2020	AX	Correspondence w/ team and phone call w/ JY re: declarations.	0.3	
4/7/2020	EH	Drafted declaration for named plaintiff re motion for class cert.	2.0	
4/8/2020	GCG	Emails to GW, MJ and team re class rep declarations and discovery issues.	0.2	
4/8/2020	JSY	Edit class rep. declarations.	0.5	
4/8/2020	JSY	T/c with JA re same; emails with team re same.	2.0	
4/8/2020	BBK	Drafting/distributing memorandum on 4/7 meet and confer call for team.	1.5	
4/8/2020	BBK	Reviewing team communications re class rep declarations.	0.1	
4/8/2020	BBK	Reviewing M. Jacobsen email re addressing discovery disputes and attached 2 joint discovery letter briefs w/ Ds' positions.	0.3	
4/8/2020	KES	Continue review and analysis of Brookdale complaints.	1.0	
4/9/2020	GCG	Update witness list.	0.1	
4/9/2020	GCG	Prepare for next discovery meet and confer.	0.1	
4/9/2020	GCG	Emails to MJ and team re responses to discovery served on plaintiffs.	0.1	
4/9/2020	GCG	Email to JC and JSY re declaration.	0.1	
4/9/2020	BBK	Conferring w/ M. Johnson and S. Colby re meeting to resolve remaining issues w/r/t responses to RFPs and ROGs.	0.1	
4/9/2020	BBK	Planning/preparing Fisher class rep declaration.	1.1	
4/9/2020	JSY	Draft and edit class representative declarations; emails re same.	1.6	
4/9/2020	KES	Continue review and analysis of Brookdale complaints.	1.0	
4/10/2020	GCG	Prepare for and conduct team meeting re class rep., declarations and discovery.	0.4	
4/10/2020	GCG	Email to AX re putative class member eviction.	0.1	
4/10/2020	BBK	Conferring conferring w/ M. Johnson and S. Colby re call to plan discovery responses.	0.1	
4/10/2020	BBK	RBGG team meeting on case status and immediate tasks.	0.4	
4/10/2020	BBK	Reviewing communications w/ RBGG team re call from putative class member with whom we have been corresponding.	0.1	
4/10/2020	AX	Brookdale weekly strategy meeting, including discussing updates on declarations and discovery.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2020	AX	Telephone conference with Brookdale residents email communication within team re: same.	1.2	
4/10/2020	JSY	Emails re team meeting and class rep. declarations.	0.2	
4/10/2020	JSY	Conf. w/ JC re declaration; edit and send same.	0.5	
4/10/2020	JSY	Emails re eviction notice for class rep.	0.2	
4/10/2020	JSY	Team meeting.	0.5	
4/10/2020	KES	Download and circulate pleadings.	0.2	
4/10/2020	KES	Team meeting re case status, class member declarations, discovery.	0.4	
4/11/2020	GCG	Conf w/ JSY and emails to JSY, GW and team re putative class member.	0.2	
4/11/2020	GCG	Draft response to putative class member.	0.1	
4/11/2020	AX	Review team correspondence re: putative class member.	0.1	
4/11/2020	JSY	Emails and calls re class member issue.	0.3	
4/12/2020	JSY	Emails with class member re issue.	0.1	
4/13/2020	GCG	Conf w/ and email to BBK re conf w/ MH to discuss plaintiffs' discovery and meet and confer call.	0.1	
4/13/2020	GCG	Review GM email report of meet and confer issues.	0.1	
4/13/2020	GCG	Emails to BBK re complaints issue and hearing transcript.	0.1	
4/13/2020	BBK	Conf. re privacy implications of discovery requests seeking social media posts and social media user names and email addresses.	0.5	
4/13/2020	BBK	Planning/preparing proposed strategy/approach for responding to each RFP and ROG served by Ds.	1.8	
4/13/2020	BBK	Strategy call w/ M. Johnson, S. Colby and B. Umpierre to determine our approach and planned responses for ROG and RFP served by Defendants.	1.7	
4/13/2020	BBK	Conferring w/ M. Johnson re plan for 4/14 meet and confer w/ opposing counsel and preparing for call.	0.2	
4/13/2020	BBK	Reviewing opposing counsel's update on certain discovery disputes in advance of 4/14 meet and confer.	0.1	
4/13/2020	BBK	Conferring w/ RBGG Brookdale team re exemplars of interrogatory responses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2020	BBK	Drafting/sending update to GCG re co-counsel strategy call re responding to Defendants' discovery and plan for 4/14 meet and confer call w/ opposing counsel on current discovery disputes.	0.1	
4/13/2020	BBK	Prepare for meet and confer on Ds' search for complaints at individual facilities.	0.2	
4/13/2020	BBK	Conferring w/ team re 2/27 discovery hearing transcript to help prepare for meet and confer on Ds' search for complaints at individual facilities.	0.2	
4/13/2020	JSY	Emails re class member declarations.	0.1	
4/13/2020	EH	Finalized draft declaration for named plaintiff re class cert motion.	1.0	
4/13/2020	EH	Prepare responses to interrogatories from co-counsel.	0.8	
4/14/2020	GCG	Conf w/ BBK re February hearing between Judge Beeler and approach to discovery of complaints.	0.3	
4/14/2020	GCG	Email to MJ and BBK re meet and confer call and next steps.	0.1	
4/14/2020	GCG	Email to JSY and team re class rep declarations.	0.1	
4/14/2020	BBK	Conferring w/ co-counsel and GCG re 2/27 discovery hearing.	0.1	
4/14/2020	BBK	Conferring w/ GCG re plan for today's meet and confer w/ opposing counsel.	0.2	
4/14/2020	BBK	Reviewing/responding to S. Colby re revised ROG Responses.	0.1	
4/14/2020	BBK	Planning/preparing for meet and confer with opposing counsel (including review of full discovery hearing transcript and preparing position on complaints issue).	1.2	
4/14/2020	BBK	Meeting and conferring w/ opposing counsel re all discovery issues (w/ M. Johnson and T. Close).	1.5	
4/14/2020	BBK	Drafting/sending to team memorandum on meet and confer call w/ full notes.	1.2	
4/14/2020	AX	Review BBK's notes from meet and confer call.	0.3	
4/14/2020	AX	Research and draft memo re: settlement amounts and jury verdicts.	2.2	
4/14/2020	JSY	Edit JC declaration; emails re same.	0.8	
4/16/2020	GCG	Review and analyze BBK report on meet and confer call.	0.1	
4/16/2020	GCG	Review client emails re declaration revisions; email JSY re next steps.	0.1	
4/16/2020	GCG	Review KES email re class member outreach.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/16/2020	BBK	Reviewing S. Colby proposal re ROG responses.	0.3	
4/16/2020	BBK	Research issues re ROG responses.	0.2	
4/16/2020	KES	Telephone call and email with relative of Brookdale residents.	0.7	
4/16/2020	KES	Continue review and analysis of Brookdale complaints.	0.8	
4/17/2020	GCG	Prepare for and conduct team meeting re plaintiffs' discovery responses and class rep declarations.	0.7	
4/17/2020	GCG	Outreach to potential witness.	0.3	
4/17/2020	GCG	Draft email to team re review of plaintiffs' interrogatories.	0.3	
4/17/2020	GCG	Review GM emails re residency agreement impasse and production of PSS training materials and delayed production of custodians and search terms.	0.2	
4/17/2020	BBK	Reviewing opposing counsel e-mail confirming impasse on dispute over production of all residency agreements.	0.1	
4/17/2020	BBK	RBGG team meeting on case tasks.	0.4	
4/17/2020	BBK	Conferring re status of each class representative declaration; reviewing GCG follow-up w/ co-counsel.	0.1	
4/17/2020	BBK	Drafting/sending proposal to discovery response team (S. Colby, M. Johnson, B. Umpierre) re ROG responses.	0.2	
4/17/2020	AX	Brookdale team meeting re: case strategy.	0.5	
4/17/2020	AX	Return call to Stacia Stiner.	0.2	
4/17/2020	AX	Draft memo on class action settlements and verdicts.	1.5	
4/17/2020	JSY	Team meeting.	0.5	
4/17/2020	JSY	Conf. w/ GCG re witness declaration.	0.1	
4/17/2020	FGL	Email from/to JSY re revising witness list.	0.1	
4/17/2020	KES	Team meeting re case status, client declarations, discovery.	0.5	
4/17/2020	KES	Complete initial review of Brookdale complaints from 2017 - 2019, determine possible follow up candidates and analyze spreadsheet re same.	1.8	
4/20/2020	BBK	Reviewing M. Johnson response to opposing counsel re impasse on residency agreements dispute.	0.1	
4/20/2020	BBK	Locating most recent communications w/ H. Fisher to identify last contacts.	0.2	
4/20/2020	BBK	Identifying R. Schmidt's DOB and updating draft H. Fisher class rep declaration to include correct age.	0.1	
4/21/2020	GCG	Email to GW re call.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 289

SERVICES

Date	Person	Description of Services	Hours	Discount
4/21/2020	GCG	(Billing Judgment) Research re GM and JR's article on class cert defenses; email to team re same.	0.0	0.3
4/21/2020	BBK	(Billing Judgment) Reviewing Law360 article by opposing counsel re defending class actions and forwarding to team.	0.0	0.2
4/21/2020	BBK	Conferring w/ S. Colby, M. Johnson, B. Umpierre re status of ROG Response revisions.	0.1	
4/21/2020	BBK	Drafting revisions to interrogatory responses.	0.3	
4/21/2020	AX	Phone call with Stacia Stiner.	0.3	
4/22/2020	GCG	Email to JSY and team re draft class representative declarations.	0.1	
4/22/2020	JSY	Finalize class rep. declarations.	0.5	
4/22/2020	BBK	Reviewing M. Johnson communications w/ co-counsel re analysis of KRONOS data production.	0.1	
4/22/2020	BBK	Conferring w M. Johnson re meet and confer on discovery issues w/ opposing counsel on 4/24.	0.1	
4/22/2020	BBK	Drafting revised Interrogatory Responses.	1.6	
4/22/2020	BBK	Updating discovery response team (M. Johnson, S. Colby, B. Umpierre) re status of Rog Response revisions.	0.1	
4/22/2020	AX	(Billing Judgment) Read news stories re: covid in Brookdale Riverwalk.	0.0	0.2
4/22/2020	AX	Read team correspondence re: Kronos data.	0.2	
4/22/2020	AX	Research and draft memo on damages.	1.8	
4/22/2020	KES	Update electronic files.	0.1	
4/22/2020	KES	Review team emails re document and information production issues.	0.1	
4/23/2020	GCG	Email to BBK re meet and confer/discovery issues.	0.1	
4/23/2020	GCG	Conf w/ AX re damages memo.	0.1	
4/23/2020	BBK	Drafting revised Interrogatory Responses and sharing with team.	2.3	
4/23/2020	BBK	Reviewing M. Johnson communications w/ opposing counsel re KRONOS data production, and status of joint letter briefs.	0.1	
4/23/2020	AX	Review class member correspondence.	0.2	
4/23/2020	AX	Emails re: discovery disputes about Kronos data.	0.1	
4/24/2020	GCG	Review and analyze 9th Circuit decision.	0.3	
4/24/2020	GCG	Confs w/ JSY and emails to team re follow up to same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2020	GCG	Emails to GW, MJ and team re discovery issues.	0.1	
4/24/2020	BBK	Conferring w/ S. Colby re status of revised interrogatory responses.	0.1	
4/24/2020	BBK	Reviewing M. Johnson report re meet and confer agenda and preparing for meet and confer.	0.2	
4/24/2020	BBK	Participating in meet and confer w/ opposing counsel w/ M. Johnson and T. Close.	0.8	
4/24/2020	BBK	Drafting/sharing memo re today's meet and confer w/ opposing counsel.	0.6	
4/24/2020	BBK	Drafting/sending email update to H. Fisher re discovery responses and declaration status.	0.2	
4/24/2020	BBK	Reviewing M. Johnson e-mail to team re highlights from today's meet and confer and FU w/ D. Marks re inadequacy of PSS production rec'd today.	0.1	
4/24/2020	BBK	Reviewing 9th Circuit Opinion on BD's appeal of denial of motion to compel arbitration.	0.1	
4/24/2020	BBK	Conferring w/ RBGG team re implications for class of 9th Cir opinion.	0.1	
4/24/2020	AX	Read 9th Circuit order and correspondence with team re: discussion of same.	0.5	
4/24/2020	AX	Research of Unruh Act damages and other issues re: class action settlement.	3.6	
4/24/2020	JSY	Review memorandum dispo.; emails re same.	0.3	
4/24/2020	KES	Review inquiry re Brookdale and consider response re same; email to team re same.	0.2	
4/24/2020	KES	Download, circulate and review judgment.	0.2	
4/26/2020	GCG	Research re impact of Covid-19 on Brookdale and putative class members.	0.2	
4/26/2020	GCG	Emails to MJ and GW re potential stipulation re residency agreements; review same.	0.2	
4/26/2020	AX	Read correspondence from team re: stipulation on discovery disputes.	0.2	
4/27/2020	GCG	Conf w/ and email to BBK re class representatives' discovery responses.	0.2	
4/27/2020	GCG	Review GM custodians and MJ emails re discovery disputes.	0.2	
4/27/2020	BBK	Reviewing M. Johnson draft stipulation re residency agreements.	0.1	
4/27/2020	BBK	Reviewing S. Colby's revisions to Interrogatory Responses.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2020	BBK	Drafting/sending update to discovery response team re discovery issues.	0.3	
4/27/2020	BBK	Conferring w/ M. Johnson re plan for outreach clients in response to BBK's e-mail earlier in the day.	0.3	
4/27/2020	BBK	Reviewing intake from family member of putative class member and KES's proposed response and commenting thereon.	0.2	
4/27/2020	BBK	Reviewing Defendants' proposed list of ESI custodians sent today.	0.1	
4/27/2020	BBK	Preparing H. Fisher draft class rep declaration.	0.7	
4/27/2020	BBK	Conferring w/ GCG re plan for discovery responses and class rep declarations.	0.2	
4/27/2020	AX	Research on Unruh Act damages.	1.8	
4/27/2020	JSY	Emails re declarations.	0.3	
4/27/2020	KES	Email response to inquiry re Brookdale from family of resident.	0.1	
4/28/2020	GCG	Emails to GW, MJ, BBK and team re putative class member declarations, arbitration issues and plaintiffs' discovery responses.	0.2	
4/28/2020	GCG	Review GW proposal emails to HT, SJR and MWB re same.	0.1	
4/28/2020	GCG	Emails to AX and team re implications of 9th cir decision.	0.1	
4/28/2020	SJR	(Billing Judgment) Email and draft response.	0.0	0.2
4/28/2020	BBK	Conferring w/ S. Colby and M. Johnson re discovery responses and status of obtaining declarations from class reps and other class members/family.	0.3	
4/28/2020	BBK	Preparing/researching H. Fisher class rep declaration.	1.9	
4/28/2020	BBK	Conferring w/ AX and RBGG team re class member declarations.	0.2	
4/28/2020	BBK	Conferring w/ AX and RBGG team re import of 9th Circuit opinion on who qualifies for membership in Disability Subclass.	0.1	
4/28/2020	AX	Email correspondence w/ team re: declarations, analysis of 9th cir. opinion.	0.5	
4/28/2020	AX	Research Unruh Act settlement damages and draft memo.	4.8	
4/28/2020	JSY	Emails re class member declarations.	0.1	
4/28/2020	JSY	(Billing Judgment) Draft website update re appeal decision.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
4/28/2020	KES	Review emails re status of class member declarations.	0.1	
4/29/2020	GCG	Email to GW re next call and arbitration issues.	0.1	
4/29/2020	GCG	Email to BBK, AX and team re plaintiffs' discovery responses.	0.1	
4/29/2020	GCG	(Billing Judgment) Emails to SJR and MWB re strategy.	0.0	0.1
4/29/2020	SJR	(Billing Judgment) Emails setting up call; file research.	0.0	0.3
4/29/2020	BBK	Reviewing S. Colby communications re putative class member declarations.	0.3	
4/29/2020	BBK	Reviewing/responding to M. Johnson / S. Colby communications re discovery responses.	0.6	
4/29/2020	BBK	Further communications w/ M. Johnson re plan for completing discovery responses and updating GCG re this.	0.2	
4/29/2020	BBK	Reviewing M. Johnson email forwarding final template interrogatory responses and conferring w/ him re proposed plan.	0.2	
4/29/2020	BBK	Conferring w/ B. Umpierre re discovery responses for H. Fisher (R. Schmidt conservator).	0.2	
4/29/2020	BBK	Reviewing final draft interrogatory response template and making minor revisions thereto.	0.4	
4/29/2020	BBK	Drafting/sending update to full team w/ plan for finalizing discovery responses, assignments for client outreach, and RFP and ROG Response templates.	0.6	
4/29/2020	AX	Email correspondence w/ team re coordinating documents from plaintiffs.	0.3	
4/29/2020	AX	Draft memo detailing recent contacts with Rita and Stacia Stiner in preparing declarations for cocounsel.	1.9	
4/29/2020	AX	Review client documents and share with SW.	0.5	
4/29/2020	KES	Organize new document from class representative for upload to Relativity.	1.0	
4/30/2020	GCG	Conf w/ SJR and MWB re case strategy.	0.6	
4/30/2020	GCG	Emails to GW re same.	0.2	
4/30/2020	GCG	Conf w/ JSY re putative class member declarations.	0.2	
4/30/2020	GCG	Review emails to MJ, expert, MJ and GM re discovery issues.	0.2	
4/30/2020	MWB	(Billing Judgment) Telephone conference with GCG and SJR regarding strategy.	0.0	0.5
4/30/2020	SJR	(Billing Judgment) Prepare for conference call with GG and MWB.	0.0	0.7

SERVICES

Date	Person	Description of Services	Hours	Discount
4/30/2020	BBK	Preparing H. Fisher class rep declaration.	0.8	
4/30/2020	BBK	Reviewing attorney memos re interviews w/ H. Fisher and R. Schmidt.	0.3	
4/30/2020	BBK	Drafting/sending email to B. Umpierre for preparation of discovery responses by H. Fisher.	0.2	
4/30/2020	BBK	Reviewing M. Johnson / G. Maatman communications re Plaintiffs' request for 30-day extension to respond to discovery and FU re Plaintiffs' proposed stipulation re residency agreements.	0.1	
4/30/2020	BBK	Reviewing GCG/KES communications re intake from family member of Brookdale resident re admission of former Brookdale executive re staffing shortages and GCG update re contact w/ potential witness.	0.1	
4/30/2020	JSY	Emails re team meeting.	0.1	
4/30/2020	KES	Review intake re Brookdale and email GCG re same.	0.2	
5/1/2020	GCG	Email to DM and MJ regarding Kronos and other data needed for expert staffing analysis.	0.2	
5/1/2020	GCG	Conf with GW regarding overall strategy and class cert motion, class member declarations and expert work.	0.6	
5/1/2020	GCG	Conf with BBK, JSY, AX, EH and KES regarding plaintiffs' discovery responses and declarations.	0.5	
5/1/2020	GCG	Research issues raised by individual plaintiffs.	0.2	
5/1/2020	GCG	Emails to SJR and MWB regarding expert witness issues.	0.2	
5/1/2020	GCG	Review and analyze MJ memo on remaining discovery issues and email MJ regarding motions to compel; email MJ regarding same.	0.2	
5/1/2020	SJR	(Billing Judgment) Emails regarding status.	0.0	0.2
5/1/2020	BBK	Reviewing M. Johnson communications with D. Marks regarding data needed from Brookdale for staffing experts and limitations on what we have received.	0.1	
5/1/2020	BBK	Reviewing M. Johnson meet & confer email to opposing counsel regarding problems with production of PSS data.	0.1	
5/1/2020	BBK	RBGG team meeting regarding case strategy and tasks.	0.6	
5/1/2020	BBK	(Billing Judgment) reviewing communications with team regarding recently filed lawsuit against Brookdale with similar allegations in MD Tennessee.	0.0	0.1
5/1/2020	BBK	Reviewing AX factual research regarding former BD executive potential witness.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/1/2020	BBK	Reviewing M. Johnson internal memo distributed to co-counsel regarding status of each discovery dispute and planned approach for next steps.	0.2	
5/1/2020	AX	Team strategy conference.	0.7	
5/1/2020	AX	(Billing Judgment) Review news articles regarding Brookdale lawsuit in M.D. Tn; circulate bio of Brookdale executive.	0.0	0.3
5/1/2020	AX	Update Brookdale to-do list and circulate to team.	0.5	
5/1/2020	JSY	Team meeting.	0.5	
5/1/2020	JSY	Emails regarding class member declarations and similar case; research regarding same.	0.6	
5/1/2020	KES	Team conference call regarding class member declarations, discovery responses.	0.6	
5/1/2020	KES	Online research regarding new out of state proposed class action against Brookdale.	0.2	
5/3/2020	BBK	Reviewing AX report regarding assignments of class reps for interrogatory responses and declarations and conferring with her regarding this.	0.2	
5/3/2020	AX	Update team to-do list; correspondence with team regarding same.	0.7	
5/4/2020	BBK	Conferring w JSY regarding preparing discovery responses for class reps.	0.1	
5/4/2020	AX	Email correspondence with team regarding interrogatory assignments.	0.1	
5/4/2020	JSY	T/C with ML regarding declaration; emails regarding same; draft same.	1.5	
5/4/2020	KES	Gather and arrange for upload of additional client documents to Relativity.	0.6	
5/4/2020	KES	Review correspondence from relative of Brookdale resident and check communications history on tracking charts.	0.2	
5/5/2020	GCG	Review lawsuit filed in TN based on understaffing.	0.1	
5/5/2020	GCG	Conf with SJR regarding experts.	0.1	
5/5/2020	SJR	Telephone conference with GG.	0.1	
5/6/2020	GCG	Review defendant's revisions to residency agreement stipulation.	0.1	
5/6/2020	GCG	Email to MJ regarding our response.	0.1	
5/6/2020	GCG	Email to GW regarding class cert strategy.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/6/2020	BBK	Reviewing proposed revised stipulation regarding residency agreements sent by G. Maatman and comments by M. Johnson and GCG regarding appropriate next steps.	0.1	
5/8/2020	GCG	Review class representative documents and notes from interviews.	0.5	
5/8/2020	GCG	Conf with BBK, JSY, AX, KES and EH regarding class member declarations and discovery responses.	0.6	
5/8/2020	GCG	Email to JSY and team regarding potential ESI custodians.	0.2	
5/8/2020	GCG	Email to MJ and GM regarding meet and confer issues.	0.1	
5/8/2020	BBK	Reviewing meet and confer e-mails between M. Johnson and G. Maatman regarding PSS data production.	0.1	
5/8/2020	BBK	Reviewing meet and confer e-mails between M. Johnson and G. Maatman regarding stipulation regarding residency agreements that Brookdale refuses to look for.	0.1	
5/8/2020	BBK	Participating in RBGG team meeting regarding upcoming case tasks and priorities.	0.6	
5/8/2020	BBK	Drafting/sending FU email to Schneider Wallace re RFPs and ROGs.	0.1	
5/8/2020	BBK	Conferring with T. Close and R. Steyer regarding draft declarations from Brookdale residents.	0.2	
5/8/2020	AX	Brookdale team strategy meeting.	0.5	
5/8/2020	AX	Update team to-do list.	0.2	
5/8/2020	AX	Review sample interrogatory and RFP responses.	0.7	
5/8/2020	JSY	Team meeting and emails regarding custodians.	0.7	
5/8/2020	KES	Team conference call regarding discovery, class member declarations.	1.0	
5/8/2020	KES	Review ESI list and compare with complaints database for possible additions.	0.2	
5/9/2020	GCG	Email MJ and GM regarding residency agreement dispute.	0.1	
5/11/2020	GCG	Email to MJ regarding putative class member email to JSY.	0.1	
5/11/2020	AX	Update Stiner contact log.	0.2	
5/11/2020	JSY	Emails regarding issues at Redwood City.	0.1	
5/12/2020	BBK	Reviewing KES report regarding additional names for ESI custodian list taken from complaints database.	0.1	
5/12/2020	BBK	(Billing Judgment) reviewing AX's updated case task list for RBGG team distributed today.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
5/12/2020	AX	Follow up with potential memory care class members family member.	0.2	
5/12/2020	AX	Update Brookdale to-do list and distribute to team.	0.3	
5/12/2020	KES	Review complaint database for potential additional names to add to ESI production request and email team regarding same.	1.0	
5/13/2020	BBK	Reviewing/forwarding contact from family of Brookdale resident in Santa Monica.	0.1	
5/13/2020	AX	Review documents and draft responses for plaintiffs' discovery responses.	2.1	
5/13/2020	AX	Read team correspondence regarding meet and confer with opposing counsel on counter proposal for stip.	0.2	
5/13/2020	JSY	Research and calendar mandate dates.	0.3	
5/13/2020	JSY	Draft ML declaration.	0.5	
5/14/2020	GCG	Emails to MJ and GM regarding proposed residency agreement stipulation.	0.1	
5/14/2020	JSY	Work on discovery responses.	1.5	
5/14/2020	BBK	Reviewing M. Johnson - G. Maatman communications regarding stipulation regarding residency agreements and meeting and conferring on PSS data issues.	0.1	
5/14/2020	BBK	Conferring with JSY regarding preparing discovery responses for clients.	0.2	
5/14/2020	AX	Review draft declaration for Quinlan and make edits.	0.6	
5/14/2020	AX	Review draft interrogatory and RFP responses for plaintiffs.	0.3	
5/14/2020	AX	Review documents and draft interrogatory responses for Bernie Jestrabek-Hart.	1.1	
5/14/2020	JSY	Draft ML declaration.	2.0	
5/14/2020	AX	Email communication with JY and BBK regarding draft interrogatories/RFP responses.	0.1	
5/15/2020	GCG	Meet with team to discuss plaintiffs' responses to discovery requests and other discovery issues.	0.3	
5/15/2020	GCG	Email to MJ and team regarding complaint database potential custodians.	0.1	
5/15/2020	GCG	Outreach to potential witness.	0.1	
5/15/2020	BBK	RBGG team meeting on case priorities to discuss status of declarations and discovery responses.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2020	BBK	Conferring with JSY/AX and WP regarding interrogatory responses.	0.1	
5/15/2020	AX	Review form interrogatory responses.	1.3	
5/15/2020	AX	Review documents for Bernie Jestrabek-Hart regarding RFP and email correspondence with KS regarding same.	0.7	
5/15/2020	AX	Draft responses to interrogatories for Bernie Jestrabek-Hart.	1.8	
5/15/2020	AX	Review Loresia Vallette draft declaration and documents.	0.4	
5/15/2020	AX	Brookdale team meeting.	0.4	
5/15/2020	AX	Update to-do list.	0.1	
5/15/2020	AX	Email correspondence with JSY and BBK regarding form responses for interrogatories.	0.2	
5/15/2020	JSY	Team meeting.	0.3	
5/15/2020	JSY	Emails regarding discovery responses; work on same.	0.5	
5/15/2020	KES	Confer AX regarding client documents for class rep.	0.2	
5/18/2020	GCG	Review issuance of mandate; emails to JSY and KES regarding same.	0.1	
5/18/2020	GCG	Email to MJ and GG regarding ESI custodians and email to KES regarding factual research.	0.1	
5/18/2020	JSY	Emails regarding mandate.	0.1	
5/20/2020	GCG	Emails to AX and team regarding potential class member declarations and contacts with our office.	0.1	
5/20/2020	GCG	Email to BA regarding concerns regarding Northridge.	0.1	
5/20/2020	BBK	Conferring with AX and team regarding FU with intake received from family of Brookdale Santa Monica resident.	0.1	
5/20/2020	AX	Review and draft interrogatory responses for Bernie Jestrabek-Hart; draft correspondence to team regarding same.	2.8	
5/20/2020	AX	Follow up with email lead regarding potential class member.	0.3	
5/20/2020	AX	Review and draft RFP responses for Bernie Jestrabek-Hart.	1.0	
5/20/2020	KES	Telephone conference with relative of Brookdale resident and follow up email regarding same.	0.7	
5/20/2020	KES	Review email regarding draft discovery responses regarding class rep.	0.1	
5/20/2020	KES	Review emails regarding follow up calls with relatives of Brookdale residents.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/21/2020	AX	Follow up with email lead regarding potential class member.	0.1	
5/21/2020	JSY	Draft ROG responses for Boris; research regarding same.	3.7	
5/21/2020	KES	Follow up email with relative of Brookdale resident.	0.1	
5/22/2020	GCG	Emails regarding discovery disputes with defendants and responses to discovery served on plaintiffs.	0.3	
5/22/2020	BBK	Reviewing opposing counsel emails to M. Johnson regarding discovery issues.	0.1	
5/22/2020	AX	Follow up on outreach contacts.	0.3	
5/22/2020	AX	Update Brookdale case task list.	0.3	
5/22/2020	AX	Draft questions to team re: discovery responses.	0.5	
5/22/2020	JSY	Emails regarding team meeting and tasks.	0.1	
5/26/2020	GCG	Emails to MJ regarding discovery call with defendants.	0.1	
5/26/2020	GCG	Email to BBK and conf with JSY regarding plaintiffs' responses to discovery requests.	0.1	
5/26/2020	BBK	Analyzing RFP Responses and drafting bullet-point list of categories of documents sought which we agree to produce, for use by team when conferring with clients regarding discovery responses.	1.1	
5/26/2020	AX	Review BBK email regarding RFPs; draft responses to Bernie Jestrabek-Hart's RFPs; email correspondence with KES regarding same; review documents regarding same.	1.8	
5/26/2020	JSY	Draft ROG responses for Lytle/Boris.	2.4	
5/26/2020	KES	Review draft discovery responses re Bernie Jestrabek Hart.	0.8	
5/26/2020	KES	Emails with Bernie Jestrabek-Hart re conference call to discuss discovery responses; confer AX re same.	0.5	
5/27/2020	GCG	Conf with JSY regarding plaintiffs' document production and redactions thereto.	0.1	
5/27/2020	BBK	Preparing Interrogatory Responses for H. Carlson and A. Lindstrom.	1.6	
5/27/2020	AX	Confer with KES regarding Bernie Jestrabek-Hart documents, declaration, and in preparation for phone call.	0.5	
5/27/2020	AX	Phone conference with KES, Bernie Jestrabek-Hart regarding RFPs, interrogatories.	1.4	
5/27/2020	AX	Revise notes after call.	0.3	
5/27/2020	JSY	Draft ROG responses for Boris/Lytle.	3.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/27/2020	KES	Telephone conference with Brookdale resident regarding issues and possible declaration; email with daughter and review documents regarding same.	1.2	
5/27/2020	KES	Conference call with Bernie Jestrabek-Hart and AX regarding responses to discovery.	1.3	
5/27/2020	KES	Review draft discovery responses and confer AX regarding same.	0.8	
5/28/2020	AX	Email correspondence with Loresia Vallette regarding 9th Circuit appeal and discovery requests.	0.3	
5/28/2020	AX	Review Vallette/Quinlan draft declaration and client documents.	0.4	
5/28/2020	AX	Correspondence with KES regarding Bernie Jestrabek-Hart discovery requests.	0.1	
5/28/2020	JSY	Draft ROG responses for Boris/Lytle.	1.4	
5/28/2020	AX	Draft questions for conversation with Loresia Vallette.	1.7	
5/28/2020	AX	Review client documents for Lawrence Quinlan.	2.2	
5/28/2020	KES	Update class rep documents folder.	0.5	
5/28/2020	KES	Draft and send letter to class rep regarding additional responsive documents and review notes from telephone conversation regarding same.	0.8	
5/29/2020	GCG	Conf with team regarding responding to discovery served on plaintiffs.	0.5	
5/29/2020	GCG	Email to AX and team regarding legal research for class cert motion regarding typicality of representative.	0.1	
5/29/2020	BBK	Conferring with JSY regarding plans for document production.	0.1	
5/29/2020	BBK	Reviewing M. Johnson update to opposing counsel regarding production of docs received from 3rd party SDTs and reviewing opposing counsel update regarding latest doc production.	0.1	
5/29/2020	BBK	Conducting factual research for Carlson discovery responses and conferring with KES regarding locating relevant docs.	0.5	
5/29/2020	BBK	Conducting factual research for and preparing Lindstrom discovery responses.	0.7	
5/29/2020	BBK	Participating in RBGG team meeting regarding completing discovery responses.	0.5	
5/29/2020	BBK	Drafting/sending email to co-counsel regarding discovery response & doc production plan.	0.4	
5/29/2020	BBK	Emails re meeting regarding discovery responses plan.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/29/2020	BBK	Conferring with RBGG team regarding research project on adequacy/typicality requirement as applies to particular factual circumstances potentially at issue in case.	0.1	
5/29/2020	AX	Review documents in preparation for conversation with Loresia Vallette.	1.3	
5/29/2020	AX	Call w/ Loresia Vallette.	1.1	
5/29/2020	AX	Team strategy meeting.	0.5	
5/29/2020	AX	Begin draft memos re: conversations with Loresia Vallette and Bernie Jestrabek-Hart.	0.3	
5/29/2020	JSY	Edit Boris discovery responses; emails regarding same.	2.1	
5/29/2020	JSY	T/C with M. Lytle regarding discovery responses.	1.0	
5/29/2020	JSY	Team meeting; emails regarding meeting to discuss discovery responses.	0.5	
5/29/2020	AX	Email correspondence w/ team re: case task list and summer associate project.	0.3	
5/29/2020	KES	Team video-conference regarding discovery responses.	0.5	
5/29/2020	KES	Email BBK regarding client documents.	0.1	
5/31/2020	AX	Review notes and draft memo re: conversation w/ Loresia Vallette; revise notes re: declaration and responses to discovery.	1.5	
6/1/2020	BBK	Reviewing M. Johnson proposed compromise w/ opposing counsel on dispute over residency agreements.	0.1	
6/1/2020	BBK	Conferring w/ EH re PL discovery responses.	0.3	
6/1/2020	BBK	Emails re meeting on discovery responses.	0.2	
6/1/2020	BBK	Participating in ZOOM meeting on discovery responses w/ JSY, AX, M. Johnson, B. Umpierre, and S. Colby.	0.7	
6/1/2020	BBK	Conferring w/ J. Carlson by email re discovery responses.	0.4	
6/1/2020	BBK	Preparing P. Lindstrom interrogatory responses (including factual research and drafting responses).	4.8	
6/1/2020	AX	Email correspondence w/ team re: discovery; team strategy conference re: Defs RFPs and interrogatories.	1.0	
6/1/2020	AX	Email correspondence w/ team re: Stiner declarations.	0.2	
6/1/2020	AX	Draft summary memo of conversation w/ Bernie Jestrabek-Hart.	1.5	
6/1/2020	AX	Review KES notes re: meeting with Bernie Jestrabek-Hart.	0.1	
6/1/2020	JSY	Team meeting re discovery responses.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/1/2020	JSY	Draft discovery responses; call with client re same.	4.0	
6/1/2020	KES	Email AX re previous conversations with client in connection with discovery response preparation.	0.2	
6/1/2020	EH	Coordinated and scheduled call with named plaintiff re discovery responses.	0.5	
6/2/2020	BBK	Conferring w/ EH re scheduling call re discovery responses w/ P. Lindstrom and her analysis of draft interrogatory responses in advance.	0.3	
6/2/2020	BBK	Preparing Lindstrom interrogatory responses (including factual research from docs and drafting).	3.2	
6/2/2020	BBK	Reviewing JSY update re call w/ Algarme.	0.1	
6/2/2020	BBK	Preparing H. Carlson interrogatory responses (including factual research and drafting).	1.7	
6/2/2020	BBK	Reviewing AX memo re recent communications w/ Jestrabek-Hart.	0.1	
6/2/2020	AX	Review strategy memo re: named plaintiff and circulate to team.	0.3	
6/2/2020	AX	Read correspondence w/ team re: discovery responses.	0.1	
6/2/2020	AX	Review correspondence w/ team re: staffing analysis.	0.1	
6/2/2020	AX	Review MJ's new responses to RFPs.	0.2	
6/2/2020	JSY	Draft discovery responses; emails re same; call with client re same.	4.4	
6/3/2020	GCG	Conf w/ AX and email to JY re plaintiffs' discovery responses.	0.1	
6/3/2020	BBK	Reviewing M. Johnson's email re RFP Responses.	0.1	
6/3/2020	BBK	Reviewing EH report re info for Lindstrom discovery responses.	0.2	
6/3/2020	BBK	Conferring w/ EH re plan for call w/ Lindstrom.	0.2	
6/3/2020	BBK	Conferring w/ AX, JSY, and co-counsel re communications w/ clients Jestrabek-Hart and Algarme.	0.1	
6/3/2020	BBK	Preparing Carlson interrogatory responses (including factual research and drafting responses).	3.2	
6/3/2020	AX	Finalize and circulate memo to team re: named plaintiff Bernie Jestrabek-Hart (.3); email correspondence w/ team re: same (.1).	0.4	
6/3/2020	AX	Draft responses to Defendants' Interrogatories and Document Requests to Bernie Jestrabek-Hart.	2.7	
6/3/2020	JSY	Draft discovery responses; t/c with JA re same.	5.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/3/2020	EH	Reviewed draft discovery responses for upcoming call with named plaintiff.	1.6	
6/4/2020	BBK	Reviewing M. Johnson communications w/ opposing counsel re reaching impasse on residency agreements dispute and need to finalize/submit joint letter brief.	0.1	
6/4/2020	BBK	Preparing for call w/ P. Lindstrom re discovery responses.	0.3	
6/4/2020	BBK	Conferring by phone w/ P. Lindstrom and EH re discovery responses.	1.6	
6/4/2020	BBK	Conferring by phone w/ EH post-call w/ P. Lindstrom re discovery responses to discuss drafting FU email w/ requests.	0.3	
6/4/2020	BBK	Drafting/sending update to team re call w/ P. Lindstrom re discovery responses.	0.3	
6/4/2020	BBK	Reviewing EH notes from P. Lindstrom call re discovery responses.	0.2	
6/4/2020	BBK	Conferring w/ co-counsel and JSY/AX re requesting extension to respond to discovery.	0.3	
6/4/2020	BBK	Drafting Carlson interrogatory responses.	0.5	
6/4/2020	BBK	Preparing for call w/ J. Carlson re discovery responses.	0.3	
6/4/2020	BBK	Reviewing/revising EH's draft email follow-up to P. Lindstrom re documents and information to search for in order to prepare discovery responses, and update re extension on deadline.	0.3	
6/4/2020	AX	Draft responses to interrogatories for Bernie Jestrabek-Hart.	3.3	
6/4/2020	AX	Draft email to Bernie Jestrabek-Hart re: questions for discovery responses.	0.4	
6/4/2020	AX	Email correspondence w/ team re: extension.	0.3	
6/4/2020	JSY	Emails re issues with discovery responses; review client documents re same.	0.3	
6/4/2020	JSY	Emails re extension of time re discovery responses and client documents.	0.1	
6/4/2020	JSY	T/C with JA re interrogatories and document requests.	0.5	
6/4/2020	EH	Call with BBK and named plaintiff re discovery responses.	2.0	
6/5/2020	GCG	Email to GW re pending issues.	0.1	
6/5/2020	GCG	Conf w/ BBK, AX, JSY and KES re class member interviews and drafting their discovery responses.	0.6	
6/5/2020	BBK	Preparing for call w/ J. Carlson re discovery responses.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/5/2020	BBK	Conferring by phone w/ J. Carlson re discovery responses and document production.	1.8	
6/5/2020	BBK	Conferring by e-mail w/ J. Carlson post-call re identifying/sending additional documents.	0.1	
6/5/2020	BBK	Reviewing emails forwarded by J. Carlson re move into Memory Care.	0.1	
6/5/2020	BBK	Reviewing JSY notes from call w/ witness.	0.1	
6/5/2020	BBK	Planning/preparing questions for team for meeting on discovery responses.	0.2	
6/5/2020	BBK	Participating in meeting on discovery responses.	0.6	
6/5/2020	BBK	Participating in RBGG team Zoom meeting on case issues, including discovery responses and preparing declarations.	0.5	
6/5/2020	AX	Draft discovery responses.	1.3	
6/5/2020	AX	Attend strategy conference w/ cocounsel, BBK, JSY re: discovery.	0.5	
6/5/2020	AX	Attend strategy conference with BBK, JSY, GCG re: case updates.	0.5	
6/5/2020	AX	Update case task list and circulate to team; send discovery documents to cocounsel.	0.1	
6/5/2020	JSY	T/C with witness; emails re same.	0.5	
6/5/2020	JSY	Team meetings re discovery responses.	1.2	
6/5/2020	KES	Follow up with AX and ML re documents expected from client.	0.2	
6/8/2020	GCG	Email to GW re status.	0.1	
6/8/2020	BBK	Preparing list of docs for J. Carlson to search for and drafting/sending email re discovery responses.	0.4	
6/8/2020	JSY	Emails re client documents.	0.1	
6/9/2020	GCG	Review correspondence re multiple discovery issues in preparation for potential motions to compel.	0.6	
6/9/2020	GCG	Prepare for and conduct call w/ GW re expert issues.	0.7	
6/9/2020	GCG	Email to SJR and MWB re same.	0.1	
6/9/2020	GCG	Conf w/ JM re ADA inspections and expert report drafting.	0.2	
6/9/2020	GCG	Run experts thought conflicts.	0.2	
6/9/2020	SJR	(Billing Judgment) Email from GG re status.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
6/9/2020	BBK	Conferring w/ J. Carlson re new documents identified that may be responsive to Defendants' RFPs and plan for scheduling follow-up call on discovery responses.	0.1	
6/9/2020	BBK	Conferring w/ EH re new documents received from J. Carlson.	0.1	
6/9/2020	BBK	Reviewing communications between M. Johnson and G. Maatman re meeting and conferring on PSS data production and what else can/should be produced for staffing experts.	0.1	
6/9/2020	JSY	Emails re client documents.	1.0	
6/9/2020	JSY	Emails re ML re discovery responses.	0.1	
6/9/2020	EH	Organized incoming documents from named plaintiffs' for discovery responses.	0.5	
6/10/2020	GCG	Email to MJ and BBK re motion to compel ADA procedures.	0.1	
6/10/2020	BBK	Reviewing/commenting on M. Johnson's draft joint letter brief for discovery dispute over evacuation and transportation policies and ADA compliance policies at facility level.	0.2	
6/10/2020	BBK	Conferring w/ J. Carlson re additional potentially discoverable documents she located and forwarded.	0.1	
6/10/2020	AX	Review Bernie Jestrabek-Hart client documents.	0.5	
6/10/2020	KES	Review status of additional documents sent by client.	0.1	
6/11/2020	GCG	Review team emails re BJH and SS documents.	0.3	
6/11/2020	GCG	Emails to JSY and team re harassment of named plaintiff over medication.	0.4	
6/11/2020	BBK	Reviewing communications between AX and co-counsel re S. Stiner documents.	0.1	
6/11/2020	BBK	Reviewing JSY update re concerns reported by J. Algarme and T. Close's proposed response.	0.1	
6/11/2020	AX	Email correspondence w/ team re: client documents.	0.5	
6/11/2020	AX	Emails w/ team re: status on various projects; follow up with Loresia Vallette.	0.2	
6/11/2020	JSY	Multiple T/C with JA and daughter; emails with team re same.	1.0	
6/11/2020	FFV	Emails to/from JSY, AX and ML re personal records of BJH.	0.2	
6/11/2020	KES	Review and organize new client documents and emails with co-counsel re same.	1.5	
6/11/2020	KES	Update electronic files.	0.1	
6/11/2020	KES	Review emails re client issues.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/12/2020	GCG	Review JSY and SC reports on named class rep being harassed and retaliated against.	0.2	
6/12/2020	GCG	Conduct team meeting to discuss issues being addressed in plaintiffs' discovery responses.	0.6	
6/12/2020	GCG	Email to GW and team re class member outreach and declarations.	0.1	
6/12/2020	BBK	Reviewing S. Colby update re call w/ R. Stiner and M. Johnson response to concerns.	0.1	
6/12/2020	BBK	Drafting/sending follow-up email to P. Lindstrom re scheduling next call re discovery responses.	0.1	
6/12/2020	BBK	Conferring w/ GCG re plan for discovery responses.	0.1	
6/12/2020	BBK	Participating in RBGG team meeting on case tasks (including discovery responses, discovery disputes, class member declarations, and new plaintiffs).	0.5	
6/12/2020	BBK	Reviewing/replying to P. Lindstrom e-mail re discovery responses and scheduling follow-up call.	0.2	
6/12/2020	BBK	Reviewing JSY response to J. Algarme re client concerns.	0.1	
6/12/2020	BBK	Reviewing M. Johnson update to team re meet and confer on PSS data dispute.	0.1	
6/12/2020	AX	Attend Brookdale weekly team strategy meeting and distribute updated team task list.	0.6	
6/12/2020	AX	Email correspondence w/ Bernie.	0.1	
6/12/2020	JSY	Team meeting.	0.5	
6/12/2020	JSY	Research re medication storage issue; draft email to JA re same.	0.7	
6/12/2020	JSY	Emails with team re issues with SS.	0.1	
6/12/2020	KES	Team meeting re discovery and other case issues.	0.6	
6/12/2020	EH	Weekly team conference re case updates and discovery responses.	0.4	
6/13/2020	GCG	Review AX memo to file re pending research and discovery projects.	0.1	
6/13/2020	GCG	Review MJ report on defendants' production of PSP reports not data.	0.1	
6/13/2020	GCG	Review SC report on issues facing named plaintiff.	0.1	
6/14/2020	AX	Email correspondence w/ JY re: research project.	0.1	
6/15/2020	BBK	Preparing P. Lindstrom Interrogatory responses based on client call.	2.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/15/2020	AX	Zoom meeting w/ JY and (AD) re: research project; correspondence re: same.	0.7	
6/15/2020	AX	Email correspondence w/ GCG re: case tasks.	0.1	
6/15/2020	JSY	Emails re research assignment for AD; call and emails re same.	0.8	
6/15/2020	AD	Conference with AX and JY about class representative research project.	0.6	
6/16/2020	BBK	Reviewing Defendants' section of joint discovery dispute letter brief re Plaintiffs' request for facility-level policies on evacuation, transportation, and ADA compliance.	0.1	
6/16/2020	BBK	Preparing P. Lindstrom interrogatory responses based on prior interview.	1.8	
6/17/2020	BBK	Preparing P. Lindstrom interrogatory responses.	1.1	
6/17/2020	AX	Email w/ cocounsel re: Bernie Jestrabek Hart's documents draft interrogatory and document production requests.	2.0	
6/17/2020	JSY	Collect client documents; emails re same.	0.4	
6/18/2020	GCG	Emails to AX and team re plaintiffs' discovery responses.	0.2	
6/18/2020	GCG	Conf w/ and emails to KES and emails to JSY re putative class member call.	0.2	
6/18/2020	JSY	Emails re contact from putative class member; calls re same; draft response re same.	1.0	
6/18/2020	BBK	Conferring w/ EH re analysis of P. Lindstrom handwritten notes on financial docs for discovery responses.	0.1	
6/18/2020	BBK	Conferring w/ AX re standard marketing folder and interrogatory responses.	0.2	
6/18/2020	BBK	Reviewing M. Johnson revisions to joint letter brief re discovery dispute over facility policies on evacuation, transportation, and ADA compliance in response to Defendants' section of brief.	0.1	
6/18/2020	AX	Review client documents for Bernie Jestrabek-Hart, including Resident Handbook, marketing materials, and billing information from 2015-2020.	1.4	
6/18/2020	AX	Correspondence w/ team re: standardized marketing language.	0.3	
6/18/2020	AX	Class member outreach issues.	0.3	
6/18/2020	AX	Client documents on Relativity w/ cocounsel.	0.3	
6/18/2020	AX	Draft BJH interrogatory and document production responses.	2.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/18/2020	KES	Review client Algarme emails attaching documents, compare with existing documents, and review and organize same for files.	1.5	
6/18/2020	KES	Telephone call with relative of former Brookdale resident and follow up with team re former communications and contact issues.	2.0	
6/18/2020	EH	Organized draft declarations from residents in support of class cert motion.	0.7	
6/19/2020	BBK	Email to P. Lindstrom re discovery responses.	0.1	
6/19/2020	BBK	Drafting/sending e-mail to J. Carlson re discovery responses.	0.1	
6/19/2020	BBK	Participating in RBGG team meeting on case tasks (including discovery responses and memory care P).	0.5	
6/19/2020	AX	Brookdale weekly team meeting and circulate notes from meeting.	0.5	
6/19/2020	AX	Call Loresia Vallette re: discovery responses and send email follow up.	0.3	
6/19/2020	JSY	Team meeting.	0.5	
6/19/2020	KES	Team conference re discovery status and class member contact.	0.4	
6/19/2020	AD	(Billing Judgment) Attend weekly conference about status of the case.	0.0	0.5
6/19/2020	AD	(Billing Judgment) Review complaint.	0.0	1.0
6/19/2020	AD	(Billing Judgment) Review BJ draft declaration.	0.0	0.2
6/19/2020	AD	Research class certification requirements for named plaintiffs.	0.7	
6/19/2020	EH	Weekly conference re discovery responses and class member outreach.	0.3	
6/21/2020	AD	Research standing and requirements for class certification.	1.0	
6/22/2020	BBK	Conferring w/ P. Lindstrom re discovery responses.	0.1	
6/22/2020	BBK	Conferring w/ J. Carlson re discovery responses.	0.2	
6/22/2020	BBK	Reviewing EH analysis of P. Lindstrom docs for discovery responses and conferring w/ her re same.	0.2	
6/22/2020	AX	Meeting with AD re: check in about research project.	0.5	
6/22/2020	AX	Draft interrogatory responses.	2.1	
6/22/2020	KES	Organize new client documents.	0.9	
6/22/2020	AD	Research class certification and standing for named plaintiff.	3.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/22/2020	AD	Conference with AX about research assignment.	0.6	
6/23/2020	BBK	Conferring w/ P. Lindstrom re scheduling follow-up call re discovery responses.	0.1	
6/23/2020	AX	Email correspondence w/ BJH re: interrogatories.	0.2	
6/23/2020	AX	Phone call w/ Loresia Vallette re: interrogatories and update memo re: recent contacts.	0.3	
6/23/2020	AX	Draft BJH interrogatories and circulate to team.	1.8	
6/23/2020	AX	Email correspondence w/ cocounsel re: Relativity.	0.1	
6/23/2020	JSY	Emails with ML re edits to interrogatory responses.	0.1	
6/23/2020	KES	Organize new client documents and arrange for upload to Relativity.	0.9	
6/23/2020	AD	Research class certification and standing for named plaintiff.	2.2	
6/23/2020	AD	Research class certification and standing and draft memo.	3.5	
6/24/2020	GCG	Emails to GW and MJ re motions to compel and discovery issues.	0.2	
6/24/2020	BBK	Reviewing communications between M. Johnson and opposing counsel re finalizing/filing joint letter brief on discovery dispute of facility-level policies on transportation, evacuation and ADA compliance.	0.1	
6/24/2020	AX	Email correspondence w/ BJH re: phone call to finalize declaration.	0.3	
6/24/2020	AX	Email correspondence w/ BJH re: interrogatory responses (.1); review BJH email with revisions to interrogatories (.2).	0.3	
6/24/2020	AD	Research and write memo on class certification and standing - in particular typicality.	1.3	
6/25/2020	GCG	Emails to GW re expert analysis.	0.1	
6/25/2020	GCG	Email to JSY and BBK re AD legal research and team meeting.	0.1	
6/25/2020	BBK	Reviewing Ds' redlines to portion of joint letter discovery brief on facility level policies on transportation, evacuation, and ADA compliance.	0.2	
6/25/2020	BBK	Reviewing AD legal memo re standing and commonality/adequacy class rep issues.	0.2	
6/25/2020	AX	Call w/ BJH re: interrogatory responses.	0.7	
6/25/2020	AX	Revise interrogatory responses.	0.8	
6/25/2020	AX	Update BJH contacts memo.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/25/2020	AX	Review AD memo re: standing and class action factors.	0.3	
6/25/2020	JSY	Review memo by AD about class cert issues; emails re same.	0.3	
6/25/2020	AD	Research and write memo on class certification and standing.	3.0	
6/26/2020	JSY	Emails re team meeting.	0.1	
6/26/2020	JSY	Team meeting.	0.9	
6/26/2020	JSY	Edit ML discovery response; email to team.	1.0	
6/26/2020	BBK	Reviewing M. Johnson follow-up request for further information re PSS data production.	0.1	
6/26/2020	BBK	Participating in RBGG Brookdale team meeting re case tasks, including discovery responses and production.	0.7	
6/26/2020	BBK	Drafting/sending email to M. Johnson re plan for reviewing draft ROG responses to ensure consistency and address questions that have arisen.	0.2	
6/26/2020	AX	Review AD memo.	0.3	
6/26/2020	AX	Attend Brookdale weekly team meeting and circulate notes re: same to team.	0.8	
6/26/2020	AX	Review correspondence from team re: discovery disputes.	0.2	
6/26/2020	KES	Team meeting re discovery and other case issues.	0.8	
6/26/2020	AD	Review memo on class certification and standing.	0.1	
6/26/2020	AD	(Billing Judgment) Attend weekly conference about status of the case.	0.0	0.7
6/29/2020	GCG	Research re Brookdale financial condition.	0.2	
6/29/2020	GCG	Review emails re plaintiffs' discovery.	0.1	
6/29/2020	BBK	Conferring w/ J. Carlson re discovery responses.	0.1	
6/29/2020	BBK	Preparing Carlson interrogatory responses.	1.6	
6/30/2020	GCG	Further research re Brookdale financial condition; email to SJR and MWB re same.	0.2	
6/30/2020	GCG	Emails to MJ and defendants re filing of meet and confer letter brief.	0.1	
6/30/2020	GCG	Emails to AX and JY re review of draft discovery responses.	0.1	
6/30/2020	SJR	Emails re financing.	0.3	
6/30/2020	BBK	Reviewing/analyzing P. Lindstrom documents and draft interrogatory responses to plan FU questions re discovery responses.	2.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/30/2020	BBK	Conferring by phone w/ P. Lindstrom re discovery.	1.9	
6/30/2020	BBK	Conferring w/ EH re P. Lindstrom docs.	0.1	
6/30/2020	BBK	Reviewing communications w/ opposing counsel re finalizing/filing joint letter discovery brief on facility level policies on transportation, evacuation, and ADA compliance.	0.1	
6/30/2020	BBK	Conferring w/ AX and JSY re FU w/ M. Johnson re review of draft interrogatory responses for consistency.	0.2	
6/30/2020	BBK	Drafting revisions to P. Lindstrom interrogatory responses consistent w/ P. Lindstrom call.	1.1	
6/30/2020	AX	Email correspondence w/ team re: review process for discovery responses.	0.4	
6/30/2020	KES	Download and circulate filed discovery brief.	0.1	
7/1/2020	GCG	Conf w/ BBK and email from GW re plaintiffs' discovery responses.	0.1	
7/1/2020	BBK	Drafting/sending email to co-counsel and team re ROG Response drafts.	0.2	
7/1/2020	BBK	Emails re docs from P. Lindstrom.	0.2	
7/1/2020	JSY	Edit JA discovery responses; emails re same.	5.0	
7/1/2020	KES	Download and circulate discovery order.	0.1	
7/2/2020	BBK	Planning/preparing for call w/ J. Carlson re preparing discovery responses and ensuring we have all responsive docs.	0.3	
7/2/2020	BBK	Conferring by phone w/ J. Carlson re preparing discovery responses and ensuring we have all responsive docs.	0.6	
7/5/2020	GCG	Review AX interrogatory responses and email to GW re same.	0.2	
7/5/2020	AX	Draft Lawrence Quinlan response to interrogatories; review client documents.	2.9	
7/5/2020	AX	Draft responses to rogs for Lawrence Quinlan/Loresia Vallette.	1.1	
7/5/2020	AX	Send draft discovery responses to Loresia Vallette with questions, schedule time to review draft.	0.3	
7/6/2020	GCG	Conf w/ SJR and MWB re expert issues.	0.4	
7/6/2020	GCG	Initial review of plaintiffs' discovery responses.	0.2	
7/6/2020	GCG	Conf w/ JSY and emails to AX, BBK and GW re same and re class member.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/6/2020	GCG	Emails to KES and team re new lawsuit filed against Brookdale for misrepresentation of staffing.	0.1	
7/6/2020	GCG	Emails to MJ and GM re discovery brief filed with court.	0.1	
7/6/2020	MWB	(Reduced Charge) Telephone conference with SJR and GCG regarding strategy.	0.4	0.3
7/6/2020	SJR	(Reduced Charge) Telephone conference with GG, MWB re next steps.	0.4	0.2
7/6/2020	BBK	Conferring w/ KES re uploading of new docs rec'd from P. Lindstrom and J. Carlson to Relativity for doc production and/or tagging for AC privilege.	0.1	
7/6/2020	BBK	Reviewing/analyzing documents sent by P. Lindstrom.	0.5	
7/6/2020	BBK	Reviewing/responding to AX update re Quinlan health and need to request extension for discovery responses due to this.	0.2	
7/6/2020	BBK	Conferring w/ RBGG team and co-counsel re need for extension request.	0.1	
7/6/2020	BBK	Preparing Lindstrom ROG Responses.	4.5	
7/6/2020	BBK	Drafting/sending email forwarding draft Lindstrom ROG Responses to G. Wallace.	0.1	
7/6/2020	BBK	Reviewing joint discovery letter brief filed today on production of remaining residency agreements.	0.1	
7/6/2020	AX	Email correspondence w/ team re Loresia Vallette and rog responses.	0.1	
7/6/2020	AX	Phone call w/ JY re: Quinlan's discovery responses (.2); email correspondence w/ team re: same (.2); draft email to Loresia Vallette (.2).	0.6	
7/6/2020	JSY	T/C with AX re discovery responses.	0.2	
7/6/2020	JSY	Conf. w/ GCG re discovery responses and next steps.	0.1	
7/6/2020	KES	Download and circulate pleading.	0.1	
7/6/2020	KES	Brief review of status of additional client documents for upload to Relativity.	0.1	
7/6/2020	KES	Online research re new suit against Brookdale.	0.2	
7/7/2020	GCG	Conf w/ MJ and emails to GW and team re outstanding discovery disputes, plaintiffs' discovery responses and class cert motion.	0.8	
7/7/2020	GCG	Review court filings; update case contacts.	0.1	
7/7/2020	SJR	Emails with GG re arrangements.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/7/2020	BBK	Preparing Lindstrom ROG Response draft for sharing w/ client.	0.2	
7/7/2020	BBK	Conferring w/ JSY and AX re plan for finalizing ROG responses and final client review.	0.1	
7/7/2020	BBK	Conferring w/ JSY and AX re FU w/ co-counsel re status of discovery responses and extension request.	0.1	
7/7/2020	BBK	Drafting/sending email to P. Lindstrom re discovery responses.	0.1	
7/7/2020	BBK	Conferring by email w/ RBGG team and co-counsel re extension request for discovery responses.	0.1	
7/7/2020	BBK	Preparing Lindstrom RFP Responses.	2.9	
7/7/2020	BBK	Reviewing M. Johnson report re strategy for jump-starting ESI production.	0.1	
7/7/2020	BBK	Reviewing M. Johnson - opposing counsel e-mails re complying w/ court order re M&C on facility-level policies on transportation/evacuation/ADA compliance.	0.2	
7/7/2020	AX	Emails with team re: progress on discovery responses.	0.2	
7/7/2020	JSY	Emails re extension for discovery responses.	0.1	
7/7/2020	KES	Download and circulate pleading.	0.1	
7/8/2020	GCG	Email to GW re class member and witness outreach.	0.1	
7/8/2020	GCG	Emails to MJ and GM re extension and discovery disputes.	0.1	
7/8/2020	BBK	Drafting/sending email update to J. Carlson re 30-day extension on discovery responses and planned next call.	0.1	
7/8/2020	BBK	Drafting Carlson RFP Responses.	0.8	
7/9/2020	BBK	Preparing for client call w/ P. Lindstrom re discovery responses.	0.2	
7/9/2020	BBK	Conferring by phone w/ P. Lindstrom re discovery responses.	0.4	
7/9/2020	BBK	Conferring w/ AX/GCG and co-counsel re scheduling call re status of discovery responses.	0.1	
7/9/2020	BBK	Reviewing P. Lindstrom e-mail re discovery responses and making revisions to interrogatory responses based on her comments.	0.3	
7/9/2020	AX	Email correspondence w/ team re: meeting w/ cocounsel.	0.3	
7/10/2020	GCG	Emails to GW re discovery plan.	0.2	
7/10/2020	BBK	Reviewing M. Johnson email to opposing counsel re requesting discovery conference.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/10/2020	KES	Download and circulate pleading.	0.1	
7/13/2020	GCG	Email to JM and MJ re discovery meet and confer.	0.2	
7/13/2020	GCG	Review and analyze AD memo re standing of named plaintiff.	0.1	
7/13/2020	BBK	Reviewing Court Order setting 7/30 discovery hearing; reviewing M. Johnson emails w/ opposing counsel re meeting and conferring on discovery disputes.	0.1	
7/13/2020	BBK	Preparing Carlson Interrogatory Responses (drafting answers and analyzing documents/materials).	2.3	
7/14/2020	BBK	Drafting/sending email to P. Lindstrom re next steps w/ discovery responses.	0.2	
7/14/2020	BBK	Preparing Carlson Interrogatory Responses.	0.6	
7/16/2020	GCG	Email to GW and MJ re call w/ defendants to discuss ESI.	0.1	
7/16/2020	BBK	Reviewing/replying to P. Lindstrom email re discovery responses.	0.1	
7/16/2020	BBK	Reviewing GCG- M. Johnson emails re plan for meet and confer call on 7/17.	0.1	
7/17/2020	GCG	Participate in meet and confer call w/ MJ, JM and S.S. team re status of discovery and request for class cert delay.	0.6	
7/17/2020	GCG	Follow up conf w/ MJ re next steps and MJ hearing.	0.2	
7/17/2020	GCG	Team meeting to discuss status of plaintiffs' discovery responses and preparing for plaintiffs' production.	0.6	
7/17/2020	BBK	Participating in RBGG team call on case tasks and next steps, w/ focus on discovery responses.	0.5	
7/17/2020	BBK	Reviewing AX outreach to co-counsel re discovery response planning meeting and co-counsel responses thereto.	0.1	
7/17/2020	BBK	Reviewing/revising draft updated case task list by AX.	0.1	
7/17/2020	AX	Email correspondence w/ Loresia Vallette.	0.1	
7/17/2020	AX	Brookdale weekly team strategy meeting.	0.5	
7/17/2020	AX	Draft email to co-counsel re: coordinating discovery responses.	0.5	
7/17/2020	AX	Update and circulate weekly to-do list.	0.3	
7/17/2020	AX	Review AD research memo and circulate to cocounsel.	0.5	
7/17/2020	JSY	Team meeting.	0.5	
7/17/2020	KES	Team meeting re discovery issues and other tasks.	0.5	
7/18/2020	AX	Email to team re: Loresia Vallette and Mr. Quinlan's death.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/19/2020	GCG	Email to AX and team re death of named plaintiff.	0.1	
7/19/2020	BBK	Reviewing AX update re death of named Plaintiff L. Quinlan and plan for finalizing discovery responses w/ his granddaughter and GAL.	0.1	
7/19/2020	JSY	Emails re death of class rep.	0.1	
7/20/2020	GCG	(Billing Judgment) Email to team re Covid-19 regulatory change for assisted living.	0.0	0.1
7/20/2020	GCG	Email to AX and team re summary of discovery response status.	0.1	
7/20/2020	BBK	Conferring by email w/ P. Lindstrom re additional responsive documents.	0.1	
7/20/2020	BBK	Preparing for co-counsel call re discovery responses.	0.2	
7/20/2020	BBK	Participating in co-counsel Zoom call re discovery responses.	0.4	
7/20/2020	BBK	Revising Lindstrom RFP Responses and sharing w/ team.	1.0	
7/20/2020	BBK	Reviewing additional responsive documents rec'd from P. Lindstrom and updating RFP Response draft accordingly.	0.2	
7/20/2020	BBK	Reviewing AX notes from co-counsel Zoom call on discovery responses.	0.1	
7/20/2020	AX	Meeting with Brookdale cocounsel re: discovery issues (.4); revise notes and circulate to team (.2).	0.6	
7/20/2020	JSY	Meeting re ROG and RFP responses.	0.5	
7/21/2020	AX	Send email to Loresia Vallette re: Mr. Quinlan's death.	0.1	
7/22/2020	JSY	Emails re class member.	0.1	
7/23/2020	GCG	Email GW re status.	0.1	
7/23/2020	BBK	Reviewing intake from daughter of former resident of a Brookdale Memory Care facility.	0.1	
7/24/2020	GCG	Emails to MJ re discovery statement.	0.1	
7/24/2020	GCG	Email to potential class member re mother's death.	0.1	
7/24/2020	BBK	Reviewing outreach from son of former BD memory-care resident who passed away and GCG response email.	0.1	
7/24/2020	BBK	Reviewing GCG-M. Johnson emails re status of joint discovery statement to file in advance of 7/31 discovery conference before MJ Beeler.	0.1	
7/27/2020	GCG	Review joint discovery statement.	0.1	
7/27/2020	GCG	Emails to MJ and JM re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/27/2020	BBK	Reviewing draft joint discovery statement to file in advance of 7/30 discovery conference.	0.3	
7/28/2020	BBK	Reviewing M. Johnson update re receipt of ESI search terms from opposing counsel and need to analyze & comment thereon; reviewing G. Wallace update re review of draft ROG Responses.	0.1	
7/29/2020	GCG	Review joint discovery statement and related pleadings.	0.5	
7/29/2020	GCG	Conf w/ and email to MJ re hearing before Judge Beeler.	0.2	
7/29/2020	GCG	Email to GW and team re interrogatory responses.	0.1	
7/30/2020	GCG	Participate in discovery hearing before Judge Beeler.	1.7	
7/30/2020	GCG	Review discovery pleadings in preparation for hearing.	0.5	
7/30/2020	GCG	Review draft expert report.	0.2	
7/30/2020	GCG	Conf w/ GW re discovery hearing and need for discovery master.	0.2	
7/30/2020	KES	Download and circulate pleading and clerk notice.	0.1	
7/31/2020	GCG	Participate in team call re discovery conference and plaintiffs' discovery responses.	0.4	
7/31/2020	BBK	Reviewing 7/30 discovery order addressing issues post discovery conference.	0.1	
7/31/2020	AX	Brookdale weekly meeting.	0.3	
7/31/2020	KES	Download and circulate pleadings.	0.2	
7/31/2020	KES	(Reduced Charge) Team meeting to discuss discovery responses and other case issues.	0.4	0.1
8/3/2020	GCG	Emails to GW and team re revisions to draft discovery responses.	0.2	
8/3/2020	BBK	Reviewing update from G. Wallace re comments/revisions for draft Rog Responses and discussion among team.	0.1	
8/3/2020	AX	Team correspondence re: discovery responses.	0.2	
8/3/2020	AX	Correspondence w/ GCG re: remedies memo.	0.1	
8/3/2020	AX	Review GW comments on draft interrogatory answers for various plaintiffs.	0.8	
8/3/2020	AX	Team correspondence re: Brookdale San Juan resident and request for referral.	0.1	
8/3/2020	JSY	Emails re ROG responses.	0.1	
8/3/2020	JSY	Emails re meeting re ROG responses.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/3/2020	KES	Telephone conference with relative of Brookdale resident re understaffing and other issues related to those in complaint; email team re same and re request for further recommendation for follow up and email contact re resources for urgent issues; online research re same.	1.3	
8/4/2020	GCG	Participate in Zoom meeting to discuss plaintiffs' discovery responses and revisions thereto.	0.9	
8/4/2020	GCG	Email to GW and team re same.	0.1	
8/4/2020	JSY	Meeting to discuss ROG responses.	0.7	
8/4/2020	JSY	Edit ROG responses.	2.3	
8/4/2020	BBK	Reviewing G. Wallace comments on draft Rog Responses.	0.5	
8/4/2020	BBK	Participating in co-counsel Zoom meeting re revising/finalizing RFP and ROG responses.	0.7	
8/4/2020	AX	Review GW revisions on draft interrogatories for team (.7); team strategy meeting re: completing discovery responses (.8).	1.5	
8/4/2020	AX	Review Guy Wallace comments on draft interrogatory responses (.5); revise Lawrence Quinlan interrogatory response and draft email with questions to Loresia Vallette (1.3).	1.8	
8/4/2020	JSY	Emails re meeting to discuss ROG responses.	0.1	
8/4/2020	KES	Gather client documents related to residency agreement and PSP in connection with preparation of discovery responses.	0.8	
8/5/2020	JSY	Emails re ROG responses.	0.2	
8/5/2020	JSY	Edit same.	3.3	
8/5/2020	BBK	Conferring w/ JSY, AX, and G. Wallace re revisions to ROG responses.	0.1	
8/5/2020	BBK	Conferring w/ JSY, AX, and KES re revisions to ROG responses and identifying key docs to cite.	0.2	
8/5/2020	BBK	Drafting/sending FU email to P. Lindstrom re completing ROG Responses and signing verification.	0.1	
8/5/2020	BBK	Reviewing M. Johnson - D. Marks emails re Kronos data; reviewing M. Johnson update to opposing counsel re ESI search terms.	0.1	
8/5/2020	BBK	Revising Lindstrom ROG Responses.	1.7	
8/5/2020	AX	Team correspondence re: draft discovery responses (.3); correspondence w/ Loresia Vallette (.2).	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/5/2020	AX	Revise Bernie Jestrabek-Hart interrogatory responses with feedback from GW, including incorporating feedback from BJH (3.2), draft email to client (.3).	3.5	
8/5/2020	AX	Team correspondence re: residency agreements and personal service agreements as related to discovery responses.	0.1	
8/5/2020	AX	Review documents and incorporate into discovery responses.	0.2	
8/5/2020	AX	Review GW paragraph on access issues and incorporate into discovery responses.	0.2	
8/5/2020	AX	Read team correspondence re: proposed ESI search terms.	0.1	
8/5/2020	KES	Gather documents related to PSPs and residency agreements for Algarme, Lindstrom, Jestrabek-Hart, and Carlson in connection with preparation of discovery responses.	0.9	
8/6/2020	GCG	Conf w/ JSY and email GW re interrogatory responses.	0.2	
8/6/2020	GCG	Review client report on understaffing issues and long waits for care.	0.1	
8/6/2020	BBK	Conferring w/ co-counsel re proposed revisions to Lindstrom ROG Resps.	0.2	
8/6/2020	BBK	Conferring w/ co-counsel & AX re Quinlan ROG responses; comm'ns w/ team re verifications.	0.1	
8/6/2020	BBK	Conferring by email w/ J. Carlson re finalizing Rog Responses and scheduling call to go over them and sign verification.	0.1	
8/6/2020	AX	Email correspondence w/ BJH re: Brookdale interrogatory responses and RFPs.	0.4	
8/6/2020	AX	Review documents from BJH re: same.	0.5	
8/6/2020	AX	Call w/ Loresia Vallette re: interrogatory responses and RFPs.	0.8	
8/6/2020	AX	Revise interrogatory responses pursuant to conversation and send to LV.	1.5	
8/6/2020	JSY	Finalize ROG responses; send same to ML; emails with client re same.	0.8	
8/6/2020	AX	Email correspondence w/ team re: death certificates and successor in interest.	0.2	
8/6/2020	AX	Email correspondence w/ GW and team re: Loresia Vallette emails for production.	0.4	
8/6/2020	AX	Email correspondence w/ LV re: Brookdale emails and gmail searches.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/7/2020	GCG	Emails to GW and team re next call and serving interrogatory responses.	0.2	
8/7/2020	BBK	Emails re Lindstrom ROG Responses.	0.2	
8/7/2020	BBK	Reviewing JSY and AX updates re ROG Responses.	0.1	
8/7/2020	AX	Email correspondence w/ team re: production of plaintiffs' documents (.2); draft responses to defs document requests (1.5).	1.7	
8/7/2020	AX	Email correspondence w/ team re: signed verification and document production (.1); email correspondence re: notice of appearance (.1).	0.2	
8/7/2020	JSY	Finalize JA ROG responses; conf. w/ JA re same.	1.5	
8/10/2020	BBK	Revisions to P. Lindstrom's Interrogatory responses.	0.4	
8/10/2020	BBK	Conferring by phone w/ P. Lindstrom re Response.	0.1	
8/10/2020	BBK	Conferring w/ co-counsel and JSY/AX re review of RFP Responses.	0.2	
8/10/2020	BBK	Conferring w/ RBGG legal team re discovery response service.	0.1	
8/10/2020	BBK	Drafting Carlson Rog Responses.	1.3	
8/10/2020	AX	Call w/ JY re: discovery issues.	0.1	
8/10/2020	AX	Correspondence w/ team re: residency agreements.	0.1	
8/10/2020	AX	Correspondence w/ team re: serving discovery logistics.	0.2	
8/10/2020	AX	Finalize Algarme draft objections.	0.5	
8/10/2020	AX	Email w/ JY re: docusign.	0.1	
8/10/2020	JSY	Edit discovery responses; emails re same; conf. w/ AX re same.	0.4	
8/10/2020	AX	Draft responses to requests for production for Bernie Jestrabek Hart and Loresia Vallette; review documents on Relativity.	5.5	
8/10/2020	KES	Emails with team re finalization and service of discovery responses.	0.2	
8/10/2020	KES	Continue client file review to confirm all documents uploaded to Relativity ahead of discovery response deadline.	0.9	
8/11/2020	GCG	Email to GW re discovery.	0.1	
8/11/2020	BBK	Updating Plaintiffs' counsel team re: plan for finalizing Carlson ROG Responses.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/11/2020	BBK	Conferring w/ J. Carlson re scheduling call to finalize ROG Responses and sign verification.	0.1	
8/11/2020	BBK	Conferring w/ JSY/AX re verifications for ROG Responses.	0.1	
8/11/2020	BBK	Conferring w/ team re plan for and status of document production.	0.1	
8/11/2020	BBK	Reviewing M. Johnson - G. Maatman meet and confer communications and M. Johnson M&C letter re KRONOS data.	0.1	
8/11/2020	BBK	Preparing verification for Lindstrom ROG Responses.	0.3	
8/11/2020	BBK	Preparing verification for Carlson ROG Responses.	0.3	
8/11/2020	BBK	Preparing Carlson ROG Responses (including drafting and analyzing documents & client notes).	7.5	
8/11/2020	AX	Email w/ KS re: notice of appearance.	0.1	
8/11/2020	AX	Emails w/ Loresia Vallette re: interrogatories.	0.1	
8/11/2020	AX	Revise and send draft RFP responses to cocounsel.	0.7	
8/11/2020	AX	Email to team re: Relativity documents.	0.2	
8/11/2020	AX	Revise and send draft interrogatory responses to cocounsel.	0.8	
8/11/2020	AX	Email correspondence w/ Bernie Jestrabek-Hart.	0.3	
8/11/2020	JSY	Emails re ROG and RFP responses.	0.2	
8/11/2020	KES	Draft notice of appearance for AX.	0.2	
8/11/2020	KES	Review updated DSS information for Brookdale Brookhurst facility.	0.1	
8/11/2020	KES	Emails re status of client document upload to Relativity.	0.1	
8/12/2020	GCG	Conf w/ and email to AX re discovery responses.	0.1	
8/12/2020	BBK	Conferring by phone w/ P. Lindstrom re finalizing ROG Responses and signing verification.	0.4	
8/12/2020	BBK	Revising Lindstrom ROG Responses per call w/ P. Lindstrom.	0.3	
8/12/2020	BBK	Drafting/sending email to G. Wallace and Plaintiffs' counsel team re Lindstrom ROG responses.	0.1	
8/12/2020	BBK	Finalizing Lindstrom ROG Responses.	0.2	
8/12/2020	BBK	Preparing Carlson Rog Responses.	6.1	
8/12/2020	BBK	Preparing Carlson Rog Responses for client review and drafting/sending instructions to J. Carlson.	0.4	
8/12/2020	BBK	Drafting Carlson RFP Responses and sharing w/ team.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/12/2020	BBK	Conferring w/ AX and M. Johnson re plan for reviewing/finalizing RFP Responses for all clients.	0.1	
8/12/2020	AX	Call w/ GCG re: case tasks.	0.1	
8/12/2020	AX	Call w/ KS re: case tasks.	0.2	
8/12/2020	AX	Call w/ Bernie Jestrabek Hart re: finalizing interrogatory responses.	0.6	
8/12/2020	AX	Call Loresia Vallette re: finalizing interrogatory responses.	0.1	
8/12/2020	AX	(Billing Judgment) Call w/ AA re: formatting interrogatory responses.	0.0	0.1
8/12/2020	AX	(Billing Judgment) Emails w/ CG and AA re: formatting interrogatory responses and case tasks.	0.0	0.2
8/12/2020	AX	Email to cocounsel re: GW edits on interrogatory responses.	0.2	
8/12/2020	AX	Review and accept GW edits to interrogatory responses.	0.7	
8/12/2020	AX	Send Docusign verifications to Bernie Jestrabek-Hart and Loresia Vallette.	0.4	
8/12/2020	AX	Send email to cocounsel re: RFP responses.	0.3	
8/12/2020	JSY	Emails re discovery responses.	0.1	
8/12/2020	KES	Finalize and file Notice of Appearance for AX.	0.3	
8/12/2020	KES	Update master caption and email team re same.	0.2	
8/12/2020	KES	Review status of discovery responses.	0.1	
8/13/2020	GCG	Confs w/ BBK and AX and emails to team re plaintiffs' discovery responses.	0.5	
8/13/2020	GCG	Review MJ letter and emails re ESI dispute.	0.2	
8/13/2020	BBK	Conferring w/ co-counsel and RBGG team re RFP Response.	0.2	
8/13/2020	BBK	Revising Carlson Rog Responses and preparing FU questions/updates for call w/ J. Carlson to finalize and sign verification.	1.2	
8/13/2020	BBK	Conferring by email w/ RBGG team re plan for finalizing/serving discovery responses.	0.1	
8/13/2020	BBK	Conferring by phone w/ GCG re plan for finalizing/serving discovery responses.	0.1	
8/13/2020	BBK	Conferring w/ J. Carlson re review of Rog Responses.	0.1	
8/13/2020	BBK	Reviewing M. Johnson report to team re meet and confer w/ Ds re Kronos data.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/13/2020	BBK	Conferring by phone w/ J. Carlson to finalize Rog Responses and sign verification.	1.0	
8/13/2020	BBK	Revising Carlson & Lindstrom RFP Responses.	1.9	
8/13/2020	AX	Make revisions to BJH and LV responses to RFP.	3.0	
8/13/2020	AX	Email correspondence w/ team re: finalizing draft RFP and interrogatory responses.	0.5	
8/13/2020	AX	Email correspondence w/ BJH and LV re: finalized discovery responses.	0.4	
8/13/2020	JSY	Edit RFP responses.	1.0	
8/13/2020	FGL	(Billing Judgment) Email from/to BBK re Carlson discovery response (.1); format/finalize same, including attachment of verification (.1).	0.0	0.2
8/13/2020	FGL	(Billing Judgment) Email from/to AX re Schmidt discovery response (39 pages) from co-counsel and on co-counsel's template (.1); format same to conform with RBGG template and finalize, including attachment of verification (1.4).	0.0	1.5
8/13/2020	KES	Review emails re status of discovery responses.	0.2	
8/14/2020	GCG	Confs w/ AX and emails to team re final revisions to plaintiffs' discovery responses.	0.8	
8/14/2020	GCG	(Billing Judgment) Oversee service of same.	0.0	0.3
8/14/2020	BBK	Conferring w/ RBGG team re finalizing/serving discovery responses.	0.5	
8/14/2020	BBK	Revising/finalizing Lindstrom RFP Responses.	0.8	
8/14/2020	BBK	Revising/finalizing Carlson RFP Responses.	0.9	
8/14/2020	BBK	Conferring w/ M. Johnson re Stiner Rog Responses and RFP Responses; verification.	0.3	
8/14/2020	BBK	Attending to revising/finalizing Stiner Rog Responses.	1.2	
8/14/2020	BBK	Conferring w/ KES re Stiner personal assessments.	0.1	
8/14/2020	AX	Email correspondence w/ team re: revisions to responses to RFPs and finalizing discovery responses.	1.2	
8/14/2020	AX	Call w/JY re: same.	0.3	
8/14/2020	AX	(Billing Judgment) Call w/AA re: same.	0.0	0.1
8/14/2020	JSY	Edit and finalize discovery.	3.5	
8/14/2020	AX	Coordinating discovery responses.	2.2	
8/14/2020	AX	Review MJ comments on RFPs.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/14/2020	AX	Phone call w/ JY.	0.3	
8/14/2020	AX	(Billing Judgment) phone call w/ AA.	0.0	0.1
8/14/2020	AX	Phone call w/ KS.	0.2	
8/14/2020	AX	Phone call w/ MJ.	0.2	
8/14/2020	AX	Phone call w/ MJ.	0.1	
8/14/2020	AX	Phone call w/ GCG.	0.1	
8/14/2020	AX	Phone call w/ MJ.	0.1	
8/14/2020	AX	Phone calls w/ MJ.	0.3	
8/14/2020	AX	Phone calls w/ KS.	0.5	
8/14/2020	AX	Review and finalize BJH and LV interrogatory responses, RFP responses.	1.3	
8/14/2020	KES	Review and gather documents from Relativity related to Stiner PSP in connection with preparation of discovery responses.	0.4	
8/14/2020	KES	Review plaintiffs' final discovery responses and prepare proofs of service and confirm signatures for each; confer team re logistics.	3.0	
8/14/2020	KES	Revise Stiner responses to RPDs; prepare POS for M. Johnson and email final drafts pending client approval.	2.5	
8/14/2020	KES	Draft email and serve defendants with plaintiff discovery responses.	0.4	
8/15/2020	GCG	Research re Brook financial status in light of Covid-19.	0.1	
8/17/2020	GCG	Conf w/ BBK and email to MJ re document review and production.	0.1	
8/17/2020	BBK	Drafting/sending emails to J. Carlson and P. Lindstrom enclosing Rog Responses.	0.1	
8/17/2020	BBK	Reviewing M. Johnson FU w/ team re preparing document production for Ds; conferring w/ KES re follow-up w/ Schneider Wallace re ensuring all docs from our clients we provided are uploaded to Relativity and ready for marking for redaction/privilege.	0.1	
8/18/2020	KES	Continue cross-check of client documents uploaded to Relativity in preparation for document production.	0.8	
8/18/2020	EH	(Billing Judgment) saved to file and circulated to team article re Brookdale facilities.	0.0	0.3
8/19/2020	GCG	Conf w/ BBK and emails to team re review and preparation of plaintiffs' documents for production.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/19/2020	BBK	Conferring w/ RBGG Brookdale team re plan for doc analysis for privilege prior to production.	0.3	
8/19/2020	BBK	Reviewing/commenting on KES export of client docs.	0.2	
8/19/2020	JSY	Emails re documents from clients.	0.1	
8/19/2020	KES	Review status of client documents in Relativity, export and organize spreadsheet of documents relating to each plaintiff, and emails with team re documents status and review and other production issues.	2.5	
8/20/2020	BBK	Conferring w/ RBGG team re redactions for document production.	0.2	
8/20/2020	BBK	Reviewing M. Johnson - G. Maatman communications re meet and confer re responses to Ps' Interrogatories re construction/alterations for BD facilities; reviewing update from plaintiff re evacuation of BD Scotts Valley facility due to fires.	0.1	
8/20/2020	AX	Review emails and correspondence re: production of documents (.3); correspondence w/ BJH and LV re: documents (.2).	0.5	
8/20/2020	JSY	Emails re document production from clients.	0.1	
8/21/2020	GCG	Emails re plaintiffs' doc production.	0.1	
8/21/2020	BBK	Conferring w/ RBGG team re status docs needed to be analyzed for privilege review.	0.1	
8/21/2020	AX	Email correspondence to BJH.	0.1	
8/23/2020	AX	Review team correspondence re: discovery of plaintiffs' documents; coordinate meeting time w/ team.	0.2	
8/24/2020	BBK	Conferring w/ BD team re timeframe for document production.	0.1	
8/24/2020	BBK	Conferring w/ KES re status and timeframe for ensuring all client documents uploaded to Relativity for privilege review/redactions prior to doc production.	0.1	
8/24/2020	BBK	Participating in co-counsel call re document production.	0.8	
8/24/2020	AX	Correspondence w/ team re: document production (.2); team strategy meeting re: document production (.6).	0.8	
8/24/2020	KES	Confirm all client documents uploaded to Relativity and email co-counsel re a few additional documents.	1.0	
8/25/2020	KES	Follow up re transcript of 7/30 hearing.	0.1	
8/25/2020	EH	Call with daughter of memory care resident at Brookdale Oceanside.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/25/2020	EH	Organized memo to file re call with daughter of memory care resident at Brookdale Oceanside; routed same to team.	0.6	
8/25/2020	EH	Corresponded with relative of memory care resident at Brookdale oceanside re residency agreements and signing of arbitration agreement.	0.3	
8/26/2020	GCG	Emails to RS and team re putative class member declaration ISO class cert.	0.2	
8/26/2020	GCG	Email to JSY, BBK and MJ re search terms.	0.1	
8/26/2020	GCG	Conf w/ JSY re document review and production.	0.1	
8/26/2020	BBK	Conferring w/ R. Bonner re document analysis for redactions/privileges prior to rolling production.	0.1	
8/26/2020	BBK	Reviewing/commenting on M. Johnson's draft ESI search terms to propose to Defendants (including conferring w/ JSY and GCG re this).	0.2	
8/26/2020	JSY	Conf. w/ GCG re doc production issues and search terms; emails re same.	0.3	
8/27/2020	GCG	Conf w/ EH re potential class member declaration ISO class cert.	0.1	
8/27/2020	GCG	Emails to JSY, MJ and BBK re doc production.	0.1	
8/27/2020	BBK	Reviewing JSY-M.Johnson communications re work product protection for documents.	0.1	
8/27/2020	BBK	Drafting/sending question to co-counsel re our position of redactions of email addresses, physical addresses and phone numbers of third parties.	0.1	
8/27/2020	BBK	Analyzing Carlson documents for production, redactions and privilege.	2.2	
8/27/2020	BBK	Drafting/sending report to R. Bonner and team re Carlson document production plan.	0.3	
8/27/2020	EH	Call with GCG re declarations for class certification and discovery tasks.	0.1	
8/27/2020	EH	Scheduling calls with potential declarants ISO motion for class certification and calendared same.	0.5	
8/27/2020	EH	Compiled and organized to file 2017 client documents for potential declarant in support of motion for class certification.	0.4	
8/28/2020	GCG	Email to MJ and TC re transcript request.	0.1	
8/28/2020	GCG	Emails to MJ and team and conf w/ BBK re document review and production.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/28/2020	BBK	Reviewing R. Bonner update re having Stiner and Carlson docs prepared for first tranche of production.	0.1	
8/28/2020	BBK	Reviewing/commenting on doc production.	0.3	
8/28/2020	BBK	Conferring by email w/ R. Bonner, M. Johnson and B. Umpierre re redactions, metadata, and custodian info for production of documents.	0.2	
8/31/2020	GCG	Prepare for call w/ witness.	0.2	
8/31/2020	GCG	Review emails to RB, BBK and team re production of plaintiffs' documents.	0.1	
8/31/2020	GCG	Email to GW re call.	0.1	
8/31/2020	GCG	Email to expert witness re report.	0.1	
8/31/2020	GCG	Email to team re transcript.	0.1	
8/31/2020	BBK	Reviewing/approving final set of Carlson documents prepared for document production to Ds.	0.5	
8/31/2020	BBK	Conferring w/ M. Johnson and R. Bonner re finalizing first tranche of rolling production of docs.	0.2	
8/31/2020	BBK	Conferring w/ RBGG team re status of preparing client docs for next round of rolling doc production.	0.1	
9/1/2020	GCG	Conf w/ JSY re document review.	0.1	
9/1/2020	GCG	Conf w/ potential witness and EH re declaration ISO class cert.	0.2	
9/1/2020	GCG	Attend to expert emails and share Brook article w/ team and JG.	0.2	
9/1/2020	BBK	Reviewing transcript of 7/30 discovery hearing.	0.2	
9/1/2020	BBK	Reviewing report from R. Bonner re finalizing/producing first tranche of rolling doc production.	0.1	
9/1/2020	AX	Call w/ JSY re: review of documents for production.	0.3	
9/1/2020	JSY	Emails and calls re document review of client documents.	0.3	
9/1/2020	KES	Emails with team re initial documents provided by MH.	0.2	
9/1/2020	EH	Call with GCG and potential putative class member regarding experiences at Brookdale memory care facility.	0.3	
9/1/2020	EH	Corresponding with putative class member regarding declaration for class cert and residency agreement.	0.2	
9/2/2020	GCG	Emails to EH and team re drafting declarations ISO class cert.	0.2	
9/2/2020	GCG	Email to MH re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/2/2020	BBK	Conferring w/ team re draft class member declaration and FU w/ putative class member.	0.1	
9/2/2020	AX	Review documents for BJH re: production (1.3); draft email w/ questions to cocounsel re: Relativity redactions (.2).	1.5	
9/2/2020	JSY	Review client documents.	1.0	
9/2/2020	EH	Drafted declaration in support of motion for class certification re experiences of resident at Brookdale Oceanside Memory Care.	3.3	
9/3/2020	GCG	Email to AX and team re potential declaration.	0.1	
9/3/2020	GCG	Email to GM and MT re interrogatory responses.	0.1	
9/3/2020	AX	Review Bernie Jestrabek Hart documents for production (.6); and draft email to Ryan Bonner re: redactions, and attorney-client privilege (.4).	1.0	
9/3/2020	EH	Organized to file case research.	0.1	
9/4/2020	GCG	Team meeting to discuss plaintiffs' document production and class cert declarations.	0.3	
9/4/2020	GCG	Email to GW re class cert plan.	0.1	
9/4/2020	GCG	Email to MJ and GM re amending discovery responses.	0.1	
9/4/2020	AX	Team strategy meeting.	0.3	
9/4/2020	JSY	Team meeting.	0.3	
9/4/2020	JSY	Review client documents;' emails re same.	1.8	
9/4/2020	EH	Conference with team re case issues and class cert.	0.3	
9/8/2020	BBK	Reviewing M. Johnson - opposing counsel communications re meet and confer over Ds' response to Interrogatories and RFPs seeking info and docs re construction/alterations to comply w/ ADA.	0.1	
9/8/2020	BBK	Conferring w/ co-counsel and RBGG team re doc production for clients and following consistent positions on redactions, confidentiality designations, and privilege assertions.	0.2	
9/8/2020	AX	Correspondence w/ BBK and JY re: document production.	0.2	
9/8/2020	JSY	Review client documents; emails re same.	1.0	
9/9/2020	BBK	Reviewing KES report re call from family member of BD Scotts Valley resident and potential for class cert declaration.	0.1	
9/9/2020	BBK	Reviewing JSY-R. Bonner communications re finalizing supplemental document production for 9/10.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/9/2020	BBK	Conducting analysis of Lindstrom docs for production to ID responsiveness, redactions and privilege.	1.3	
9/9/2020	AX	Email correspondence re: BJH documents; review BJH document set to ensure revisions to redactions were made.	0.4	
9/9/2020	JSY	Final review of Algarme document production.	0.6	
9/9/2020	KES	Telephone conference with relative of Brookdale resident; review information sent by same; email team re same.	0.7	
9/10/2020	BBK	Analyzing Lindstrom documents for upcoming production for responsiveness, privilege withholdings, and redactions needed and updating Relativity accordingly.	3.4	
9/10/2020	BBK	Drafting/sending update to R. Bonner re next steps for Lindstrom doc production.	0.2	
9/10/2020	JSY	Emails re Brookhurst.	0.1	
9/15/2020	GCG	Emails RS - team regarding putative class member declarations.	0.1	
9/15/2020	GCG	Emails MJ - GW- JM regarding expert report and search terms for ESI.	0.1	
9/15/2020	GCG	Emails JSY - team regarding Plaintiff's document production.	0.1	
9/15/2020	BBK	Reviewing communications w/ co-counsel re class cert declarations; conferring w/ RBGG team re status of preparing client doc productions.	0.1	
9/15/2020	BBK	Reviewing proposed letter to Ds re ESI search terms and custodians; reviewing opposing counsel updates re serving amended discovery responses.	0.1	
9/15/2020	JSY	Emails re document review.	0.1	
9/16/2020	BBK	Reviewing communications w/ opposing counsel re discovery production issues and amended discovery responses.	0.1	
9/16/2020	AX	Review documents for Loresia Vallette/Lawrence Quinlan; email correspondence w/ team re: declarations.	0.6	
9/17/2020	AX	Review correspondence w/ team.	0.2	
9/18/2020	BBK	Reviewing/responding to M. Johnson email re preparing discovery letter responding to Ds' ltr seeking M&C on our responses to RFPs.	0.1	
9/21/2020	GCG	Conference and emails with RS and AX regarding declarations of putative class members in support of class certification.	0.5	
9/21/2020	GCG	Email GW and MJ regarding class certification motion.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/21/2020	BBK	Reviewing AX update re meeting w/ GCG and R. Steyer re obtaining class member declarations for cert and commenting on class cert motion plans.	0.1	
9/21/2020	AX	Zoom conference w/ GCG and RS re: class member declaration and review process.	1.0	
9/21/2020	AX	Draft summary email to team.	0.3	
9/21/2020	AX	Phone call w/ GCG re: same.	0.1	
9/22/2020	BBK	Reviewing/responding to M. Johnson query re documents re separate facilities.	0.1	
9/22/2020	BBK	Reviewing M. Johnson report on status of Brookdale's doc production to date.	0.1	
9/22/2020	JSY	Emails and texts with JA re fall.	0.1	
9/22/2020	KES	Emails with team re initial production of client files.	0.2	
9/23/2020	BBK	Reviewing M. Johnson M&C letter to Ds re their objections to our responses to RFPs.	0.1	
9/23/2020	BBK	Reviewing JSY update re call w/ J. Algarme.	0.1	
9/23/2020	JSY	T/C with JA; emails re same.	0.5	
9/25/2020	GCG	Email GW and MJ regarding motion to compel and motion for additional time for class certification.	0.1	
9/28/2020	BBK	Reviewing M. Johnson letter to Ds re case schedule in light of ongoing discovery disputes and delays.	0.1	
9/29/2020	BBK	Reviewing Ds' response to M. Johnson meet and confer letter re Ds' objections to Ps' Responses to RFPs.	0.1	
9/30/2020	GCG	Conference with AX regarding class member declaration.	0.1	
9/30/2020	GCG	Review emails with GM - MJ regarding document production and class certification schedule.	0.1	
10/1/2020	GCG	Review and revise stipulation to extend class cert schedule.	0.2	
10/1/2020	GCG	Emails to MJ and GW re same and re prior scheduling orders.	0.1	
10/1/2020	BBK	Reviewing communications w/ opposing counsel re stipulating to extend class cert deadline.	0.1	
10/2/2020	GCG	Email to GM and MJ re stipulation and order re class cert motion.	0.1	
10/2/2020	BBK	Reviewing proposed redline to stipulation to extend class cert deadline six months by M. Johnson and opposing counsel's comments thereon.	0.1	
10/2/2020	AX	Review plaintiffs' document sets for production; draft summary email to team.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/2/2020	AX	Review team correspondence re: stipulation and scheduling order.	0.4	
10/4/2020	BBK	Conferring w/ co-counsel re status of Ps' doc production.	0.1	
10/5/2020	JSY	Review Lytle/Boris documents for production; emails re same.	2.0	
10/5/2020	FGL	Email from/to AX re declaration of L. Vallette per CCP 377.32 (.1); draft same (.1).	0.2	
10/6/2020	BBK	Conferring w/ team re preparing Ps' docs for production.	0.1	
10/6/2020	BBK	Reviewing meet and confer communications w/ opposing counsel re stipulating to extend time for class cert motion and Ds' request to add deadline to add parties/amend pleadings and for early expert disclosures.	0.1	
10/7/2020	GCG	Review team emails re plaintiffs' document production.	0.1	
10/7/2020	GCG	Review plaintiffs' revisions to class cert stipulation and order.	0.1	
10/7/2020	BBK	Conferring w/ team re responding to family-member of putative class member's intake.	0.1	
10/7/2020	BBK	Conducting analysis of P. Lindstrom docs prepared for production and identifying privilege and redaction issues needed; drafting/sending additional corrections to R. Bonner.	1.7	
10/7/2020	AX	Email correspondence w/ team re: memory care class member and outreach.	0.1	
10/7/2020	AX	Email correspondence w/ team re: plaintiffs' document production.	0.1	
10/7/2020	AX	Review Lawrence Quinlan production set for production and draft email to cocounsel team.	0.8	
10/7/2020	JSY	Review client documents; emails with team re same.	0.8	
10/7/2020	KES	Review case inquiry from relative of Brookdale resident; review files and prior communications with relative and email team re same for follow up.	1.2	
10/8/2020	GCG	Email to GW and MJ re call.	0.1	
10/8/2020	GCG	Conf w/ JSY re declaration and document production.	0.1	
10/8/2020	JSY	Conf. w/ GCG re status and document production; emails re same.	0.2	
10/9/2020	GCG	Team meeting re class member declarations and document production.	0.3	
10/9/2020	GCG	Review email from MJ re class members' disabilities.	0.1	
10/9/2020	BBK	Conferring w/ RBGG team and co-counsel re identifying docs that support named Ps' disabilities.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/9/2020	BBK	Participating in RBGG team Zoom meeting on case tasks.	0.3	
10/9/2020	AX	Team strategy meeting.	0.3	
10/9/2020	JSY	Emails re document production and meeting; review client documents.	0.3	
10/9/2020	JSY	(Reduced Charge) Team meeting.	0.3	0.1
10/9/2020	EH	Organized to file all correspondence re case issues from resident at Brookdale Redwood City.	0.6	
10/9/2020	EH	Conference re outstanding discovery requests and declarations in support of motion for class cert.	0.3	
10/12/2020	GCG	Prepare for and conduct call w/ MJ and GW re various tasks needed to prepare motion for class cert.	0.5	
10/12/2020	GCG	Email to team re same and privilege log.	0.1	
10/12/2020	AX	Email communication w/ team re: case tasks.	0.2	
10/13/2020	BBK	Reviewing GCG update re next steps w/ case and communications w/ EH and AX re class member declarations and preparing privilege log.	0.1	
10/14/2020	BBK	Reviewing/approving doc production for P. Lindstrom docs.	0.1	
10/16/2020	GCG	Email to MJ and GW re Defendants' revisions to class cert stipulation.	0.2	
10/16/2020	BBK	Reviewing communications w/ co-counsel re stipulation to extend class cert deadline.	0.1	
10/19/2020	GCG	Emails re finalizing and filing stipulation and proposed order re class cert schedule.	0.2	
10/19/2020	BBK	Reviewing comm'ns w/ opposing counsel reaching agreement on stip for EOT on class cert motion and setting briefing schedule and filing of stip; reviewing comm'ns w/ co-counsel re plan for preparing privilege logs.	0.1	
10/19/2020	AX	Emails w/ team re: privilege logs for communications w/ putative class members.	0.5	
10/19/2020	AX	Email to Bernie Jestrabek-Hart re: current status.	0.2	
10/19/2020	FFV	(Billing Judgment) Email to the team re stipulation.	0.0	0.2
10/19/2020	KES	Download and circulate stipulation.	0.1	
10/20/2020	GCG	Emails w/ team re court order for CMC.	0.1	
10/20/2020	BBK	Reviewing notice of CMC by Judge Gilliam in response to stipulation for EOT on class cert motion.	0.1	
10/20/2020	KES	Download and circulate order and calendar CMC.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/21/2020	GCG	Review memo to file re burn suffered by named plaintiff at Brookdale facility; email to team re same.	0.1	
10/21/2020	BBK	Reviewing update from J. Algarme re Brookdale problems.	0.1	
10/21/2020	JSY	T/C with JA re burn issue; draft memo to team re same; emails re same.	0.6	
10/22/2020	KES	Review hard copy documents and route to files.	0.3	
10/23/2020	GCG	Email to GW re preparation for CMC and email from KES re potential declarant.	0.1	
10/23/2020	KES	Review prior communications with relative of Brookdale resident.	0.3	
10/26/2020	GCG	Conf w/ GW and MJ re preparation for hearing.	0.5	
10/26/2020	GCG	Review discovery communications.	0.4	
10/26/2020	GCG	Conf w/ and email to KES re case docket and previous hearing.	0.2	
10/26/2020	JSY	Emails re JA injury.	0.1	
10/26/2020	KES	Gather materials in preparation for hearing.	0.2	
10/27/2020	GCG	Participate in case management conference re class certification stipulation.	0.9	
10/27/2020	GCG	Follow up call w/ GW and MJ.	0.1	
10/27/2020	GCG	Draft and circulate memo to file re court's remarks on record.	0.2	
10/27/2020	SJR	(Billing Judgment) Email from GG re status.	0.0	0.1
10/27/2020	BBK	Reviewing GCG report re hearing re stip for EOT to file class cert motion.	0.1	
10/28/2020	SJR	(Billing Judgment) Email update from GG.	0.0	0.1
10/28/2020	BBK	Reviewing Court Order entering Stip for EOT for class cert motion & briefing schedule.	0.1	
10/28/2020	BBK	Reviewing Ds' meet and confer letter re ESI search terms.	0.1	
10/28/2020	BBK	Reviewing Ds' meet and confer letter re Ps' interrogatory responses.	0.1	
10/28/2020	AX	Review correspondence from opposing counsel re: discovery issue.	0.2	
10/28/2020	KES	(Reduced Charge) Download and circulate Order and calendar new class cert deadlines.	0.3	0.3
10/29/2020	AX	Review email correspondence from opposing counsel re: m&c.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2020	BBK	(Billing Judgment) Conferring w/ RBGG team re re-scheduling team meeting.	0.0	0.1
11/2/2020	GCG	Team meeting to discuss class member issues and declarations.	0.4	
11/2/2020	GCG	Email to GW and GM re meet and confer re plaintiff's discovery responses.	0.1	
11/2/2020	JSY	Team meeting.	0.4	
11/2/2020	JSY	Call with JA brother re JA injury.	0.2	
11/2/2020	JSY	Emails with team re same.	0.1	
11/2/2020	BBK	Participating in RBGG team meeting re key tasks for litigation.	0.4	
11/2/2020	BBK	Reviewing G. Wallace comm'ns w/ opposing counsel re scheduling meet and confer on Ds' request for supplementation of Ps' responses to RFPs and ROGs.	0.1	
11/2/2020	EH	Weekly Brookdale meeting re motion for class cert and discovery efforts.	0.4	
11/5/2020	GCG	Email to GW and team re meet and confer call w/ GM.	0.1	
11/5/2020	BBK	Conferring w/ GCG re revising name plaintiff declarations based on ROG Responses and assisting co-counsel w/ discovery disputes.	0.1	
11/5/2020	BBK	Reviewing Ds' letter memorializing 11/5 meet and confer re Ps' responses to RFPs and ROGs.	0.1	
11/5/2020	JSY	Emails with team re JA injury.	0.1	
11/6/2020	GCG	Conf w/ AX re class member declarations and damages memo.	0.2	
11/6/2020	GCG	Email to JY and team re named plaintiff JA.	0.1	
11/6/2020	JSY	T/c with brother of JA re injury; emails with team re same.	0.2	
11/6/2020	JSY	Draft letter to JA re same.	0.4	
11/6/2020	BBK	Conferring w/ RBGG team re recent meet and confer correspondence on discovery disputes; reviewing AX update re coordination w/ co-counsel on putative class member declarations for class cert.	0.1	
11/6/2020	BBK	Conferring w/ JSY and co-counsel re JA injury.	0.2	
11/9/2020	GCG	Revise letter to named plaintiff; email JSY re same.	0.1	
11/9/2020	BBK	Reviewing draft letter to Algarme.	0.1	
11/9/2020	JSY	Finalize and send letter to JA.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/10/2020	GCG	Factual research re Brookdale financial status.	0.2	
11/10/2020	GCG	Emails to GW, AX and team re meet and confer re plaintiffs' responses.	0.2	
11/10/2020	BBK	Reviewing G. Wallace report re M&C w/ Ds on Ps' discovery responses and agreement to supplement discovery by 12/7.	0.1	
11/10/2020	BBK	Conferring w/ RBGG team and co-counsel re scheduling conference call this week to discuss discovery.	0.2	
11/10/2020	AX	Call w/KES re: class member outreach.	0.3	
11/10/2020	AX	Email correspondence w/ team re: supplementing discovery.	0.1	
11/11/2020	BBK	Conferring w/ team re scheduling co-counsel meeting on supplementation of Ps' discovery responses.	0.1	
11/11/2020	AX	Email correspondence w/ team re: M&C and supplementing discovery.	0.2	
11/11/2020	JSY	Emails re JA injury.	0.1	
11/12/2020	GCG	Conf w/ JSY and emails to GW and team re need to file supplemental discovery responses.	0.2	
11/12/2020	BBK	Conferring w/ team re scheduling co-counsel call re discovery responses.	0.1	
11/12/2020	BBK	Reviewing post-co-counsel meeting emails between G. Wallace and JSY re supplemental discovery responses.	0.1	
11/12/2020	AX	Prepare for team meeting re: supplementing discovery responses.	0.3	
11/12/2020	AX	Team meeting re: supplementing discovery responses.	0.5	
11/12/2020	AX	Call w/ JY re: same.	0.3	
11/12/2020	JSY	T/C re supplementation of ROG and RFP responses; emails re same.	0.6	
11/13/2020	BBK	Conferring w/ RBGG team/co-counsel re scheduling 11/16 meeting to further discuss plan for supplementing Ps' discovery responses.	0.1	
11/13/2020	KES	Gather communications from relative of Brookdale resident and email R. Steyer for follow up re same.	0.9	
11/15/2020	GCG	Review GW and JSY emails re need to supplement plaintiffs' discovery responses.	0.1	
11/16/2020	BBK	Conferring w/ RBGG team re plan for co-counsel call re supplementing Ps' discovery responses.	0.1	
11/16/2020	BBK	Preparing for co-counsel call re supplementing Ps' discovery responses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/16/2020	BBK	Participating in co-counsel call re plan for supplementing Ps' discovery responses.	0.6	
11/16/2020	BBK	Drafting Ps' position/plan on responding to Ds' for Ps' email addresses and social media usernames and redaction protocol for emails/posts that we will produce.	0.3	
11/16/2020	AX	Review emails re: meet and confer efforts.	0.5	
11/16/2020	AX	Team strategy meeting re: supplementing discovery responses.	0.5	
11/16/2020	AX	Draft email to BBK and JY re: prior meeting re: M&C.	0.3	
11/16/2020	JSY	T/C w/ team re supplementation of ROG and RFP responses.	0.6	
11/16/2020	EH	Organized letters re discovery efforts.	0.3	
11/17/2020	BBK	Reviewing communications w/ co-counsel re preparing privilege logs; AX follow-up re plan for discovery supplementation.	0.1	
11/17/2020	BBK	Reviewing AX memo re AC privilege and/or work product protection for communications w/ putative class members prior to certification of class.	0.1	
11/17/2020	AX	Email correspondence w/ team re: pre class certification communication w/ putative class member.	0.2	
11/17/2020	AX	Email correspondence w/ team re supplementing discovery responses.	0.4	
11/17/2020	AX	Review email correspondence from team re: privilege log.	0.2	
11/20/2020	GCG	Emails to BU, MJ and team re ESI letter.	0.1	
11/20/2020	GCG	Meeting w/ BBK, JSY, AX, KES and EH to discuss supplementing plaintiffs' discovery responses and gathering class cert. declarations.	0.6	
11/20/2020	JSY	Team meeting.	0.5	
11/20/2020	JSY	Conf. w/ AX re next steps.	0.2	
11/20/2020	BBK	Reviewing M. Johnson meet and confer letter to Ds' re ESI discovery.	0.1	
11/20/2020	BBK	Participating in RBGG team meeting on case priorities.	0.5	
11/20/2020	AX	Team strategy meeting re: case tasks, discovery responses.	0.5	
11/20/2020	AX	Call with JSY re: case tasks.	0.1	
11/20/2020	AX	Review class member declaration.	0.2	
11/20/2020	AX	Email communication with plaintiffs re discovery.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/20/2020	AX	Draft memo re: damages.	1.0	
11/20/2020	AX	Read draft letter on ESI search terms and custodians and team correspondence re same.	0.4	
11/20/2020	AX	Read GW letter to opposing counsel.	0.3	
11/20/2020	KES	Team meeting re discovery issues.	0.5	
11/20/2020	KES	Email team re putative class member declaration database spreadsheet.	0.1	
11/20/2020	EH	Weekly conference re discovery efforts, rog responses, and motion for class cert.	0.5	
11/23/2020	GCG	Emails to MJ, BBK and team re team meeting to plan motion for class cert.	0.1	
11/23/2020	BBK	Reviewing G. Wallace M&C Letter re supplementing Ps' discovery responses and conferring w/ RBGG team re same.	0.2	
11/23/2020	BBK	Conferring w/ co-counsel and RBGG team re Ps' supplemental discovery.	0.1	
11/23/2020	BBK	Drafting/sending outreach to J. Carlson and P. Lindstrom re supplementing discovery.	0.3	
11/24/2020	BBK	Conferring w/ J. Carlson re supplementing discovery responses.	0.1	
11/24/2020	BBK	Conferring w/ RBGG team re supplementing discovery responses.	0.1	
11/24/2020	BBK	Reviewing AX emails re supplementing discovery responses.	0.1	
11/24/2020	AX	Legal research and email correspondence w/ team re: supplemental responses to discovery.	0.8	
11/24/2020	AX	(Billing Judgment) Email correspondence w/ FGL, JY, BBK and review files for served versions of discovery responses.	0.0	2.2
11/24/2020	AX	Email correspondence re: covid outbreak at San Ramon.	0.5	
11/24/2020	JSY	Emails re supplemental discovery responses.	0.1	
11/24/2020	JSY	Emails re SS covid diagnosis.	0.1	
11/25/2020	BBK	Reviewing AX and M. Johnson updates re S. Stiner.	0.1	
11/25/2020	AX	Call w/ Stacia Stiner.	0.7	
11/25/2020	AX	Update memo.	0.2	
11/25/2020	AX	Email correspondence w/ team re: same.	0.3	
11/25/2020	AX	Draft supplemental discovery responses for Bernie Jestrabek Hart, Loresia Vallette.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/30/2020	BBK	Conferring w/ EH re Ds' privilege log and additional docs ID'd by J Carlson.	0.1	
11/30/2020	AX	Review draft of AW declaration and related documents, and email correspondence w/ team re: same.	1.0	
11/30/2020	AX	Draft supplemental discovery responses.	1.5	
11/30/2020	AX	Review Brookdale privilege log and correspondence w/ team.	0.2	
11/30/2020	AX	Communication with Stacia Stiner.	0.2	
11/30/2020	JSY	Emails with ML re supplementing discovery responses.	0.1	
11/30/2020	EH	Correspondence with relative of putative class member at Brookdale oceanside.	0.4	
11/30/2020	EH	Organizing client documents to file.	0.2	
11/30/2020	EH	Correspondence with co-counsel re client documents.	0.2	
12/1/2020	GCG	Participate in planning meeting for motion for class cert.	1.1	
12/1/2020	GCG	Conf w/ AX re document review and depositions.	0.2	
12/1/2020	GCG	Email to GW and MJ re same.	0.1	
12/1/2020	BBK	(Billing Judgment) reviewing proposed agenda for co-counsel conference call.	0.0	0.1
12/1/2020	BBK	Participating in co-counsel conference call on strategy for class cert.	1.1	
12/1/2020	BBK	Reviewing M. Johnson / G. Maatman comm'ns re ESI production and other discovery disputes.	0.1	
12/1/2020	AX	Team strategy meeting re: case tasks (1.2); call w/ GCG re: same (.3).	1.5	
12/1/2020	JSY	Team meeting.	1.0	
12/2/2020	AX	Draft supplemental interrogatory responses and email correspondence w/ Bernie Jestrabek-Hart.	2.0	
12/3/2020	BBK	Conferring w/ T. Close re staffing expert declaration ISO class cert.	0.1	
12/3/2020	EH	Organize to file legal research re class cert motions.	0.2	
12/4/2020	BBK	Conferring w/ P. Lindstrom re supplemental discovery responses.	0.1	
12/4/2020	BBK	Reviewing staffing expert declarations re use of resident complaints for class cert motion.	0.2	
12/4/2020	BBK	Reviewing Ds' meet and confer letter re ESI.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2020	BBK	Preparing supplemental interrogatory responses for Lindstrom and Carlson.	1.4	
12/4/2020	AX	Phone call w/ Bernie Jestrabek-Hart re: supplemental responses to discovery.	1.0	
12/4/2020	AX	Review client documents and revise supplemental discovery responses.	1.0	
12/4/2020	AX	Email correspondence w/ team re: team meeting.	0.2	
12/7/2020	BBK	Reviewing Ds' response to request for info re KRONOS timekeeping data.	0.1	
12/7/2020	BBK	Conferring w/ JSY and AX re drafting supplemental discovery responses.	0.2	
12/7/2020	BBK	Preparing supplemental discovery responses for Lindstrom and Carlson.	1.4	
12/7/2020	AX	Email correspondence w/ EH re: AW declaration.	0.1	
12/7/2020	AX	Correspondence w/ team re: document review issues.	0.5	
12/7/2020	AX	Draft supplemental discovery responses.	1.0	
12/7/2020	JSY	Emails re updated ROG and RFP responses; emails with ML re documents.	0.3	
12/7/2020	EH	Revised class cert declaration and prepped for call with relative of former resident of Brookdale Oceanside.	0.5	
12/7/2020	EH	Call with relative of former resident at Brookdale Oceanside re class cert declaration.	2.5	
12/8/2020	GCG	Conf w/ AX re documents review meeting.	0.1	
12/8/2020	BBK	Conferring w/ AX re interrogatory responses.	0.1	
12/8/2020	BBK	Viewing M. Johnson meet and confer letter to Ds re ESI production.	0.1	
12/8/2020	BBK	Conferring w/ J. Carlson re supp discovery responses.	0.1	
12/8/2020	BBK	Conferring w/ JSY and AX re co-counsel meeting on 12/9 and supplementing RFP responses.	0.2	
12/8/2020	BBK	Drafting supplemental discovery responses for Carlson & Lindstrom.	1.6	
12/8/2020	BBK	Drafting/sending email to co-counsel and RBGG team re supp disc responses.	0.1	
12/8/2020	AX	Brookdale team meeting re: document review.	1.5	
12/8/2020	AX	Review KES notes re: same.	0.3	
12/8/2020	AX	Correspondence w/ team re: rog and RFP responses.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/8/2020	KES	Zoom meeting with co-counsel re document review and analysis.	1.2	
12/8/2020	KES	(Billing Judgment) Summarize meeting with co-counsel for file.	0.0	0.8
12/8/2020	EH	Revising class cert declaration for relative of former resident at Brookdale Oceanside.	2.4	
12/9/2020	GCG	Team meeting w/ GW and MJ re plaintiffs' supplemental discovery and planning for class cert motion.	0.9	
12/9/2020	BBK	Preparing for call w/ P. Lindstrom re supplemental discovery.	0.1	
12/9/2020	BBK	Conferring by phone w/ P. Lindstrom re supplemental discovery.	0.4	
12/9/2020	BBK	Conferring w AX re supplemental discovery response plan.	0.1	
12/9/2020	BBK	Reviewing AX memo re 12/8 document analysis team meeting and action items.	0.2	
12/9/2020	BBK	Participating in co-counsel meeting on case strategy and tasks.	0.9	
12/9/2020	BBK	Conferring w/ R. Bonner re supp doc production for Lindstrom and Carlson.	0.1	
12/9/2020	BBK	Conferring w/ JSY/AX re supp ROG response on access barriers.	0.1	
12/9/2020	BBK	Revising Lindstrom/Carlson supp ROG responses.	0.4	
12/9/2020	AX	Draft summary of document review meeting to team.	0.5	
12/9/2020	AX	Email correspondence w/ team re: supplemental discovery.	0.5	
12/9/2020	AX	Review service alignment documents.	0.7	
12/9/2020	AX	Correspondence w/ team re: access barrier language for supplemental discovery.	0.2	
12/9/2020	AX	Review Brookdale privilege log and draft summary email to team.	1.0	
12/9/2020	AX	Phone call w/ Loresia Vallette and emails re: supplemental discovery.	0.7	
12/9/2020	AX	Team meeting re: discovery.	1.0	
12/9/2020	JSY	T/C with ML re updated ROG responses.	0.4	
12/9/2020	JSY	Draft updated ROG responses for Boris.	0.8	
12/9/2020	JSY	Team meeting.	1.0	
12/9/2020	JSY	Review new ML documents; emails re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/9/2020	KES	Download and organize service alignment docs gathered by co-counsel for AX analysis.	0.3	
12/9/2020	EH	Organizing and saving client docs to file.	0.4	
12/10/2020	BBK	Conferring w/ co-counsel re supplemental document production.	0.1	
12/10/2020	BBK	Conferring w/ co-counsel re supplemental discovery responses.	0.1	
12/10/2020	BBK	Conferring w/ P. Lindstrom re FU call on supp discovery responses.	0.1	
12/10/2020	BBK	Preparing for call w/ J. Carlson re supp discovery responses.	0.2	
12/10/2020	BBK	Conferring by phone w/ J. Carlson re supp discovery responses.	1.1	
12/10/2020	BBK	Revising Carlson supp ROG responses.	0.2	
12/11/2020	GCG	Email to expert re report.	0.1	
12/11/2020	BBK	Reviewing/commenting on T. Close draft privilege log.	0.7	
12/11/2020	BBK	Conferring w/ RBGG team re meeting on case strategy.	0.1	
12/11/2020	BBK	Revising Carlson supplemental interrogatory responses.	0.4	
12/11/2020	JSY	Review privilege log; emails re same.	0.1	
12/11/2020	KES	Review emails and other correspondence with co-counsel re draft privilege logs and organize electronic files with same.	0.7	
12/13/2020	GCG	Review GW draft discovery responses.	0.2	
12/13/2020	GCG	Emails to AX and team re same.	0.2	
12/13/2020	AX	Email correspondence w/ team re: privilege log, discovery.	0.3	
12/14/2020	BBK	Conferring w/ co-counsel and RBGG team re privilege log.	0.1	
12/14/2020	BBK	Conferring w/ RBGG team re supplemental interrogatory responses.	0.2	
12/14/2020	BBK	Preparing for call w/ P Lindstrom re supp disc responses.	0.2	
12/14/2020	BBK	Conferring by phone w/ P Lindstrom re supp disc responses.	0.9	
12/14/2020	BBK	Conferring w/ co-counsel re revisions to supp interrogatory responses re damages.	0.3	
12/14/2020	BBK	Conferring by email w/ P Lindstrom re supp disc resps.	0.1	
12/14/2020	BBK	Conferring w/ J. Carlson re supp disc responses and scheduling call.	0.2	
12/14/2020	BBK	Revising Carlson supp rog and RFP responses.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/14/2020	BBK	Revising Lindstrom supp rog and RFP responses.	0.7	
12/14/2020	BBK	Conferring w/ co-counsel re comments on Carlson supp Rog responses.	0.1	
12/14/2020	AX	Review comments and draft interrogatory responses.	2.8	
12/14/2020	JSY	Review client documents for production; emails re same.	0.2	
12/14/2020	JSY	Emails with client JA re status.	0.1	
12/14/2020	JSY	Draft supplemental ROG responses.	1.5	
12/14/2020	KES	TC R. Steyer re class member outreach and information from complaints database analysis; review and email database information re same.	1.0	
12/14/2020	EH	Revising class cert declaration from relative of former resident at Brookdale Oceanside.	0.6	
12/15/2020	GCG	Review and revise draft privilege log and case memos.	0.2	
12/15/2020	GCG	Confs w/ and emails to MJ and KES and email to team re same.	0.6	
12/15/2020	BBK	Revising Lindstrom supp rog responses.	0.3	
12/15/2020	BBK	Conferring w/ co-counsel re supp rog responses.	0.2	
12/15/2020	BBK	Reviewing comm'ns w/ co-counsel re finalizing privilege log.	0.1	
12/15/2020	AX	Review team email correspondence re: privilege log.	0.2	
12/15/2020	AX	(Billing Judgment) Review news article re: Brookdale sale.	0.0	0.2
12/15/2020	JSY	Conf. w/ ML re ROG responses.	0.3	
12/15/2020	KES	TC M. Johnson re client document and discovery response issue; review source of documents re same.	0.7	
12/15/2020	KES	Confer GCG re document production.	0.2	
12/15/2020	EH	Organizing and saving privileges logs produced by Plaintiffs' to file.	0.1	
12/15/2020	EH	(Billing Judgment) Saving to file article re Brookdale.	0.0	0.3
12/16/2020	JSY	Meeting re ROG re responses.	1.0	
12/16/2020	JSY	Edit supplemental ROG responses; emails re same.	1.3	
12/16/2020	JSY	Research re Fountaingrove inspection.	0.5	
12/16/2020	JSY	Emails re ROG responses.	0.1	
12/16/2020	BBK	Conferring w/ co-counsel by email re supp interrogatory responses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/16/2020	BBK	Revising Lindstrom supp rog responses.	0.6	
12/16/2020	BBK	Participating in co-counsel conference call re supplementing discovery.	1.0	
12/16/2020	BBK	Drafting additions to Carlson supp rog responses per co-counsel conference call.	1.9	
12/16/2020	BBK	Drafting additions to Lindstrom supp rog responses per co-counsel conference call.	1.7	
12/16/2020	BBK	Preparing verifications for Lindstrom/Carlson supp rog responses; conferring w/ JSY/AX re same.	0.2	
12/16/2020	BBK	Conferring w/ JSY and AX re revisions to supp rog responses.	0.2	
12/16/2020	BBK	Conferring w/ G Wallace re comments on draft supp rog responses.	0.1	
12/16/2020	AX	Team meeting re: coordinating discovery responses.	1.0	
12/16/2020	AX	Email correspondence and document review re: Brookdale Hemet report.	0.8	
12/16/2020	AX	Email correspondence re: verification.	0.2	
12/16/2020	AX	Email correspondence re: standard language for barriers.	0.5	
12/16/2020	AX	Email correspondence re: Ralph Schmidt interrogatory responses.	0.2	
12/16/2020	AX	Email correspondence re discovery responses.	0.2	
12/16/2020	AX	Revise Bernie Jestrabek Hart's discovery responses.	1.3	
12/16/2020	AX	Read email correspondence re: ESI.	0.1	
12/16/2020	KES	Participate in telephone conference with co-counsel re discovery responses.	0.8	
12/17/2020	GCG	Emails to GW and team re plaintiffs' responses to discovery.	0.1	
12/17/2020	GCG	Conf w/ JSY re same.	0.1	
12/17/2020	GCG	Email to JM and MJ re ESI dispute.	0.1	
12/17/2020	BBK	Revising Carlson and Lindstrom supp rog responses.	0.7	
12/17/2020	BBK	Conferring by email w/ J. Carlson and P. Lindstrom re supp rog responses.	0.4	
12/17/2020	BBK	Conferring w/ WP/KES/EH and co-counsel re finalizing/serving supp disc responses on 12/18.	0.2	
12/17/2020	BBK	Analyzing Carlson and Lindstrom docs to prepare supp doc production; conferring w/ R.Bonner re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/17/2020	BBK	Attending to obtaining signed verification from P. Lindstrom for supp rog resps.	0.3	
12/17/2020	BBK	Reviewing M. Johnson-G. Maatman meet and confer emails re Ds' delays in ESI production.	0.1	
12/17/2020	BBK	Finalizing Lindstrom supp rog and RFP responses.	0.2	
12/17/2020	BBK	Conferring by phone w/ J. Carlson re supp discovery responses.	1.2	
12/17/2020	BBK	Finalizing Carlson supp rog and RFP responses.	0.3	
12/17/2020	BBK	Attending to obtaining verification from J. Carlson for supp rog response.	0.2	
12/17/2020	BBK	Conferring w/ co-counsel re supp RFP responses.	0.2	
12/17/2020	AX	Call w/ Bernie Jestrabek Hart re: discovery responses.	0.1	
12/17/2020	AX	Call w/ KES re: coordinating responses from cocounsel.	0.2	
12/17/2020	AX	Read email correspondence w/ cocounsel and opposing counsel re: ESI.	0.2	
12/17/2020	AX	Email correspondence re: discovery responses.	0.1	
12/17/2020	AX	Draft supplemental responses for Loresia Vallette and Lawrence Quinlan.	1.0	
12/17/2020	AX	Email correspondence re: successor in interest declaration.	0.4	
12/17/2020	AX	Revise responses for Loresia Vallette.	0.2	
12/17/2020	AX	Correspondence w/ plaintiffs re: discovery responses.	0.5	
12/17/2020	JSY	Conf. w/ GCG re discovery issues.	0.1	
12/17/2020	JSY	Finalize supplemental ROG responses.	1.2	
12/17/2020	KES	Emails with team re discovery responses and begin review and finalization of draft responses.	0.6	
12/18/2020	GCG	Confs w/ AX and KES re amended discovery responses.	0.3	
12/18/2020	GCG	Emails to BBK, GW and team re same and re plaintiffs' ESI.	0.2	
12/18/2020	BBK	Conferring w/ co-counsel and RBGG team re response to Ds' demand for ESI search terms and custodians from Plaintiffs.	0.3	
12/18/2020	BBK	Reviewing meet and confer email by M. Johnson re ESI.	0.1	
12/18/2020	BBK	Revising supplemental RFP responses for Lindstrom and Carlson.	0.2	
12/18/2020	BBK	Conferring w/ co-counsel re serving discovery responses.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/18/2020	BBK	Conferring by phone w/ AX re finalizing/serving supplemental discovery responses.	0.2	
12/18/2020	AX	Call w/ KES re: finalizing discovery responses.	0.3	
12/18/2020	AX	Call w/ GCG re: supplemental responses.	0.1	
12/18/2020	AX	Call w/ JSY re: same.	0.2	
12/18/2020	AX	Call w/ BBK re: finalizing discovery responses.	0.2	
12/18/2020	AX	Call w/ Loresia Vallette re: finalizing interrogatory responses.	0.5	
12/18/2020	AX	Phone call w/ BU re: successor in interest and related emails.	0.3	
12/18/2020	AX	Draft updated RFP responses for Bernie Jestrabek Hart and Loresia Vallette.	0.6	
12/18/2020	AX	Finalize and review all documents before serving to Brookdale.	0.5	
12/18/2020	AX	Review staffing alignment documents.	1.5	
12/18/2020	AX	Review declarations re; CCP § 377.32.	0.3	
12/18/2020	AX	Team correspondence re; finalizing discovery responses.	0.5	
12/18/2020	AX	Email correspondence w/ BJHI and revise interrogatory accordingly.	0.3	
12/18/2020	JSY	Emails re discovery responses; conf. w/ AX re same.	0.3	
12/18/2020	AX	Draft supplemental response to interrogatory #25 for Loresia Vallette and email team.	0.8	
12/18/2020	KES	Finalize and serve plaintiffs' supplemental discovery responses.	3.5	
12/21/2020	BBK	Reviewing Ps' portion of draft joint discovery letter on ESI dispute.	0.1	
12/21/2020	BBK	Conferring w/ EH re follow-up w/ intake from family member of BD Folsom resident.	0.1	
12/21/2020	BBK	Reviewing AX update re supp discovery responses.	0.1	
12/21/2020	AX	Revise draft of Vallette supplemental responses to interrogatories and circulate to team (1.0).	1.0	
12/22/2020	BBK	Conferring w/ EH re follow-up w/ family of BD Folsom former resident.	0.1	
12/22/2020	BBK	Reviewing Ds' portion of draft joint discovery letter brief on ESI dispute.	0.1	
12/22/2020	AX	Review documents re: ESI custodians.	1.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/22/2020	EH	Correspondence with relative of putative class member at Brookdale Folsom.	0.2	
12/22/2020	EH	Emails with co-counsel re class certification declarations and outreach.	0.2	
12/23/2020	GCG	Email team re putative class member interview.	0.1	
12/23/2020	GCG	Email EH-team re supplemental discovery responses.	0.1	
12/23/2020	BBK	Reviewing M. Johnson revisions to Ps' portion of joint discovery ltr brief re ESI.	0.1	
12/23/2020	EH	Organizing to file supplemental discovery responses for named plaintiffs'.	0.3	
12/24/2020	GCG	Email MJ-JM re letter brief ISO motion to compel.	0.1	
12/24/2020	AX	Read email correspondence re: meet and confer letter.	0.1	
12/28/2020	GCG	Emails GW-MJ re motions for class certification and to compel.	0.1	
12/28/2020	GCG	Conference with KES re document review.	0.1	
12/28/2020	BBK	Reviewing Ds' meet and confer ltr seeking production of expert photos during inspections.	0.1	
12/31/2020	BBK	Reviewing M. Johnson M&C ltr IRT Ds' demand for production of expert photographs.	0.1	
12/31/2020	BBK	Reviewing M. Johnson-G. Maatman comm'ns re finalizing/filing joint discovery ltr brief re ESI.	0.1	
1/3/2021	GCG	Fact research re staffing; email to EH and team re same.	0.1	
1/4/2021	GCG	Email to KES re factual research; email to GW re call.	0.1	
1/4/2021	BBK	Reviewing discovery order on ESI production.	0.1	
1/4/2021	AX	Email correspondence re: document review projects and meetings.	0.2	
1/4/2021	KES	Download and circulate pleadings.	0.1	
1/4/2021	KES	(Billing Judgment) Circulate news article re Covid in nursing homes and research contact information re same.	0.0	0.2
1/5/2021	GCG	Email to MJ and GM re discovery follow up; email to MJ and team re ESI.	0.1	
1/5/2021	BBK	Conferring by phone w/ GCG re case strategy and tasks.	0.1	
1/5/2021	BBK	Reviewing M. Johnson-opposing counsel meet and confer emails re supp doc productions.	0.1	
1/6/2021	GCG	Review Judge Beeler order.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/6/2021	GCG	Review communications w/ defendant's counsel re ESI issues.	0.2	
1/7/2021	GCG	Review emails to JM and MJ re defendant's failure to produce ESI a discovery.	0.2	
1/7/2021	GCG	Conf w/ MJ and GW re motion for class cert pleadings and plan.	1.0	
1/7/2021	GCG	Email to RBGG team re same.	0.1	
1/7/2021	JSY	Emails re forensic cell phone expert.	0.2	
1/7/2021	JSY	T/c with GG re same and re deposition schedule.	0.2	
1/7/2021	BBK	Conferring w/ RBGG team re case tasks.	0.1	
1/7/2021	AX	Review documents re: staffing alignment issues.	2.1	
1/7/2021	KES	Brief review of team to do list and emails re same.	0.2	
1/7/2021	KES	Review emails and documents re ongoing discovery issues.	0.3	
1/8/2021	GCG	Email to GW re co-counsel agreement.	0.1	
1/8/2021	GCG	Conf w/ JSY, AX and KES re document review and deposition planning.	0.3	
1/8/2021	BBK	Reviewing M. Johnson - G. Maatman meet and confer emails re outstanding discovery.	0.1	
1/8/2021	AX	Prepare for and attend team strategy meeting re: review of Brookdale discovery documents.	1.5	
1/8/2021	AX	Review staffing and staffing alignment related documents.	2.0	
1/8/2021	AX	Team strategy meeting re: case tasks.	0.5	
1/8/2021	AX	Review team correspondence re: discovery issues.	0.1	
1/8/2021	AX	Correspondence w/ team re: Jeanette Algarme.	0.1	
1/8/2021	JSY	Messages with JA; emails with team re same.	0.2	
1/8/2021	JSY	Team meeting.	0.3	
1/8/2021	KES	Zoom meeting with co-counsel re document review and analysis.	1.2	
1/8/2021	KES	Internal team meeting re discovery issues.	0.5	
1/8/2021	KES	Review and code residency agreements produced by defendants in connection with agreements to arbitrate.	2.7	
1/11/2021	BBK	Conferring w/ co-counsel and AX/JSY re responding to Ds' demand for additional ESI from name Ps.	0.2	
1/11/2021	AX	Email correspondence w/ team re: pls' ESI.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 346

SERVICES

Date	Person	Description of Services	Hours	Discount
1/11/2021	AX	Review documents from pls.	0.2	
1/11/2021	AX	Review Brookdale emails re: service alignment issues.	1.5	
1/11/2021	JSY	Emails re discovery responses and document production from clients.	0.2	
1/11/2021	KES	Continue review and coding of agreements to arbitrate / opt out in RA's produced by Defs.	2.5	
1/11/2021	EH	Organizing to file correspondence from defendants re custodial search terms.	0.1	
1/12/2021	JSY	T/C with JA; emails with team re same.	0.5	
1/12/2021	BBK	Reviewing JSY update to team re call w/ name plaintiff J. Algarme.	0.1	
1/12/2021	AX	Review service alignment documents.	3.0	
1/12/2021	AX	Draft memo re: inputs, Brookdale tools.	2.4	
1/12/2021	AX	Team correspondence re: class representatives.	0.1	
1/12/2021	KES	Continue review and coding of agreements to arbitrate in residence agreements.	2.0	
1/12/2021	KES	Review AX memo re analysis of Service Alignment documents.	0.1	
1/13/2021	GCG	Review client documents to determine if producible.	0.2	
1/13/2021	GCG	Conf w/ and email to KES re same.	0.1	
1/13/2021	GCG	Draft email to GW and MJ re same.	0.1	
1/13/2021	GCG	Conf w/ BBK re declaration ISO class cert.	0.2	
1/13/2021	GCG	Email to BBK re fire station subpoenas.	0.1	
1/13/2021	GCG	Review JSY report on JA status.	0.1	
1/13/2021	GCG	Email to TC, GW and MJ re class cert motion.	0.1	
1/13/2021	BBK	Reviewing JSY - M. Johnson comm'ns re additional updates from name P J. Algarme.	0.1	
1/13/2021	BBK	Reviewing AX memo analyzing BD's service alignment documents.	0.2	
1/13/2021	BBK	Conferring by phone w/ GCG re case priorities.	0.2	
1/13/2021	BBK	Reviewing M. Johnson email to Ds memorializing 1/13 meet and confer on outstanding disc disputes.	0.1	
1/13/2021	JSY	Messages with JA re status; emails with team re same.	0.3	
1/13/2021	KES	Continue review and coding of arbitration agreement opt outs.	2.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 347

SERVICES

Date	Person	Description of Services	Hours	Discount
1/13/2021	KES	Update doc review memo re particular document and review notes re same; email co-counsel re same.	0.9	
1/13/2021	KES	Confer GCG re documents from other than named plaintiffs in connection with doc production; review documents re same.	0.5	
1/14/2021	BBK	Responding to GCG query re analysis of SDT responses from fire and police dep'ts.	0.3	
1/14/2021	BBK	Reviewing M. Johnson M&C email re outstanding doc prods from Ds.	0.1	
1/14/2021	BBK	Conferring w/ T Close re drafting declaration analyzing CCL and internal complaints.	0.2	
1/14/2021	JSY	T/C with attorney for JA; emails with team re same.	0.4	
1/14/2021	AX	Team correspondence re: named plaintiffs.	0.2	
1/14/2021	AX	Review exemplar class certification motions.	0.5	
1/14/2021	AX	Review EH draft of class member declaration.	0.5	
1/14/2021	AX	Review correspondence w/ team and opposing counsel re: timekeeping data.	0.1	
1/14/2021	KES	Continue review and coding of RA agreements to arbitrate.	2.0	
1/14/2021	KES	Update electronic files.	0.1	
1/14/2021	EH	Conference with relative of putative class member at Brookdale Folsom.	0.5	
1/14/2021	EH	Drafted memo from call with relative of putative class member at Brookdale Folsom (.3); summarized same and circulated to team (.2).	0.5	
1/15/2021	GCG	Emails to JSY and team re team meeting.	0.1	
1/15/2021	GCG	Conf w/ EH re C.M. declarations.	0.1	
1/15/2021	BBK	Participating in RBGG team meeting re case strategy.	0.6	
1/15/2021	BBK	Reviewing M. Johnson request for suppl ROG responses re construction and alteration of facilities.	0.1	
1/15/2021	BBK	Conferring w/ co-counsel re identifying additional Plaintiffs.	0.2	
1/15/2021	JSY	Team meeting; emails re named plaintiff search.	0.7	
1/15/2021	AX	Brookdale strategy conference w/ team re: review of discovery documents.	1.4	
1/15/2021	AX	Meeting with JSY, BBK, EH re: case tasks.	0.5	
1/15/2021	KES	Zoom meeting with co-counsel re document review and analysis and additional production.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/15/2021	EH	Conference with BBK, JSY and AX re outstanding discovery issues, drafting declarations for putative class members and preparing PMK depositions.	0.6	
1/18/2021	GCG	Conf w/ AX re document review and list of potential deponents.	0.1	
1/18/2021	GCG	Research and draft memo to co-counsel re miscellaneous documents not yet produced.	0.2	
1/18/2021	GCG	Review memo to file re public records and investigation.	0.2	
1/18/2021	GCG	Email to RS and JSY re potential additional plaintiffs to add.	0.1	
1/19/2021	GCG	Research and revise memo re documents to produce or withhold.	0.5	
1/19/2021	GCG	Conf w/ KES and emails to MJ re same.	0.2	
1/19/2021	GCG	Conf w/ JSY re named plaintiff.	0.1	
1/19/2021	GCG	Email to MH re status.	0.1	
1/19/2021	BBK	Conferring w/ GCG re PRA responses from Sonoma County fire depts and sheriff.	0.1	
1/19/2021	BBK	Conferring w/ JSY and co-counsel re potential new plaintiffs.	0.1	
1/19/2021	BBK	Reviewing GCG report to co-counsel re Ps' supp doc production.	0.1	
1/19/2021	JSY	Messages with JA re move; emails with team re same.	0.1	
1/19/2021	JSY	Emails re new named plaintiffs.	0.2	
1/19/2021	AX	Revise A. W. declaration and email correspondence w/ EH re same.	1.6	
1/19/2021	KES	Review GCG draft email to co-counsel re document production issues.	0.2	
1/19/2021	KES	Review notes, memos and documents re same.	0.9	
1/19/2021	KES	Tc GCG re same.	0.2	
1/20/2021	GCG	Email to MJ and team re plaintiffs' documents/production.	0.1	
1/20/2021	BBK	Reviewing meet and confer email from M. Johnson to Ds re delay in doc production.	0.1	
1/20/2021	AX	Email correspondence w/ EH re: class certification declarations.	0.1	
1/20/2021	AX	Correspondence w/ team re: production of resident files and motion to amend.	0.2	
1/20/2021	AX	Review documents re: EDs at pl facilities and ESI.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/21/2021	AX	Review Brookdale discovery including org charts, ESI, and related documents and draft memo re: depositions.	3.9	
1/21/2021	AX	Email correspondence re: AW declaration.	0.2	
1/21/2021	EH	Revised declaration of putative class member who resided at Brookdale Oceanside and San Marcos facilities.	0.5	
1/22/2021	GCG	Team meeting re class cert declarations and tasks.	0.5	
1/22/2021	GCG	Emails to GW and JSY re potential named plaintiffs outreach.	0.1	
1/22/2021	BBK	Reviewing AX notes re meeting on doc analysis and depo prep.	0.1	
1/22/2021	BBK	Meeting w/ RBGG team re case tasks.	0.4	
1/22/2021	BBK	Conferring w/ co-counsel re identifying new Plaintiffs.	0.1	
1/22/2021	JSY	Team meeting; emails re named plaintiff recruitment.	0.6	
1/22/2021	AX	Document review meeting with cocounsel re: discovery related document review tasks.	0.5	
1/22/2021	AX	Email correspondence w/ team re: ED depositions.	0.2	
1/22/2021	AX	Meeting with RBGG team re: team tasks.	0.5	
1/22/2021	AX	Review documents re: memo about ED history and depositions.	1.5	
1/22/2021	KES	RBGG Zoom meeting re case tasks.	0.4	
1/22/2021	KES	Participate in Zoom call with co-counsel re document review status and new tasks.	0.8	
1/22/2021	EH	Conference with team re class cert declarations and depositions of Executive Directors/PMKs.	0.4	
1/22/2021	EH	Research for class cert declarations and organizing same to file.	0.4	
1/25/2021	BBK	Reviewing M&C comm'ns w/ opposing counsel re production of pendant call data.	0.1	
1/25/2021	AX	Review discovery documents re: Brookdale facility Executive Directors, cast of characters, and communication with team re same.	3.0	
1/25/2021	KES	Begin analysis of job descriptions across facilities using personnel reports.	3.0	
1/26/2021	KES	Continue review and analysis of facility personnel reports in preparation for class cert.	5.0	
1/27/2021	GCG	Review MJ memo re proposed deposition list.	0.1	
1/27/2021	GCG	Emails to JSY, MJ and AX re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/27/2021	GCG	Review MJ and JM emails re discovery dispute over pendant data.	0.1	
1/27/2021	GCG	Conf w/ JSY and emails to GW and team re CC motion.	0.2	
1/27/2021	BBK	Reviewing JSY update re call w/ name plaintiff J. Algarme.	0.1	
1/27/2021	JSY	T/C with JA re status; emails with team re same.	0.5	
1/27/2021	JSY	Conf. w/ AX re EDs for deposition.	0.1	
1/27/2021	AX	Review documents and draft memo re: Executive Directors to depose.	3.4	
1/27/2021	AX	Correspondence w/ team re same.	0.2	
1/27/2021	KES	Continue staffing model, job title document analysis.	1.8	
1/28/2021	GCG	Email to GW re class cert motion.	0.1	
1/28/2021	GCG	Emails to AX and MJ re ED depositions.	0.1	
1/28/2021	BBK	Reviewing comm'ns w/ co-counsel and AX re potential deponents.	0.1	
1/28/2021	JSY	Emails re ED depos.	0.1	
1/28/2021	AX	Review documents re: depositions for Executive Directors and draft memo re same.	1.0	
1/28/2021	AX	Review documents re: depositions for executive and regional level management and draft memo re: same.	2.5	
1/28/2021	AX	Correspondence w/ team re: current Brookdale EDs.	0.2	
1/28/2021	KES	Continue review and analysis of facility staffing model including job titles and descriptions.	5.0	
1/29/2021	GCG	Team meeting re class rep declarations and preparation for upcoming depositions.	0.5	
1/29/2021	GCG	Review and respond to AX and MJ communications re ED depositions.	0.1	
1/29/2021	BBK	Conferring w/ co-counsel and RBGG team re deposition plan.	0.2	
1/29/2021	BBK	Participating in RBGG team meeting re case tasks and strategy.	0.4	
1/29/2021	BBK	Reviewing M. Johnson email to Ds memorializing M&C on pendant call data.	0.1	
1/29/2021	JSY	Team meeting.	0.5	
1/29/2021	AX	Strategy meeting with team re: document review issues.	0.6	
1/29/2021	AX	Correspondence w/ team re: case issues, including deposition prep and meet and confer calls.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/29/2021	AX	Prepare for and attend meet and confer call re: pendant usage data.	0.1	
1/29/2021	AX	Call w/ MJ re: motions to compel, discovery, and various documents.	0.5	
1/29/2021	AX	Review documents re: Executive Directors.	0.5	
1/29/2021	KES	Continue review and analysis of facility staffing model, job descriptions.	2.2	
1/29/2021	KES	Zoom conference with co-counsel re document review.	0.8	
1/29/2021	KES	Zoom conference RBGG team re class cert tasks.	0.5	
1/29/2021	EH	Weekly conference with team re depositions of Executive Directors, class cert motion, document review.	0.4	
1/29/2021	EH	Correspondence with relatives of Brookdale putative class members at Brookdale Oceanside and Folsom facilities re motion for class cert.	0.3	
2/1/2021	BBK	Reviewing AX report re 1/29 document analysis co-counsel meeting.	0.1	
2/1/2021	BBK	Reviewing memos/reports from AX and co-counsel re identifying deponents and depo prep.	0.2	
2/1/2021	BBK	Meeting w/ co-counsel re deposition strategy.	0.5	
2/1/2021	BBK	Conferring w/ JSY/AX re deposition strategy and plan.	0.3	
2/1/2021	BBK	Reviewing G. Wallace draft depo topics memo.	0.2	
2/1/2021	JSY	Team meeting re ED depositions; emails re same.	0.8	
2/1/2021	AX	Meeting with team re: Brookdale ED depositions.	0.5	
2/1/2021	AX	Circulate summary email to team and related correspondence.	0.5	
2/1/2021	AX	Emails to cocounsel re: sharing documents.	0.2	
2/1/2021	AX	Email correspondence re: pendant response data meet and confer.	0.4	
2/1/2021	AX	Email correspondence re: remote deposition.	0.2	
2/1/2021	AX	Review emails and documents for MH deposition.	1.3	
2/2/2021	GCG	Emails to BBK and team re ED depositions.	0.1	
2/2/2021	BBK	Conferring w/ team re noticing depositions.	0.1	
2/2/2021	AX	Review draft interrogatories.	0.4	
2/2/2021	AX	Correspondence w/ team re: deposition schedule.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/2/2021	KES	Gather additional personnel reports from Relativity and continue analysis in preparation for upcoming depositions.	2.2	
2/3/2021	BBK	Reviewing/commenting on draft Interrogatories.	0.2	
2/3/2021	BBK	Reviewing M. Johnson comm'ns w/ opposing counsel re scheduling Exec Dir depositions.	0.1	
2/3/2021	KES	Continue gathering personnel reports and analyze in relation to job titles and descriptions.	3.2	
2/4/2021	GCG	Emails to AX and MJ re upcoming depositions and document review.	0.1	
2/4/2021	JSY	Draft and edit JA declaration.	2.0	
2/4/2021	JSY	Emails re same and re DSS complaints.	0.3	
2/4/2021	BBK	Conferring w/ co-counsel re revisions to 3d Set of ROGs.	0.2	
2/4/2021	BBK	Planning analysis of DSS reports/citations for BBK Decl ISO Class Cert; conferring w/ T. Close and EH re same.	0.5	
2/4/2021	BBK	Reviewing M. Johnson comm'ns w/ opposing counsel re outstanding discovery; Ds' request for depo dates for name plaintiffs.	0.1	
2/4/2021	AX	Legal research and draft Vallette declaration re CCP 377.32.	1.5	
2/4/2021	AX	Email communication w/ BJH re: declarations, depositions.	0.2	
2/4/2021	AX	Email communications w/ team re: interrogatories, depositions, and DSS reports re: Brookhurst.	0.2	
2/4/2021	AX	Update BJH declaration.	1.5	
2/4/2021	KES	Review DSS complaints for Plaintiff facility re incident.	0.2	
2/4/2021	EH	Emails with co-counsel re analyzing Brookdale DSS complaints.	0.5	
2/5/2021	GCG	Team meeting to discuss class member declarations and depositions and ED deposition preparation.	0.4	
2/5/2021	BBK	Conferring w/ JSY/AX re successor-in-interest decl for Vallette; reviewing JSY-G. Wallace comm'ns re revised Algarme class cert decl.	0.1	
2/5/2021	BBK	Conferring w/ EH re analysis of DSS complaints for class cert decl.	0.2	
2/5/2021	BBK	Conferring w/ EH re class rep declarations.	0.1	
2/5/2021	BBK	Conferring w/ co-counsel re finalizing/serving 3d Set of Rogs.	0.1	
2/5/2021	BBK	Meeting w/ RBGG team re case strategy and upcoming tasks.	0.4	
2/5/2021	JSY	Emails re successor in interest declaration.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/5/2021	JSY	Emails re JA declaration and supplemental ROG responses; edit same.	1.1	
2/5/2021	JSY	Team meeting re case tasks.	0.5	
2/5/2021	AX	Call w/ Bernie Jestrabek-Hart re: depositions.	0.9	
2/5/2021	AX	Strategy meeting with team re: document production issues.	0.5	
2/5/2021	AX	Strategy meeting with RBGG team re: case tasks.	0.5	
2/5/2021	AX	Draft Loresia Vallette declaration re: class certification.	1.5	
2/5/2021	KES	Participate in weekly Zoom doc review meeting with co-counsel.	0.5	
2/5/2021	KES	Email to team re missing personnel reports for named plaintiff facilities in connection with job title analysis.	0.2	
2/5/2021	EH	Weekly team conference re motion for class cert preparation.	0.4	
2/8/2021	GCG	Review BBK report on meeting w/ GW and team re deposition.	0.1	
2/8/2021	GCG	Initial review of TC memo on facility ownership.	0.2	
2/8/2021	BBK	Prep for co-counsel meeting on depositions.	0.1	
2/8/2021	BBK	Meeting w/ co-counsel on depositions.	1.0	
2/8/2021	BBK	Drafting/sending update to GCG re deposition plan.	0.3	
2/8/2021	JSY	Meeting re ED and PMK depositions.	0.9	
2/8/2021	JSY	Draft Supp ROG responses for Algarme.	1.0	
2/8/2021	AX	Team strategy meeting re: PMK and ED depositions.	1.0	
2/8/2021	AX	Correspondence w/ team re: same.	0.2	
2/8/2021	AX	Review draft PMK deposition notice.	0.5	
2/9/2021	GCG	Review and analyze TC memo re ownership and leasing of Brookdale facilities.	0.6	
2/9/2021	GCG	Begin work on Grunfeld declaration ISO class cert.	0.2	
2/9/2021	GCG	Review MJ draft email re plaintiffs' depositions.	0.2	
2/9/2021	GCG	Email GW re DM and expert depositions.	0.1	
2/9/2021	BBK	Reviewing M. Johnson-G. Maatman emails re pendant call data production.	0.1	
2/9/2021	BBK	Reviewing/commenting on M. Johnson's draft response to Ds re plaintiff depositions.	0.1	
2/9/2021	BBK	Drafting Lindstrom class cert decl.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/9/2021	AX	Review documents re: prep for ED depositions and PMK depositions.	2.5	
2/9/2021	AX	Related correspondence to team re same.	0.6	
2/10/2021	GCG	Conf w/ AX re preparation for ED depositions and document review.	0.2	
2/10/2021	BBK	Reviewing/commenting on joint discovery letter brief draft on Ds' demand for expert photographs.	0.2	
2/10/2021	AX	Review and revise PMK deposition notice and correspondence w/ team re: same.	1.7	
2/10/2021	AX	Review memo re: Brookdale facility licensing.	0.4	
2/10/2021	AX	Review sample class cert motions and PMK deposition transcripts.	0.8	
2/10/2021	KES	Download sample ED depo transcripts and update electronic files.	0.2	
2/10/2021	EH	Analyzed DSS complaints for Brookdale facilities.	1.9	
2/11/2021	BBK	Reviewing report re outbreak of COVID at BD Napa; reviewing M. Johnson FU w/ Ds re deposition dates for Executive Directors.	0.1	
2/11/2021	BBK	Conferring w/ EH re status of DSS complaint analysis.	0.1	
2/11/2021	AX	Review Brookdale productions, deposition transcripts and prepare deposition outline for MH deposition.	3.5	
2/11/2021	AX	Communication with Loresia Vallette attorney re: successor in interest and Quinlan trust.	0.2	
2/11/2021	AX	Review pendant documents and team correspondence.	0.3	
2/11/2021	KES	Continue review and analysis of personnel reports, especially relating to Plaintiff facilities and confirm existing reports captured in search.	3.0	
2/11/2021	EH	Analyzed DSS complaints for Brookdale facilities.	2.0	
2/12/2021	GCG	Meet w/ BBK, AX and EH re preparation for upcoming depositions.	0.6	
2/12/2021	GCG	Conf w/ and email to GW re same and overall case strategy.	0.6	
2/12/2021	BBK	Reviewing/commenting on AX's proposed revisions to draft Rule 30(b)(6) deposition notice.	0.2	
2/12/2021	BBK	Reviewing EH initial analysis of DSS complaints and commenting thereon.	0.5	
2/12/2021	BBK	Meeting w/ RBGG team re case strategy and next steps.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 355

SERVICES

Date	Person	Description of Services	Hours	Discount
2/12/2021	BBK	Reviewing M. Johnson/G. Maatman comm'ns re ED depositions and joint discovery ltr on expert photographs.	0.1	
2/12/2021	AX	Brookdale RBGG team meeting re: case tasks.	0.8	
2/12/2021	AX	Brookdale team meeting re: document production issues.	0.5	
2/12/2021	AX	Phone calls with LV and trust attorney re: successor in interest issues.	0.3	
2/12/2021	AX	Review trust agreement.	0.5	
2/12/2021	AX	Revise declaration and related communications with LV re same.	0.5	
2/12/2021	AX	Review 30b6 deposition notice and communication with team re: same.	0.5	
2/12/2021	AX	Email correspondence w/ team re: ED history.	0.3	
2/12/2021	KES	Summarize existing and missing personnel reports for Plaintiff facilities for class period; update and circulate related Relativity search re same.	2.0	
2/12/2021	KES	Document review Zoom meeting with co-counsel.	0.9	
2/12/2021	EH	Summarized for BBK questions re review of DSS complaints for Brookdale facilities.	0.5	
2/12/2021	EH	Weekly conference with team re preparation for depositions.	0.5	
2/16/2021	GCG	Email to GW and MJ re response to defendant's deposition position.	0.1	
2/16/2021	BBK	Reviewing AX notes from 2/16 co-counsel meeting re PMK and ED depositions; commenting thereon.	0.1	
2/16/2021	BBK	Reviewing Ds' response re scheduling depositions; conferring w/ co-counsel re proposed answer thereto.	0.2	
2/16/2021	AX	Strategy meeting with team re: ED depositions and PMK deposition topics.	0.5	
2/16/2021	AX	Circulate notes of meeting.	0.5	
2/16/2021	AX	Correspondence re: ED deposition timing.	0.3	
2/17/2021	GCG	Communications w/ team re defendant's insistence on plaintiffs' depositions.	0.1	
2/17/2021	GCG	Legal research re in-person preparation.	0.1	
2/17/2021	BBK	Reviewing Ds' email re depositions; conferring w/ co-counsel re same.	0.2	
2/17/2021	BBK	Reviewing/commenting on M. Johnson draft discovery letter brief to compel depositions of EDs.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/17/2021	BBK	Participating in co-counsel meeting on depositions.	0.5	
2/17/2021	BBK	Conferring w/ AX re subpoenas for pendant call data.	0.1	
2/17/2021	BBK	Reviewing/commenting on PMK deposition notice.	0.2	
2/17/2021	BBK	Conferring w/ team re locating and serving deposition subpoenas for former Exec Dirs no longer employed by BD.	0.1	
2/17/2021	BBK	Reviewing Ds' revisions to Ds' portion of joint discovery letter brief re expert photographs.	0.1	
2/17/2021	JSY	Emails re depositions.	0.1	
2/17/2021	JSY	Emails re deposition schedules and meet and confer.	0.2	
2/17/2021	AX	Call w/ MJ re: pendant response time third party subpoenas.	0.3	
2/17/2021	AX	Correspondence w/ team re: ED deposition scheduling.	0.2	
2/17/2021	AX	Meeting with team re: plaintiff and ED depositions.	0.5	
2/17/2021	AX	Correspondence w/ team re: Tracy ED.	0.2	
2/17/2021	AX	Review team correspondence re: plaintiff deposition meet and confer efforts.	0.1	
2/17/2021	KES	Review emails re documents subpoenas and preliminary research re agents for service.	0.6	
2/17/2021	EH	Correspondence with potential putative class member re experiences of stepmother at Brookdale Folsom.	0.4	
2/17/2021	EH	Analysis of DSS complaints for Brookdale facilities.	0.8	
2/18/2021	GCG	Emails to MJ, AX and team re defendant's request for plaintiff depositions.	0.1	
2/18/2021	GCG	Emails to AX and team re motion to file successor-in-interest declarations.	0.1	
2/18/2021	BBK	Conferring w/ co-counsel and RBGG team re Ds' accessibility expert on facility inspections.	0.1	
2/18/2021	BBK	Conferring w/ J. Carlson and P. Lindstrom re Ds' request for depositions.	0.6	
2/18/2021	BBK	Conferring w/ co-counsel re M&C w/ Ds on Ps' depositions and obtaining dates for ED depositions.	0.4	
2/18/2021	BBK	Reviewing G. Wallace proposed assignments for PMK deposition topics.	0.1	
2/18/2021	BBK	Conferring w/ AX/JSY re scheduling depositions of Ps and EDs.	0.2	
2/18/2021	BBK	Conferring w/ AX/JSY re successor-in-interest declarations for representatives of Ps who have died.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/18/2021	BBK	Conferring w/ co-counsel re Ds' request to M&C on 2/22 re Ps' depositions.	0.2	
2/18/2021	JSY	Emails re deposition schedules; email ML re same.	0.1	
2/18/2021	JSY	Emails re successor in interest declarations.	0.1	
2/18/2021	AX	Team correspondence re: plaintiff depositions prior to class certification and meet and confer efforts.	0.3	
2/18/2021	AX	Team correspondence re: successor in interest issue, admin motion, and proposed order.	1.5	
2/18/2021	AX	Draft Loresia Vallette successor in interest declaration and related documents and prepare for filing.	0.8	
2/18/2021	AX	Correspondence w/ team re: pendant company third party subpoenas.	0.3	
2/18/2021	AX	Review documents relevant to pendant response times from Brookdale discovery.	0.5	
2/18/2021	KES	Prepare declaration for filing and emails with team re same.	0.5	
2/18/2021	KES	Continue job title analysis project.	1.4	
2/18/2021	EH	Analysis of DSS complaints for Brookdale facilities.	2.6	
2/18/2021	EH	Correspondence with putative class member re Brookdale Oceanside and Brookdale San Marcos facilities.	0.2	
2/19/2021	GCG	Team meeting to discuss depositions of plaintiffs and EDs and document review.	0.4	
2/19/2021	GCG	Emails to MJ and GM re discovery disputes.	0.1	
2/19/2021	GCG	Email to EH re CM declaration.	0.1	
2/19/2021	BBK	Reviewing AX report re action items to prep for PMK deposition.	0.1	
2/19/2021	BBK	Participating in RBGG team meeting on case strategy and next steps.	0.5	
2/19/2021	BBK	Reviewing M. Johnson-G. Maatman meet and confer emails re: outstanding discovery and scheduling depositions; conferring w/ JSY/AX re same.	0.2	
2/19/2021	BBK	Conferring w/ EH re analysis of DSS complaints.	0.1	
2/19/2021	BBK	Conferring w/ co-counsel and team re serving deposition subpoena on former ED SR.	0.1	
2/19/2021	BBK	Meeting w/ co-counsel re doc analysis and PMK depositions.	1.5	
2/19/2021	JSY	Team meeting.	0.4	
2/19/2021	JSY	Emails re ED depositions and client depositions.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/19/2021	JSY	Update ROG responses.	2.0	
2/19/2021	AX	Correspondence w/ TC re: third party subpoena issues.	0.1	
2/19/2021	AX	Strategy meeting with team re: discovery, document review, PMK deposition planning issues.	1.5	
2/19/2021	AX	Email correspondence w/ team re: PMK deposition topics and related projects.	0.8	
2/19/2021	AX	Email correspondence w/ team re: case tasks.	0.2	
2/19/2021	AX	Correspondence w/ RS re: hot documents for ED depositions.	0.2	
2/19/2021	KES	Participate in Zoom meeting with co-counsel re document review and deposition prep.	1.7	
2/19/2021	KES	Team meeting re case tasks.	0.5	
2/19/2021	KES	Westlaw research re address of ED deponent.	0.3	
2/19/2021	EH	Analysis of DSS complaints for Brookdale facility.	0.5	
2/21/2021	GCG	Review draft discovery letter brief re expert photos.	0.1	
2/21/2021	GCG	Review emails to MJ and GM re various discovery disputes.	0.1	
2/22/2021	BBK	Reviewing M. Johnson meet and confer emails w/ Ds re depositions of named Plaintiffs and outstanding documents.	0.1	
2/22/2021	BBK	Conferring w/ RBGG team re E.D. depositions.	0.1	
2/22/2021	JSY	Emails re ED depositions.	0.1	
2/22/2021	AX	Review team correspondence re: DSS subpoenas.	0.2	
2/22/2021	AX	Review team correspondence re supplemental class list.	0.1	
2/22/2021	AX	Review article re: elder abuse in Riverside facility.	0.1	
2/22/2021	AX	Emails re: depositions of named plaintiffs w/ opposing counsel.	0.2	
2/22/2021	AX	Correspondence w/ TC re: pendant subpoena issues.	0.1	
2/22/2021	AX	Correspondence w/ team re: Brookdale billing detail by revenue.	0.1	
2/22/2021	AX	Correspondence w/ team re: ED deposition notices.	0.2	
2/22/2021	AX	Review EH draft of declaration and correspondence re same.	0.2	
2/23/2021	GCG	Conf w/ JSY and emails to BBK and team re ED deposition preparation.	0.1	
2/23/2021	BBK	Conferring w/ team re ED depositions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/23/2021	BBK	Reviewing E. Olivares report re analysis of BD training documents.	0.1	
2/23/2021	AX	Call w/ TC re: third party subpoena issues.	0.5	
2/23/2021	AX	Review team correspondence and documents re: Brookdale norms and community customizations.	0.3	
2/23/2021	AX	Review memo re: document review of training documents.	0.5	
2/23/2021	KES	Calendar deposition dates and review emails re same; update electronic files re same.	0.5	
2/23/2021	EH	Analyzed DSS complaints for Brookdale facilities.	1.2	
2/24/2021	BBK	Conferring w/ team re document analysis for deposition prep.	0.1	
2/24/2021	JSY	Conf. w/ AX re successor in interest issue.	0.2	
2/24/2021	AX	Legal research re: substitution of parties and FRCP 25(a).	3.2	
2/24/2021	AX	Correspondence w/ team re: same.	1.0	
2/24/2021	AX	Review documents re: ED depositions and coordination issues.	0.5	
2/24/2021	AX	Email correspondence re: plaintiff depositions.	0.2	
2/24/2021	KES	Review co-counsel Sharepoint files and email team re procedure going forward.	0.4	
2/24/2021	EH	Analyzed DSS complaints for Brookdale facilities.	1.6	
2/25/2021	BBK	Conferring w/ AX re meet and confer on Ps' depositions.	0.1	
2/25/2021	BBK	Conferring w/ AX and JSY re motion for substitution of parties for Ps who have died.	0.2	
2/25/2021	BBK	Reviewing AX report to team re SDTs for call pendant data.	0.1	
2/25/2021	JSY	Emails re successor in interest issue.	0.2	
2/25/2021	AX	Email correspondence re: preparation for meet and confer.	0.2	
2/25/2021	AX	Attend meet and confer.	1.1	
2/25/2021	AX	Debrief call w/ TC, MJ re meet and confer.	0.3	
2/25/2021	AX	Email correspondence w/ team re: summary of meet and confer call.	0.3	
2/25/2021	AX	Correspondence w/ team re: plaintiff substitution and successor in interest issue.	0.8	
2/25/2021	AX	Draft memo and subpoena attachment re: pendant response third party subpoena.	2.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/25/2021	KES	Update and refine Relativity searches to capture all potential personnel reports from all productions; review and code uncoded documents in connection with same; review coded documents to determine relevancy of additional personnel reports not already gathered.	8.0	
2/25/2021	EH	Analyzed DSS complaints for Brookdale Facilities.	2.5	
2/26/2021	GCG	Review MJ email to GM re need to move class cert. deadline.	0.1	
2/26/2021	GCG	Confs w/ JSY and AX and email to GW, KS and MJ re meeting to discuss deceased plaintiffs.	0.3	
2/26/2021	BBK	Reviewing M. Johnson M&C email to Ds re personnel reports omitted from Brookdale's doc production; request for deposition dates for corporate BD individuals.	0.1	
2/26/2021	BBK	Conferring w/ EH re status of DSS complaints analysis.	0.1	
2/26/2021	BBK	Reviewing AX memo on 2/25 meet and confer on Ps' depositions.	0.1	
2/26/2021	BBK	Conferring w/ JSY and AX re M&C on Ps' depositions and motion for substitution.	0.1	
2/26/2021	BBK	Reviewing M Johnson request to stipulate to further extension of class cert motion deadline.	0.1	
2/26/2021	BBK	Conferring w/ AX re prep for ED depositions.	0.1	
2/26/2021	BBK	Conferring w/ RBGG team re substituting plaintiffs.	0.2	
2/26/2021	JSY	Conf. w/ GCG re successor in interest issue; research re same.	1.0	
2/26/2021	AX	Strategy meeting with MJ and document review team re: discovery review.	1.3	
2/26/2021	AX	Review memos and documents from meeting.	0.5	
2/26/2021	AX	Correspondence w/ team re: case tasks.	0.3	
2/26/2021	AX	Correspondence w/ team re: ED depositions and coordination issues.	0.5	
2/26/2021	AX	Call w/ GCG re successor in interest issue and case tasks.	0.2	
2/26/2021	AX	Email correspondence w/ team re: same.	0.3	
2/26/2021	KES	Participate in Zoom conference with co-counsel re document review and ED depo prep.	0.6	
2/26/2021	KES	Continued relativity searches and document review for class cert. motion.	5.0	
2/27/2021	GCG	Fact research; review CEO quarterly call transcript.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2021	GCG	Email to GW, MJ and team re same and re call to discuss death of named plaintiffs.	0.1	
2/28/2021	GCG	Emails to AX and team re substitution of plaintiffs and meeting to discuss same.	0.2	
2/28/2021	GCG	Review and analyze legal research re same.	0.3	
2/28/2021	BBK	Conferring w/ JSY/AX/GCG re substitution of parties.	0.2	
2/28/2021	JSY	E-mails w/ team re successor in interest issue.	0.3	
2/28/2021	AX	Email correspondence w/ team re: successors in interest; review Rutter Guide and other treatises re same.	1.5	
3/1/2021	GCG	Review and comment on draft letter brief to obtain plaintiff depositions before class cert.	0.2	
3/1/2021	BBK	Reviewing M. Johnson report re contents of recent BD document productions.	0.1	
3/1/2021	BBK	Reviewing M. Johnson - G. Maatman comm'ns re production of class member identities & request to extend class cert deadline.	0.1	
3/1/2021	BBK	Reviewing draft joint letter brief seeking protective order against Ps depositions; conducting factual research for proposed changes thereto.	0.8	
3/1/2021	AX	Correspondence w/ team regarding joint letter brief on plaintiff depositions, including review of draft (.4).	0.4	
3/1/2021	EH	Analysis of DSS complaints against Brookdale facilities.	4.2	
3/2/2021	GCG	Emails to MJ and team re defendant's offer to sample current residents.	0.1	
3/2/2021	GCG	Emails to BBK and team re letter brief re plaintiffs' depositions.	0.1	
3/2/2021	GCG	Review emails to MJ and GM re various discovery disputes.	0.2	
3/2/2021	GCG	Conf w/ MJ and AX and email to JSY re plaintiffs' motion for substitution.	0.5	
3/2/2021	GCG	Conf w/ and email to KS re same.	0.5	
3/2/2021	GCG	Conf w/ and email to AX re briefing re same.	0.2	
3/2/2021	BBK	Reviewing M&C emails re discovery disputes; conferring w/ team re same.	0.1	
3/2/2021	BBK	Drafting revisions/additions to draft joint letter brief on Ps' depositions; conferring w/ co-counsel re same.	1.2	
3/2/2021	BBK	Conferring w/ team re substitution of parties motion.	0.1	
3/2/2021	JSY	Emails re trust documents for successors in interest.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/2/2021	JSY	Emails re successor in interest issue.	0.1	
3/2/2021	JSY	Emails re Sunrise class certification order.	0.1	
3/2/2021	AX	Call w/ GCG re: case issues.	0.3	
3/2/2021	AX	Call w/ GCG and MJ re deceased plaintiffs.	0.5	
3/2/2021	AX	Legal research and draft motion re: substitution issues.	3.4	
3/2/2021	AX	Email correspondence w/ team re: trust agreements for plaintiffs and review of same.	0.3	
3/2/2021	AX	Email correspondence w/ team re: substitution motion issues.	0.2	
3/2/2021	AX	Review correspondence w/ team and opposing counsel re: meet and confer issues.	0.3	
3/2/2021	KES	Revise Relativity searches for facility personnel reports, download, organize and review additional personnel reports for all facilities for class period; summarize existing reports for discovery email.	6.0	
3/2/2021	EH	Analysis of DSS complaints against Brookdale facilities.	4.4	
3/3/2021	GCG	Emails to MJ and JM re missing documents.	0.2	
3/3/2021	GCG	Conf w/ GW and MJ re proposed stipulation to extend class cert deadline.	0.2	
3/3/2021	GCG	Emails to JSY and team re same and re substitution of plaintiffs.	0.2	
3/3/2021	BBK	Reviewing Ds' response to Ps' request to extend class cert deadline; conferring w/ team re dispute over personnel records.	0.1	
3/3/2021	BBK	Reviewing order denying class cert in Sunrise case.	0.1	
3/3/2021	BBK	Reviewing comm'ns re subpoenaing call pendant data; reviewing M. Johnson update re BD "norms" for task times.	0.1	
3/3/2021	AX	Communication w/ team re: remote deposition issues and US legal support.	0.8	
3/3/2021	AX	Communication with Titan re: service issues.	0.5	
3/3/2021	AX	Draft cover letter to third party subpoena.	0.5	
3/3/2021	AX	Prepare for ED depositions and review documents.	1.5	
3/3/2021	AX	Research and draft substitution motion.	1.0	
3/3/2021	EH	Analysis of DSS complaints against Brookdale facilities.	3.9	
3/4/2021	GCG	Conf w/ and email to AX re substitution of plaintiffs and deposition subpoenas to pendant companies.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/4/2021	BBK	Reviewing revisions to joint discovery letter on expert photographs during inspections of BD facilities.	0.2	
3/4/2021	JSY	Emails re document re Brookhurst.	0.1	
3/4/2021	AX	Draft and finalize third party subpoenas.	2.8	
3/4/2021	AX	Email correspondence w/ team re: pendant response documents.	0.2	
3/4/2021	AX	Correspondence w/ team re: service of third party subpoenas.	0.2	
3/4/2021	AX	Correspondence w/ team re: case tasks and meeting times.	0.2	
3/4/2021	AX	Review documents and prepare for ED deposition.	0.8	
3/4/2021	AX	Call w/ KES re: case issues including third party subpoenas.	0.5	
3/4/2021	AX	Emails w/ team re: successor in interest issue.	0.5	
3/4/2021	AX	Call w/ GCG re: case issues.	0.3	
3/4/2021	AX	Call w/ MJ re case issues.	0.1	
3/4/2021	KES	Download and organize additional facility personnel reports from updated searches and analyze job titles for same in job title chart.	4.2	
3/4/2021	EH	Analysis of DSS complaints against Brookdale facilities.	2.7	
3/4/2021	EH	Correspondence with putative class member re Brookdale Folsom.	0.2	
3/5/2021	GCG	Draft email to KS re successor in interest issues.	0.2	
3/5/2021	GCG	Review emails to JSY and team re preparation for ED depositions.	0.1	
3/5/2021	BBK	Conferring w/ JSY/AX re prep for ED depositions.	0.3	
3/5/2021	BBK	Conferring w/ JSY/AX re contact from named Plaintiff Jestrabek-Hart.	0.2	
3/5/2021	BBK	Conferring w/ JSY/AX re depositions of plaintiffs.	0.1	
3/5/2021	BBK	Conferring w/ opposing counsel re scheduling/noticing deposition of ED Buot; conferring w/ M. Johnson and G. Wallace re same.	0.3	
3/5/2021	BBK	Conferring w/ EH re analysis of DSS complaints and internal BD complaints.	0.2	
3/5/2021	JSY	Emails with team re documents for ED depositions.	0.2	
3/5/2021	JSY	Meet with AX re ED depo prep.	0.9	
3/5/2021	AX	Finalize and send third party subpoenas.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/5/2021	AX	Email correspondence w/ team re: review of produced documents and depositions.	0.4	
3/5/2021	AX	Strategy meeting with JSY re: same.	1.0	
3/5/2021	AX	Correspondence w/ US Legal and team re: depositions.	0.5	
3/5/2021	AX	Email correspondence w/ RS re: class member outreach.	0.3	
3/5/2021	AX	Call w/ named plaintiff re: issues at Scotts Valley.	0.8	
3/5/2021	AX	Correspondence w/ team re: same.	0.2	
3/5/2021	KES	Finalize and serve notice of issuance of subpoenas and email AX re same.	0.4	
3/5/2021	EH	Analyzed DSS complaints against Brookdale facilities.	1.9	
3/6/2021	BBK	Reviewing GCG email to K. Stebner re deceased Ps.	0.1	
3/7/2021	JSY	Review documents re KA deposition.	3.0	
3/7/2021	AX	Email correspondence w/ team re: documents for depositions.	0.6	
3/8/2021	GCG	Factual research for CC motion.	0.1	
3/8/2021	GCG	Conf w/ BBK re ED deposition.	0.2	
3/8/2021	GCG	Review MJ email to GM re class cert. schedule.	0.1	
3/8/2021	GCG	Conf w/ declarant re Fontaingrove issues.	0.4	
3/8/2021	GCG	Email to EH and team re same.	0.1	
3/8/2021	BBK	Conferring by phone w/ GCG re depositions.	0.1	
3/8/2021	BBK	Reviewing M. Johnson - G. Maatman comm'ns re draft letter breifs on expert photographs and Ps' depositions + stipulation to extend class cert deadline.	0.1	
3/8/2021	BBK	Reviewing comm'ns re class cert declarations and contact w/ named P.	0.1	
3/8/2021	AX	Correspondence w/ team re: named plaintiffs.	0.2	
3/8/2021	AX	Review job description and org chart documents for deposition.	0.5	
3/8/2021	AX	Review personnel and labor detail reports.	0.6	
3/8/2021	AX	Review Brookdale policies and procedures.	1.0	
3/8/2021	AX	Draft deposition outline.	1.3	
3/8/2021	CEJ	(Billing Judgment) Supplemental conflicts check.	0.0	0.1
3/8/2021	EH	Reviewed and organized research article to file.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/8/2021	EH	Correspondence with relative of resident at Brookdale Fountaingrove re class cert declaration.	0.2	
3/8/2021	EH	Analysis of DSS complaints against Brookdale facilities.	2.2	
3/9/2021	BBK	Reviewing M. Johnson - G. Maatman comm'ns re inadequacy of Ds' interrogatory responses; conferring w/ M. Johnson re M&C re same.	0.1	
3/9/2021	BBK	Drafting proposal to co-counsel re setting ED Buot deposition; conferring w/ co-counsel re same.	0.3	
3/9/2021	BBK	Conferring w/ co-counsel and RBGG team re 3/10 meeting on depositions.	0.1	
3/9/2021	BBK	Conferring w/ JSY and AX re ED deposition prep.	0.2	
3/9/2021	BBK	Reviewing M. Johnson report re M&C w/ Ds on inadequate interrogatory responses.	0.1	
3/9/2021	BBK	Drafting/sending email to Ds re noticing ED Buot deposition; conferring w/ co-counsel re same.	0.4	
3/9/2021	JSY	Prep for Ateian deposition; emails re same.	2.2	
3/9/2021	AX	Correspondence w/ team re: remote deposition training.	0.5	
3/9/2021	AX	Correspondence w/ team re: task time, issue registers, and other case issues.	0.3	
3/9/2021	AX	Review training documents and correspondence re same.	0.5	
3/9/2021	AX	Review service alignment best practices documents.	0.3	
3/9/2021	AX	Draft deposition outline.	3.2	
3/10/2021	GCG	Emails to JSY and team re preparation for ED depositions.	0.1	
3/10/2021	BBK	Conferring w/ KES re preparing deposition notice for ED Ferdinand Buot; reviewing/revising same.	0.3	
3/10/2021	BBK	Conferring w/ JSY/AX re deposition preparations.	0.2	
3/10/2021	BBK	Meeting on depositions w/ JSY, AX, T. Close, R. Steyer and B. Umpierre.	0.9	
3/10/2021	BBK	Conferring w/ co-counsel re serving deposition notice for ED Buot.	0.1	
3/10/2021	BBK	Conferring w/ KES re service of depo notice for ED Buot.	0.2	
3/10/2021	BBK	Conferring w/ co-counsel re remote depositions.	0.2	
3/10/2021	JSY	Meeting re depositions.	0.8	
3/10/2021	JSY	Draft Ataeian depo outline.	0.6	
3/10/2021	AX	Demo of remote depo platform.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/10/2021	AX	Strategy meeting with team re: depositions and documents.	0.4	
3/10/2021	AX	Email correspondence w/ team re: same.	0.8	
3/10/2021	AX	Email correspondence re: third party subpoenas.	0.2	
3/10/2021	AX	Review emails and documents re: MH.	2.4	
3/10/2021	AX	Draft deposition outline.	1.5	
3/10/2021	AX	Emails w/ cocounsel re: class member outreach.	0.3	
3/11/2021	GCG	Conf w/ and email to MJ re brief requesting CMC to discuss class cert. schedule.	0.2	
3/11/2021	GCG	Conf w/ BBK re plan for ED depositions.	0.1	
3/11/2021	BBK	Conferring w/ GCG re ED depositions.	0.1	
3/11/2021	BBK	Conferring w/ AX and JSY re deposition prep.	0.1	
3/11/2021	BBK	Conferring w/ AX and KES re ED Buot deposition logistics.	0.2	
3/11/2021	JSY	Draft ED deposition outline.	4.0	
3/11/2021	JSY	Messages and emails with JA re payment issue and re deposition.	0.2	
3/11/2021	AX	Correspondence w/ team re: demo for deposition prep.	0.2	
3/11/2021	AX	Review documents and prepare for ED depositions.	3.2	
3/11/2021	KES	Schedule court reporter for ED Buot deposition and email team re details.	0.3	
3/11/2021	EH	Analysis of DSS complaints against Brookdale facilities.	3.1	
3/12/2021	GCG	Team meeting to discuss deposition preparation and document review.	0.5	
3/12/2021	BBK	Reviewing request for discovery CMC conference & Court Order setting CMC.	0.2	
3/12/2021	BBK	Conferring w/ P. Lindstrom and J. Carlson re status of dispute w/ Ds over timing of depositions of Ps.	0.3	
3/12/2021	BBK	Meeting w/ JSY, AX and co-counsel re ED depositions.	1.0	
3/12/2021	BBK	Meeting w/ RBGG team re case tasks.	0.4	
3/12/2021	BBK	Reviewing G. Maatman / M. Johnson comm'ns re logistics for ED depositions and finalizing joint discovery letter brief on P depositions.	0.1	
3/12/2021	BBK	Conferring w/ EH re analysis of DSS complaints.	0.1	
3/12/2021	BBK	Reviewing AX report re 3/12 meeting on doc analysis.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2021	BBK	Conferring w/ AX and JSY re prep for ED depositions.	0.2	
3/12/2021	JSY	Demo re deposition exhibits.	0.7	
3/12/2021	JSY	Team meeting.	0.5	
3/12/2021	JSY	Prep for Ataeian deposition; draft outline re same; emails re same.	1.1	
3/12/2021	AX	Meeting with document review team re: review of discovery.	1.1	
3/12/2021	AX	Meeting w/ team re: US Legal IE+ demo.	1.0	
3/12/2021	AX	Draft correspondence to team re: overview of document review meeting.	0.6	
3/12/2021	AX	Strategy meeting re: ED depositions and other case tasks.	0.5	
3/12/2021	AX	Correspondence w/ team re: documents.	0.5	
3/12/2021	AX	Draft deposition outline.	1.0	
3/12/2021	KES	Download and circulate pleadings and update calendar re same.	0.2	
3/12/2021	KES	Participate in remote depo training with US Legal in preparation for upcoming depositions.	1.0	
3/12/2021	KES	Review marketing materials for representations made by Brookdale.	0.3	
3/12/2021	KES	Participate in Zoom document review meeting with co-counsel.	1.4	
3/12/2021	KES	Internal team meeting re upcoming depositions.	0.5	
3/12/2021	EH	Analyzed DSS complaints against Brookdale Facilities.	3.6	
3/13/2021	BBK	Reviewing AX/JSY/G. Wallace comm'ns re prep for ED depositions.	0.1	
3/13/2021	JSY	Draft outline for Ataiean outline.	2.0	
3/13/2021	AX	Email communication with team re: ED depositions; draft deposition outline and review documents.	1.7	
3/14/2021	GCG	Legal research re class certification.	0.2	
3/14/2021	GCG	Email JSY, KES and team re same, re deposition preparation and re substitution issues.	0.2	
3/14/2021	BBK	Reviewing draft joint discovery letter brief on depositions of Ps.	0.1	
3/14/2021	JSY	Review class cert order in similar case; emails re same.	0.3	
3/14/2021	JSY	Draft outline of Ataiean deposition outline.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/15/2021	GCG	Emails to KS and team re substitution of counsel.	0.1	
3/15/2021	GCG	Research re AG's lawsuit against Brookdale over SNFs.	0.2	
3/15/2021	GCG	Emails to GW and team re same.	0.1	
3/15/2021	BBK	Reviewing NY Times article re CA lawsuit against BD for submitting false staffing info to Medicare; conferring w/ team re import on our case.	0.1	
3/15/2021	BBK	Reviewing class cert order in MacRae v. HCR Manor Care Services.	0.2	
3/15/2021	BBK	Reviewing M. Johnson email to Ds re omission of key docs re BD norms and task time studies.	0.1	
3/15/2021	BBK	Conferring w/ JSY and AX re ED depositions.	0.3	
3/15/2021	BBK	Conferring w/ co-counsel re ED depositions.	0.2	
3/15/2021	BBK	Preparing for deposition of ED Buot.	0.6	
3/15/2021	JSY	Prep for KA deposition; emails re same.	4.5	
3/15/2021	AX	Revise AW declaration.	1.5	
3/15/2021	AX	Correspondence w/ team regarding call with JV.	0.1	
3/15/2021	AX	Correspondence w/ team regarding ED depositions and named plaintiffs.	0.5	
3/15/2021	AX	Review documents shared from co-counsel, including deposition exhibits.	2.5	
3/15/2021	AX	Draft deposition outline.	1.8	
3/15/2021	KES	Review and update personnel report spreadsheet; email team with summary of most typical Brookdale job descriptions.	2.5	
3/15/2021	EH	Research counsel in lawsuit against Brookdale.	0.4	
3/16/2021	GCG	Conf w/ and email to JSY re preparing for ED depositions and doc production.	0.2	
3/16/2021	GCG	Conf w/ expert JV, KS, DV and AX re approach to deceased plaintiffs.	0.9	
3/16/2021	GCG	Conf w/ and email to AX re same.	0.1	
3/16/2021	BBK	Conferring w/ EH re analysis of DSS complaints and citations.	0.1	
3/16/2021	BBK	Conferring w/ litigation team re Plaintiff supplemental document production.	0.2	
3/16/2021	BBK	Analyzing draft depo outlines in prep for Buot depo.	1.6	
3/16/2021	BBK	Conferring w/ AX re substitution of parties motion.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 369

SERVICES

Date	Person	Description of Services	Hours	Discount
3/16/2021	BBK	Reviewing docs for supp doc production; conferring w/ R. Bonner re same.	0.3	
3/16/2021	JSY	Prep for KA depo; emails re same.	3.2	
3/16/2021	AX	Call w/ JV, KS, GCG regarding successor in interest issues.	0.5	
3/16/2021	AX	Call w/ GCG regarding same.	0.2	
3/16/2021	AX	Correspondence w/ team regarding same and review of client trust documents.	1.0	
3/16/2021	AX	Correspondence w/ team regarding supplemental document production and review of additional documents.	0.8	
3/16/2021	AX	Review GW draft outline and exhibits.	0.8	
3/16/2021	KES	Emails with team and co-counsel re production of additional client documents and review Relativity information re same.	0.6	
3/16/2021	KES	Gather and review potential exhibits for JY deposition of ED Kimia Ataeian.	5.0	
3/17/2021	GCG	Conf w/ JSY and emails to AX and team re 1st deposition.	0.2	
3/17/2021	GCG	Follow up conf w/ GW, MJ, RS, JSY, AX and TC re same.	0.4	
3/17/2021	BBK	Conferring w/ litigation team re updated BD polices and procedures produced days before depositions.	0.1	
3/17/2021	BBK	Conferring w/ JSY re deposition outlines.	0.1	
3/17/2021	BBK	Conferring w/ JSY and AX re Ward deposition.	0.2	
3/17/2021	BBK	Preparing for Buot deposition; conferring w/ AX re same.	0.5	
3/17/2021	BBK	Observing part of Ward Deposition.	2.4	
3/17/2021	BBK	Reviewing AX high level report on Ward Deposition.	0.1	
3/17/2021	BBK	Meeting w/ litigation team re Ward Deposition debrief.	0.4	
3/17/2021	JSY	Prep for KA deposition; observe part of TW depo as preparation; draft outline re KA deposition; meeting with group re same.	8.0	
3/17/2021	AX	Attend deposition of TW and related communication w team.	7.2	
3/17/2021	AX	Draft summary email to team.	0.5	
3/17/2021	AX	Strategy call w/ team.	0.4	
3/17/2021	AX	Strategy call w/ JY.	0.2	
3/17/2021	AX	Email communication re: substitution motion.	0.2	
3/17/2021	KES	Download exhibits and update index of all exhibits marked during Day 1 of ED depos.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/17/2021	KES	Review and analyze doc type marketing materials for representations made by Brookdale.	1.5	
3/17/2021	KES	Review and update potential exhibits for JY deposition of ED Kimia Ataeian.	1.0	
3/18/2021	GCG	Conf w/ JSY and communications w/ co-counsel re deposition and court appearance re class certification schedule.	0.4	
3/18/2021	BBK	Conferring w/ JSY and AX re Ataiean Deposition.	0.3	
3/18/2021	BBK	Reviewing JSY report re Ataiean Deposition & conferring w/ litigation team re same.	0.2	
3/18/2021	BBK	Reviewing G. Wallace report re discovery hearing before LB and minute order re same.	0.1	
3/18/2021	BBK	Preparing for Buot Deposition; conferring w/ AX re same.	0.3	
3/18/2021	JSY	Depo of KA; draft summary of depo for team re same.	9.0	
3/18/2021	AX	Team correspondence re: successor in interest issues.	0.2	
3/18/2021	AX	Observe Kimia Ataein deposition.	1.5	
3/18/2021	AX	Team correspondence re: rate increases.	0.3	
3/18/2021	AX	Prepare deposition outline and review and analyze related documents in preparation for MH deposition.	3.7	
3/18/2021	KES	Download and circulate pleading.	0.1	
3/18/2021	KES	Review status of ED depo exhibits.	0.2	
3/18/2021	EH	Revised class cert declaration for putative class member re Brookdale Oceanside and San Marcos facilities.	0.9	
3/19/2021	GCG	Emails to GW and team re 30(b)(6) deposition topics.	0.1	
3/19/2021	GCG	Email to JSY re Judge Beeler order re class cert schedule and plaintiffs' deposition.	0.1	
3/19/2021	BBK	Conferring w/ litigation team re 30(b)(6) depositions.	0.2	
3/19/2021	BBK	Conferring w/ litigation team re meeting on class cert plan.	0.1	
3/19/2021	BBK	Reviewing Court's Order on discovery disputes and request for class cert extension.	0.1	
3/19/2021	BBK	Reviewing Ps' draft discovery letter brief re Ds' refusal to answer Carlson Rogs.	0.1	
3/19/2021	BBK	Reviewing ED depo outlines in prep for ED Buot depo.	3.7	
3/19/2021	JSY	Conf. w/ AX re depo prep and class cert prep; emails re same.	0.5	
3/19/2021	JSY	Emails re order re discovery and class cert.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2021	AX	Email correspondence re: third party subpoenas.	0.2	
3/19/2021	AX	Review rough transcript of TW deposition.	0.8	
3/19/2021	AX	Strategy meeting with MJ, GW and team re: class certification tasks and strategy for ED depositions.	1.0	
3/19/2021	AX	Correspondence w/ team re: same.	0.3	
3/19/2021	AX	Call w/ JY re: case tasks.	0.5	
3/19/2021	AX	Correspondence w/ team and analyze community revenue reports.	0.3	
3/19/2021	AX	Review ED benchmark enforcement emails.	1.5	
3/19/2021	AX	Review emails re: MH and advance customizations.	1.3	
3/19/2021	AX	Email correspondence w/ team and analysis re: 30b6 deposition topics.	0.8	
3/19/2021	AX	Draft and revise deposition outline.	1.0	
3/19/2021	KES	Zoom meeting with co-counsel re ED depos and document review.	1.0	
3/19/2021	KES	Review and gather DSS documents relating to San Ramon facility complaints, investigations and citations; begin review of DSS investigation docs for Scotts Valley in preparation for ED depos.	3.5	
3/19/2021	KES	Review emails from co-counsel circulating hot documents for ED depos.	0.2	
3/19/2021	EH	Call with relative of class member at Brookdale Fountaingrove re class cert declaration.	1.2	
3/20/2021	GCG	Review draft PMK deposition notice.	0.1	
3/20/2021	GCG	Email to GW, JSY and team re meeting to discuss class cert motion.	0.1	
3/20/2021	BBK	Analyzing BD doc productions.	2.4	
3/20/2021	AX	Prepare MH deposition outline and analyze deposition exhibits; review deposition transcripts.	1.6	
3/21/2021	GCG	Continued review and analysis of Rule 30(b)(6) notice and prepare for depositions.	0.5	
3/21/2021	GCG	Review and analyze Judge Beeler's March 19 order.	0.1	
3/21/2021	GCG	Emails to GW re class cert motion and co-counsel agreement.	0.1	
3/21/2021	GCG	Review MJ reports on discovery disputes and next steps.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/21/2021	BBK	Analyzing BD document productions in prep for ED Buot depo.	6.1	
3/21/2021	AX	Prepare MH deposition outline and analyze deposition exhibits.	7.4	
3/22/2021	GCG	Conf w/ KS re settlement.	0.4	
3/22/2021	GCG	Email to GW and KS re same.	0.1	
3/22/2021	GCG	Emails to AX and team re preparation for PMK and EO depositions.	0.2	
3/22/2021	GCG	Email to GW, KS and team re coordination w/ AG case against SNFS.	0.1	
3/22/2021	BBK	Conferring w/ litigation team re Buot deposition and meeting on class cert strategy.	0.2	
3/22/2021	BBK	Conferring w/ RBGG team re exhibits for ED depositions.	0.3	
3/22/2021	BBK	Conferring w/ litigation team re 30(b)(6) deposition and memory care plaintiffs.	0.1	
3/22/2021	BBK	Conferring w/ EH re class cert decls for Carlson and Lindstrom.	0.1	
3/22/2021	BBK	Drafting/sending email to opposing counsel requesting confirmation of Buot sitting for deposition on noticed date.	0.2	
3/22/2021	BBK	Analyzing BD document productions.	6.4	
3/22/2021	BBK	Reviewing opposing counsel's tardy report that Buot unavailable for noticed deposition; conferring w/ JSY and KES re same.	0.2	
3/22/2021	JSY	Emails re meeting re class cert.	0.1	
3/22/2021	AX	Draft and revise MH deposition outline and related correspondence with team.	2.5	
3/22/2021	AX	Gather and analyze statutory and regulatory authority in 30b6 deposition notice and send correspondence to team re same.	1.5	
3/22/2021	AX	Correspondence w/ Titan re service of subpoenas.	0.2	
3/22/2021	AX	Review GW comments and revisions to deposition outline.	1.0	
3/22/2021	AX	Analyze documents regarding BEST audits.	1.3	
3/22/2021	AX	Analyze named plaintiff documents.	1.2	
3/22/2021	KES	Begin gathering documents for Buot deposition exhibits.	0.5	
3/22/2021	KES	Email BBK re Buot depo date.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/22/2021	KES	Gather and organize Scotts Valley DSS files re complaints and citations during the class period for potential use at Harris depo.	2.7	
3/22/2021	KES	Confer AX re exhibits for Harris deposition.	0.3	
3/22/2021	KES	Organize all ED depo exhibits in electronic files.	0.3	
3/22/2021	KES	Emails co-counsel and AX re plaintiff production docs for use at Harris depo; review docs re same.	0.4	
3/23/2021	GCG	Confs w/ BBK and AX re preparation for ED depositions and status of PMK topics.	0.3	
3/23/2021	GCG	Email to GW and KS re settlement.	0.1	
3/23/2021	BBK	Brainstorming plan for ED deposition and 30(b)(6) depositions.	0.5	
3/23/2021	BBK	Conferring by phone w/ GCG re ED deposition and 30(b)(6) depositions.	0.2	
3/23/2021	BBK	Conferring w/ co-counsel re proposed response to opposing counsel re Buot deposition.	0.1	
3/23/2021	BBK	Conferring w/ opposing counsel re rescheduling Buot Deposition.	0.1	
3/23/2021	BBK	Conferring w/ KES and United Legal Support re rescheduling Buot Deposition; reviewing/approved Amended Notice of Deposition.	0.3	
3/23/2021	BBK	Conferring w/ JSY/AX re ED depositions.	0.3	
3/23/2021	BBK	Meeting w/ AX and GCG re Harris Deposition.	0.4	
3/23/2021	AX	Revise outline for MH deposition.	5.5	
3/23/2021	AX	Review and analyze deposition exhibits.	3.5	
3/23/2021	AX	Set up technology and troubleshoot related issues.	0.7	
3/23/2021	AX	Call with counsel for RF technologies re third party subpoena issues and correspondence re same.	0.6	
3/23/2021	KES	Emails with court reporter re rescheduled depo.	0.2	
3/23/2021	KES	Draft, finalize and serve amended notice of depo.	0.4	
3/23/2021	KES	Gather and review additional documents for potential deposition exhibits for MH.	3.0	
3/24/2021	GCG	Prepare for and conduct meeting w/ KS, GW and MJ re settlement overture from Brookdale; follow up emails re same.	0.7	
3/24/2021	GCG	Conf w/ AX and texts to JSY re ED deposition.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/24/2021	GCG	Prepare for PMK depositions.	0.2	
3/24/2021	GCG	Email to GW re motion to modify class cert schedule.	0.1	
3/24/2021	GCG	Review and analyze Sunrise class cert. decision; emails to team re same.	0.6	
3/24/2021	JSY	Emails re MH deposition.	0.1	
3/24/2021	BBK	Conferring w/ J. Carlson re Order on Plaintiff depositions and Buot Deposition.	0.3	
3/24/2021	BBK	Conferring w/ P. Carlson re Order on Plaintiff depositions.	0.2	
3/24/2021	BBK	Observing portion of Harris Deposition.	0.7	
3/24/2021	BBK	Conferring w/ AX re strategy for Harris Deposition.	0.3	
3/24/2021	BBK	Conferring w/ KES re prep for Buot Deposition.	0.1	
3/24/2021	BBK	Conferring w/ EH re class cert decls for P. Lindstrom and J. Carlson.	0.1	
3/24/2021	BBK	Reviewing GCG report re size of class that has opted out of arbitration.	0.1	
3/24/2021	BBK	Reviewing AX report re Harris Deposition.	0.1	
3/24/2021	AX	Prepare for deposition.	0.7	
3/24/2021	AX	Take deposition of MH.	7.0	
3/24/2021	AX	Correspondence w/ team re: same.	0.8	
3/24/2021	AX	Review rough transcript.	0.8	
3/24/2021	AX	Take deposition of MH.	7.0	
3/24/2021	KES	Emails with court reporter and team re March 25 deposition.	0.3	
3/24/2021	KES	Gather additional documents for MH depo.	1.4	
3/24/2021	KES	Review summary of Harris depo.	0.1	
3/24/2021	EH	Revising Brookdale Scotts Valley named plaintiff class cert declaration, incorporating additional information from ROG responses.	1.6	
3/24/2021	EH	Revising Brookdale Fountaingrove named plaintiff class cert declaration, incorporating additional information from ROG responses.	3.9	
3/24/2021	EH	Revising putative class member's class cert declaration re Brookdale Oceanside and San Marcos.	0.4	
3/25/2021	GCG	Review settlement in related case.	0.1	
3/25/2021	GCG	Email AX and team re pendant data.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/25/2021	GCG	Email from GW re injunctive relief.	0.1	
3/25/2021	BBK	Conferring w/ J. Carlson re class cert and depositions.	0.2	
3/25/2021	BBK	Reviewing Ds' letter objecting to 30(b)(6) deposition notice.	0.1	
3/25/2021	BBK	Revising draft Lindstrom class cert declaration.	1.4	
3/25/2021	BBK	Reviewing AX report re responses to SDTs for pendant data.	0.1	
3/25/2021	JSY	Emails re depositions.	0.1	
3/25/2021	AX	Email correspondence w/ team re PMK depositions.	0.1	
3/25/2021	AX	Email correspondence w/ team re: pendant response data.	0.5	
3/25/2021	AX	Call w/ Lifeline counsel re: subpoena and related email correspondence.	0.4	
3/25/2021	AX	Observe AR deposition.	1.5	
3/25/2021	KES	Continue review and gathering documents for Buot depo prep.	2.3	
3/26/2021	GCG	Team meeting w/ KES, EH, JSY and BBK re upcoming depositions.	0.5	
3/26/2021	GCG	Review and revise GW declaration and MPAs ISO motion to change class cert schedule.	0.5	
3/26/2021	GCG	Review and analyze ADA fees decision; email to GW re same.	0.2	
3/26/2021	GCG	Conf w/ EG and emails to partners re Brookdale settlement overture.	0.2	
3/26/2021	GCG	Review emails to MJ and JM re discovery disputes.	0.2	
3/26/2021	SJR	Email updates from GG.	0.2	
3/26/2021	BBK	Reviewing MJ report on Reddy Deposition.	0.1	
3/26/2021	BBK	Conferring w/ RBGG team re BD corporate depositions.	0.1	
3/26/2021	BBK	Reviewing AX memo on class damages and community fees; conferring w/ AX re same.	0.2	
3/26/2021	BBK	Analyzing Brookdale recent doc production.	0.3	
3/26/2021	BBK	Meeting w/ RBGG team re case strategy and upcoming tasks.	0.5	
3/26/2021	BBK	Revisions to Lindstrom class cert decl.	1.2	
3/26/2021	BBK	Reviewing draft motion for extension of time to file class cert motion and supporting declaration; conferring w/ co-counsel re proposed revisions thereto.	0.6	
3/26/2021	BBK	Conferring w/ team re ED testimony on BD training.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/26/2021	JSY	Team meeting; emails re depositions.	0.5	
3/26/2021	JSY	Edit GW declaration re extension request.	0.3	
3/26/2021	JSY	Email JA summary of KA deposition.	0.3	
3/26/2021	AX	Strategy meeting with team re: analysis of Brookdale document production.	1.0	
3/26/2021	AX	Call w/ counsel for RF technologies and related email correspondence.	0.5	
3/26/2021	AX	Follow up with Lifeline counsel re: third party subpoena.	0.2	
3/26/2021	AX	Email correspondence w/ vendors re: reissuing third party subpoenas.	0.2	
3/26/2021	AX	Review team correspondence re: various case topics and motion for modification of class cert schedule.	0.5	
3/26/2021	KES	Zoom meeting with co-counsel re document review and depositions.	1.1	
3/26/2021	KES	Team meeting re depositions, other class cert tasks.	0.7	
3/26/2021	KES	Schedule court reporter for Dolcater deposition and email team re same.	0.2	
3/26/2021	KES	Review emails gathered for Buot depo prep and email co-counsel re document for SA issue.	0.2	
3/26/2021	KES	Download and circulate motion.	0.1	
3/26/2021	EH	Team conference re class cert motion, outreach to class members, and depositions.	0.5	
3/26/2021	EH	Drafting class cert declaration for relative of former resident at Brookdale Fountaingrove.	2.3	
3/26/2021	EH	Outreach to two putative class members re experiences at BD Chatsworth and Folsom.	0.3	
3/29/2021	GCG	Prepare for and conduct meeting w/ SW re class cert pleadings and plan.	0.8	
3/29/2021	GCG	Follow up meeting w/ BBK and AX re discovery motions re pendant data and related missing documents.	0.4	
3/29/2021	GCG	Conf w/ ADA expert re evaluation issues.	0.2	
3/29/2021	GCG	Emails to ADA expert, GW and team re potential experts for class cert motion.	0.2	
3/29/2021	BBK	Conferring w/ litigation team re noticed depositions for BD executives.	0.1	
3/29/2021	BBK	Meeting w/ co-counsel re class cert strategy.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 377

SERVICES

Date	Person	Description of Services	Hours	Discount
3/29/2021	BBK	Reviewing MJ draft email proposing compromise on 30(b)(6) depositions & MJ M&C email re omission of task time studies from BD supplemental production.	0.1	
3/29/2021	BBK	Meeting w/ GCG and AX re upcoming case tasks.	0.3	
3/29/2021	BBK	Conferring w/ litigation team re: deposition transcripts, emergency evacuation experts.	0.1	
3/29/2021	AX	Team strategy conference re: class certification motion and related case tasks.	0.8	
3/29/2021	AX	Call w/ GCG and BBK re: same.	0.4	
3/29/2021	AX	Correspondence w/ team re: deposition transcripts.	0.2	
3/29/2021	AX	Correspondence w/ team re: Box file sharing.	0.2	
3/29/2021	AX	Correspondence w/ Lifeline counsel re: third party subpoena.	0.2	
3/29/2021	AX	Review and analyze Brookdale production re: org charts.	0.3	
3/29/2021	AX	Review and analyze emails re: Kevin Bowman.	0.5	
3/29/2021	AX	Review correspondence w/ team re: evacuation expert.	0.1	
3/29/2021	AX	Review team correspondence re: 30b6 deposition topics and upcoming employee depositions, including meet and confer efforts.	0.3	
3/29/2021	KES	Emails with court reporter and team re upcoming deposition dates and requests for expedited transcripts.	0.5	
3/29/2021	KES	Participate in Zoom meeting with co-counsel re class certification tasks.	1.0	
3/29/2021	EH	Conference with team and co-counsel re motion for class cert.	0.8	
3/29/2021	EH	Drafting class cert declaration for relative of class member's experiences at Brookdale Fountaingrove.	3.0	
3/30/2021	GCG	Review defendant's opp to motion for additional time.	0.1	
3/30/2021	GCG	Emails to AX and team re same.	0.1	
3/30/2021	BBK	Reviewing AX report re compelling production of pendant call data.	0.1	
3/30/2021	BBK	Reviewing Ds' opposition to motion for EOT to file class cert motion; conferring w/ RBGG team re same.	0.2	
3/30/2021	JSY	Review Opp re extension request; emails re same.	0.1	
3/30/2021	AX	Correspondence w/ team re: third party subpoenas.	0.2	
3/30/2021	AX	Correspondence w/ team re: opposition to EOT re: class certification schedule.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/30/2021	AX	Correspondence w/ team re: pendant response data letter brief.	0.2	
3/30/2021	AX	Draft letter brief re: pendant response data.	1.0	
3/30/2021	KES	Telephone conference with relative of Brookdale resident re understaffing and other issues; email team re follow up for declaration.	0.8	
3/30/2021	KES	Emails with court reporter and team re status of ED depo transcripts.	0.2	
3/30/2021	KES	Create new TextMap case and upload Ward transcript.	0.4	
3/30/2021	KES	Download and circulate Defs opposition to motion re class cert; review team emails re same.	0.2	
3/30/2021	KES	Check DSS site for recent incident at Uptown Whittier.	0.1	
3/30/2021	EH	Drafting class cert declaration for relative of former resident of Brookdale Fountaingrove.	3.0	
3/31/2021	GCG	Emails to GW, AX and team re potential response to ruling on request for additional time to file class cert motion.	0.4	
3/31/2021	GCG	Emails to AX and team re pendant data and motions to compel.	0.2	
3/31/2021	GCG	Review report of putative class member treatment.	0.1	
3/31/2021	BBK	Reviewing M&C emails between M. Johnson & G. Maatman re 30(b)(6) deposition, ROG responses, and outstanding documents.	0.1	
3/31/2021	BBK	Comm'ns w/ litigation team re writ of mandamus to appeal potential denial of request for EOT to file class cert motion.	0.1	
3/31/2021	BBK	Conferring w/ GCG and AX re class cert prep.	0.1	
3/31/2021	AX	Legal research re: writ standards, appealability of denial for extension of class certification time line, and related email correspondence.	2.5	
3/31/2021	AX	Legal research and draft letter brief re: pendant response data.	3.8	
3/31/2021	AX	Correspondence w/ team re: issuing 4Front subpoena.	0.5	
3/31/2021	AX	Correspondence w/ team re: case tasks and strategy meeting.	0.3	
3/31/2021	KES	Revise notice for document subpoena.	0.2	
3/31/2021	KES	Review, download and organize DSS documents for potential Buot depo exhibits.	2.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 379

SERVICES

Date	Person	Description of Services	Hours	Discount
3/31/2021	KES	Review email from potential declarant and confer EH re same.	0.1	
4/1/2021	GCG	Revise letter brief re pendant data.	0.5	
4/1/2021	GCG	Conf w/ and email to AX re revisions to same.	0.2	
4/1/2021	GCG	Confs w/ BBK, AX and KES re preparing for depositions.	0.4	
4/1/2021	BBK	Reviewing/revising AX draft discovery letter brief re call pendant data.	0.5	
4/1/2021	BBK	Conferring w/ litigation team re depositions of BD corporate employees; deposition transcripts from completed depos.	0.2	
4/1/2021	BBK	Meeting w/ GCG and AX re case strategy and tasks.	0.3	
4/1/2021	BBK	Drafting attorney declaration ISO class cert re DSS complaints and internal complaints.	0.6	
4/1/2021	BBK	Reviewing/analyzing BD docs.	1.0	
4/1/2021	BBK	Reviewing AX report to co-counsel re pendant data subpoena and motion to compel.	0.1	
4/1/2021	AX	Draft and revise letter brief regarding pendant response data, including legal research.	2.2	
4/1/2021	AX	Strategy meeting with BBK and GCG regarding case tasks.	0.4	
4/1/2021	AX	Call w GCG re letter brief.	0.3	
4/1/2021	AX	Call w counsel for Silversphere regarding subpoena.	0.5	
4/1/2021	AX	Email correspondence w/ Titan re service issues.	0.2	
4/1/2021	AX	Review Brookdale privilege log and draft related memo.	0.8	
4/1/2021	CEJ	(Billing Judgment) Email to GCG re conflicts check.	0.0	0.1
4/1/2021	EH	Drafting and revising declaration in support of motion for class cert for relative of resident at Brookdale Fountaingrove.	0.6	
4/1/2021	KES	Review and organize Fountaingrove DSS reports and other documents for Buot depo prep.	2.5	
4/1/2021	KES	Schedule new round of depositions with court reporter and email co-counsel re same.	0.4	
4/1/2021	KES	Follow up with court reporter re ED depo transcripts and email co-counsel with transcripts.	0.6	
4/1/2021	KES	Calendar depo dates.	0.2	
4/1/2021	KES	Follow up re potential declarant and update Sharepoint re same.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 380

SERVICES

Date	Person	Description of Services	Hours	Discount
4/2/2021	GCG	Meet w/ BBK, AX and KES to discuss Bowman emails and prep.	0.5	
4/2/2021	GCG	Emails to MJ and BBK re plaintiff's request for discovery conference.	0.2	
4/2/2021	BBK	Reviewing comm'ns w/ opposing counsel re outstanding docs.	0.1	
4/2/2021	BBK	Conferring w/ co-counsel re request for omnibus discovery conference.	0.1	
4/2/2021	BBK	Conferring w/ AX re request for omnibus discovery conference.	0.1	
4/2/2021	BBK	Reviewing Court Order setting CMC re request for EOT for class cert; conferring w/ team re same.	0.1	
4/2/2021	BBK	Reviewing G Wallace memo re key issues to establish in corporate BD depos.	0.1	
4/2/2021	BBK	Reviewing AX- G. Maatman comm'ns re joint letter brief on pendant data.	0.1	
4/2/2021	BBK	Meeting w/ RBGG BD team re case strategy and tasks.	0.6	
4/2/2021	BBK	Reviewing/revising Ps' Request for Discovery Management Conference; conferring w/ litigation team re same.	0.4	
4/2/2021	BBK	Reviewing/analyzing Fountaingrove Family Council meeting minutes and emails for production.	0.6	
4/2/2021	BBK	Conferring w/ GCG re production of Fountaingrove Family Council meeting minutes and emails.	0.1	
4/2/2021	AX	Strategy meeting with team regarding class cert issues.	1.0	
4/2/2021	AX	Meeting with GCG, KES, BBK regarding case tasks.	0.5	
4/2/2021	AX	Call w/ MJ regarding meet and Confer and third party subpoena.	0.2	
4/2/2021	AX	Email correspondence w counsel for Silversphere.	0.3	
4/2/2021	AX	Related email correspondence w/ TC, MJ regarding Brookdale divestment of facilities.	0.3	
4/2/2021	AX	Email correspondence w/ counsel regarding meet and Confer.	0.3	
4/2/2021	AX	Review pendant usage data.	0.5	
4/2/2021	AX	Revise meet and Confer letter.	0.8	
4/2/2021	AX	Review Brookdale privilege log.	0.5	
4/2/2021	AX	Review draft CMC statement.	0.3	
4/2/2021	KES	Participate in co-counsel and team Zoom meetings re doc review and depo prep.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/2/2021	KES	Follow up emails and tcs with team and court reporter re depo scheduling and transcripts from recently completed depo.	1.2	
4/2/2021	KES	Review Bowman documents in Relativity, run various searches to determine best review method and confer R. Bonner re same.	1.7	
4/2/2021	KES	Download and circulate discovery letter brief.	0.2	
4/3/2021	GCG	Initial review of MH depo transcript.	0.2	
4/3/2021	GCG	Review plaintiff's request for discovery conference.	0.2	
4/3/2021	GCG	Conf w/ and email to AX re meet and Conference w/ GM re pendant data.	0.1	
4/3/2021	GCG	Emails to GW and MJ re MJ Beeler order denying conference and upcoming conference w/ Judge Gilliam.	0.2	
4/4/2021	GCG	Emails to GW and team re DDO emails and implications for CC.	0.1	
4/5/2021	GCG	Conf w/ JSY and emails to team re preparation for Bowmen deposition.	0.3	
4/5/2021	BBK	Reviewing hot docs identified by co-counsel for depositions; conferring w/ team re same.	0.3	
4/5/2021	BBK	Reviewing/analyzing BD document productions relevant for class cert.	1.2	
4/5/2021	BBK	Conferring w/ RBGG team re prep for Bowman deposition.	0.1	
4/5/2021	BBK	Conferring w/ KES re master exhibit list from first 4 depositions.	0.1	
4/5/2021	BBK	Conferring w/ R. Bonner re AC privilege redactions needed before supp P doc production.	0.2	
4/5/2021	JSY	Emails re Bowman depo prep; conf. w/ GCG re same.	0.6	
4/5/2021	AX	Email correspondence w/ document review team re hot documents.	0.5	
4/5/2021	AX	Prepare for document review meeting to discuss Bowman depo.	0.3	
4/5/2021	KES	Organize master depo exhibits in electronic files and revise index re same.	2.3	
4/5/2021	KES	Emails with team re hot docs shared by co-counsel.	0.2	
4/5/2021	KES	Review Bowman documents and searches and confer team re depo prep.	0.9	
4/6/2021	GCG	Conf w/ JSY and emails to team re preparation for upcoming depositions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2021	BBK	Reviewing/approving supp production of BD Fountaingrove Family Council docs.	0.1	
4/6/2021	JSY	Meeting re Bowman depo prep and document review; emails re same; edit search terms re same.	1.5	
4/6/2021	AX	Meeting w/ JSY, EH, KES re Bowman deposition document review.	1.0	
4/6/2021	AX	Related correspondence re search terms.	1.3	
4/6/2021	EH	Conference with JSY, AX, and KES re document review and strategies for BKD deposition.	1.0	
4/6/2021	EH	Email correspondence with JSY, AX, and KES re potential search terms to categorize custodial documents for upcoming deposition.	0.3	
4/6/2021	EH	Conference with RB and KES re document review and categorization of search terms for upcoming BKD depo.	0.3	
4/6/2021	EH	Drafting declaration in support of motion for class cert for relative of resident at Brookdale Fountaingrove.	0.6	
4/6/2021	KES	Review and organize co-counsel hot docs emails in preparation for depositions.	0.5	
4/6/2021	KES	Zoom meetings and emails with team and with R. Bonner re search terms for Bowman emails and custodial docs in preparation for deposition; review documents and terms re same.	3.5	
4/6/2021	KES	Email court reporter re upcoming depositions.	0.2	
4/7/2021	GCG	Emails to GW re hot docs for depositions and preparation for hearing before Judge Gilliam.	0.1	
4/7/2021	BBK	Reviewing draft joint letter brief re 30(b)(6) deposition.	0.1	
4/7/2021	BBK	Reviewing AX update re M&C w/ Ds re pendant call data.	0.1	
4/7/2021	JSY	Multiple emails and calls re document review re Bowman depo prep; review search terms re same.	0.7	
4/7/2021	AX	Prepare for meet and confer call, including pre-call w/ MJ.	1.6	
4/7/2021	AX	Attend meet and confer call.	0.6	
4/7/2021	AX	Send email to team re meet and confer call.	0.4	
4/7/2021	AX	Email correspondence w/ team re Bowman document review projects.	0.3	
4/7/2021	AX	Call w/ JSY.	0.3	
4/7/2021	AX	Document review.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/7/2021	KES	Review Bowman emails and custodial documents in preparation for deposition and confer R. Bonner and team re review batch issues.	3.6	
4/8/2021	GCG	Prepare for, participate in, and summarize CMC with Judge Gilliam.	0.8	
4/8/2021	GCG	Confs w/ GW and MJ re same.	0.3	
4/8/2021	GCG	Conf w/ JSY and email to RBGG team re next steps.	0.2	
4/8/2021	GCG	Review and revise draft stipulation and proposed order extending class cert schedule.	0.2	
4/8/2021	GCG	Review and annotate Aetier deposition transcript.	2.5	
4/8/2021	GCG	Emails to KS and MJ re discovery hearing transcript.	0.2	
4/8/2021	GCG	Review hot docs from production.	0.2	
4/8/2021	BBK	Reviewing hot docs shared by co-counsel for deposition of corporate BD employees.	0.1	
4/8/2021	BBK	Conferring w/ JSY/AX/GCG re hearing on request for EOT to file class cert motion & next steps to prep for class cert.	0.2	
4/8/2021	JSY	Listen to CMC hearing; conf. w/ GCG re same; emails with team re same.	0.5	
4/8/2021	JSY	Emails re Bowman depo prep.	0.2	
4/8/2021	AX	Observe case management conference and related correspondence w/ team.	0.4	
4/8/2021	AX	Correspondence w/ team re review of hot documents from document review.	0.5	
4/8/2021	AX	Bowman document review.	1.5	
4/8/2021	KES	TC and follow up email to relative of Brookdale resident.	0.2	
4/8/2021	KES	Review docket and update pleadings file.	0.2	
4/8/2021	KES	Check calendaring issue.	0.1	
4/8/2021	KES	Confer team re LW doc review assistance re Bowman documents.	0.2	
4/8/2021	KES	Emails with team re upcoming depos.	0.2	
4/8/2021	KES	Email co-counsel with copies of depo transcripts to date.	0.2	
4/8/2021	KES	Review Bowman emails and custodial documents for depo prep.	3.7	
4/9/2021	GCG	Conf w/ JSY re preparation for Bowmen deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/9/2021	GCG	Review defendant's revisions to class cert stip and order; email to MJ re same.	0.2	
4/9/2021	GCG	Review and annotate Aetier deposition transcript; email BBK re same.	0.9	
4/9/2021	GCG	Meeting w/ Schneider Wallace to plan class cert motion.	0.8	
4/9/2021	GCG	Meeting w/ GW, MJ, DM and JT to plan expert declarations and discovery needed for same.	0.7	
4/9/2021	GCG	Draft ED deposition questions for expert declaration; emails BBK re same.	0.3	
4/9/2021	GCG	RBGG team meeting to discuss document review privilege log and plaintiff substitution motion.	0.8	
4/9/2021	GCG	Email to GW, MJ and GM re discovery brief.	0.1	
4/9/2021	BBK	Conferring w/ litigation team re stip for EOT to file class cert motion; reviewing comm'ns w/ opposing counsel re letter brief on 30(b)(6) depositions.	0.1	
4/9/2021	BBK	Reviewing AX-opposing counsel meet and Conference emails re production of pendant call data; conferring w/ team re same.	0.1	
4/9/2021	BBK	Meeting w/ co-counsel on class cert strategy/prep.	0.9	
4/9/2021	BBK	Analyzing docs in prep for Buot deposition.	3.0	
4/9/2021	BBK	Meeting w/ RBGG team re case strategy/tasks.	0.7	
4/9/2021	BBK	Conferring w/ GCG re questioning Buot re cross-training during deposition.	0.1	
4/9/2021	JSY	Meeting re Bowman depo prep.	0.6	
4/9/2021	JSY	Meeting re class cert preparations.	1.0	
4/9/2021	JSY	Team meeting.	0.5	
4/9/2021	AX	Meeting w/ JSY, LW, KES, EH re Bowman document review.	0.5	
4/9/2021	AX	Review correspondence from opposing counsel re stipulation and 30b6 depos.	0.1	
4/9/2021	AX	Strategy meeting with team re case issues.	0.9	
4/9/2021	AX	Draft email to opposing counsel re pendant issues and related correspondence w/ team.	0.3	
4/9/2021	AX	Correspondence w/ Silversphere counsel re pendant data.	0.1	
4/9/2021	AX	Review list of Brookdale discovery action items.	0.2	
4/9/2021	AX	Call counsel for Lifeline and related correspondence.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/9/2021	AX	Draft response to opposing counsel re pendant response data and related correspondence w/ team.	0.8	
4/9/2021	AX	Team correspondence of hot documents.	0.3	
4/9/2021	AX	Document review for Bowman declaration.	0.8	
4/9/2021	EH	Conference with team and co-counsel re motion for class cert.	1.0	
4/9/2021	EH	Conference with JSY, AX, KES, and LW re document review for Bowman deposition.	0.6	
4/9/2021	EH	Weekly conference with team re outstanding tasks for motion for class cert and discovery.	0.8	
4/9/2021	KES	Zoom meetings with co-counsel and internal team re document review and class cert.	2.5	
4/9/2021	KES	Email LW re review of Bowman documents.	0.1	
4/9/2021	KES	Review Bowman emails and custodial documents re ADA issues in preparation for deposition.	3.5	
4/9/2021	LHW	Teleconference call with Team regarding Relativity review protocol.	0.7	
4/9/2021	LHW	Document review in Relativity.	0.2	
4/10/2021	GCG	Review personnel assessment and related documents.	0.1	
4/10/2021	GCG	Emails to MJ. BBK and team re cross trained staff questions and revisions to AX email re pendant dispute.	0.2	
4/10/2021	GCG	Legal research for class cert motion.	0.1	
4/10/2021	BBK	Reviewing GCG annotations for Atien deposition transcript.	0.6	
4/10/2021	BBK	Analyzing Buot emails for deposition prep.	1.9	
4/10/2021	BBK	Conferring w/ KES/EH re conducting targeted searches in Buot emails.	0.1	
4/10/2021	BBK	Conferring w/ M. Johnson/GCG re hot docs and topics for depositions.	0.1	
4/11/2021	BBK	Reviewing comm'ns w/ opposing counsel re Stip for class cert EOT & joint letter brief on 30(b)(6) deposition.	0.1	
4/11/2021	AX	Legal research re privilege log and Upjohn issues, draft letter re privilege issues; correspondence w team re pendant issues.	1.0	
4/12/2021	GCG	Conf w/ and emails to BBK and AX re preparation for and follow up from ED depositions.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2021	BBK	Reviewing AX comm'ns w/ opposing counsel and third party pendant providers re obtaining docs in regard to discovery and subpoena.	0.1	
4/12/2021	BBK	Reviewing M. Johnson - G. Maatman comm'ns re finalizing joint discovery ltr brief on 30(b)(6) deposition.	0.1	
4/12/2021	BBK	Conferring by email w/ litigation team re potential former ED witnesses/declarants.	0.1	
4/12/2021	BBK	Conferring w/ KES re targeted searches w/n Buot email production and identifying Exhibits for deposition.	0.3	
4/12/2021	BBK	Preparing outline for Buot deposition.	2.3	
4/12/2021	BBK	Conferring w/ LW/JSY re hot docs on pendant call response time issues.	0.2	
4/12/2021	BBK	Conferring by phone w/ GCG/AX re depositions and class cert strategy.	0.4	
4/12/2021	BBK	Analyzing Buot email production.	4.7	
4/12/2021	JSY	Emails re doc review and Bowman depo prep.	0.2	
4/12/2021	AX	Email correspondence w/ opposing counsel re pendant discovery dispute.	0.2	
4/12/2021	AX	Review team correspondence regarding discovery disputes.	0.2	
4/12/2021	AX	Call w/ Lifeline counsel re third party subpoena.	0.6	
4/12/2021	AX	Review corresponding emails re Lifeline subpoena.	0.2	
4/12/2021	AX	Email correspondence re Silversphere subpoena.	0.2	
4/12/2021	AX	Call w/ GCG and BBK re case strategy issues.	0.4	
4/12/2021	AX	Team correspondence regarding email review for Buot and Bowman deposition.	0.2	
4/12/2021	AX	Research regarding privilege log issues.	1.5	
4/12/2021	AX	Draft letter regarding deficiencies in Brookdale privilege logs.	1.5	
4/12/2021	EH	Reviewed and analyzed DSS, LPA and internal complaint documents for memo to file re upcoming Bowman depo.	3.8	
4/12/2021	KES	Download and circulate order and calendar class cert deadlines.	0.2	
4/12/2021	KES	Emails LW re Bowman depo prep document review.	0.2	
4/12/2021	KES	Review remote depo link and forward to co-counsel.	0.1	
4/12/2021	KES	Create multiple sub-searches in Buot emails for various topics to aid review for depo prep; Conference R. Bonner re same.	2.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 387

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2021	KES	Review and gather additional documents for Buot depo prep.	0.9	
4/12/2021	KES	Upload marked depo exhibits to OneDrive for co-counsel.	0.9	
4/12/2021	LHW	Document review in Relativity.	4.8	
4/13/2021	GCG	Review and revise draft AX letter to defendant re improper privilege log.	0.3	
4/13/2021	GCG	Emails to GW and team re hot docs and preparation for ED and other depositions.	0.5	
4/13/2021	GCG	Conf w/ JSY re Bowman deposition.	0.2	
4/13/2021	BBK	Reviewing comm'ns w/ GCG-AX re Ds' inadequate privilege logs; reviewing G. Maatman - M. Johnson comm'ns re filing joint discovery letter brief on 30(b)(6) deposition.	0.1	
4/13/2021	BBK	Conferring w/ KES re exhibits for Buot deposition.	0.1	
4/13/2021	BBK	Conferring w/ litigation team re BD emails discussing lawsuit.	0.3	
4/13/2021	BBK	Analyzing Buot emails.	8.1	
4/13/2021	JSY	Emails re doc review and Bowman depo prep.	0.3	
4/13/2021	JSY	Conf. w/ GCG re depo prep.	0.2	
4/13/2021	AX	Revise privilege log letter and send to team.	0.5	
4/13/2021	AX	Review Brookdale joint letter re 30b6 depositions.	0.2	
4/13/2021	AX	Review team correspondence re staffing model.	0.1	
4/13/2021	AX	Team correspondence re Oliver piece on assisted living.	0.2	
4/13/2021	AX	Correspondence w/ team re: hot documents.	0.5	
4/13/2021	AX	Correspondence w/ team and review of clawback privilege log, related correspondence.	0.2	
4/13/2021	AX	Review of Bowman emails and related customization documents.	3.5	
4/13/2021	EH	Reviewed and analyzed DSS, LPA and internal complaint documents for memo to file re upcoming Bowman depo.	3.3	
4/13/2021	KES	Review documents from Brookdale resident and email team re follow up.	0.4	
4/13/2021	KES	Confirm Buot depo and update calendar entry.	0.2	
4/13/2021	KES	Download and circulate pleading.	0.1	
4/13/2021	KES	Emails with team re Relativity doc review.	0.2	
4/13/2021	KES	Continue review of Bowman documents in preparation for deposition.	5.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2021	LHW	Review documents in Relativity for Bowman deposition.	3.7	
4/14/2021	BBK	Conferring w/ KES re exhibits for Buot Deposition.	0.2	
4/14/2021	BBK	Analyzing Buot emails.	2.2	
4/14/2021	BBK	Set-up of remote deposition and Box exhibits program (including conferring w/ KH and contractors re same).	1.5	
4/14/2021	BBK	Conferring by phone w/ AX re Buot deposition.	0.4	
4/14/2021	BBK	Preparing for Buot deposition.	5.4	
4/14/2021	JSY	Emails re doc review and depo prep for Bowman.	0.2	
4/14/2021	JSY	Bowman depo prep and document review.	2.0	
4/14/2021	AX	Call w/ BBK re Buot deposition issues.	0.4	
4/14/2021	AX	Calls w/ KES re Bowman depo issues.	0.2	
4/14/2021	AX	Emails w/ BBK re ED depositions.	0.2	
4/14/2021	AX	Review correspondence from opposing counsel re pendant issues.	0.2	
4/14/2021	AX	Bowman document review and prepare for deposition.	1.7	
4/14/2021	KES	Email team re call with relative of Brookdale resident and voicemail to relative.	0.2	
4/14/2021	KES	Emails with R. Bonner re plaintiff production and gather documents from production for BBK use at Buot depo.	1.7	
4/14/2021	KES	Continue review of Bowman documents for depo prep.	4.0	
4/14/2021	LHW	Review documents in Relativity for Bowman deposition.	3.4	
4/15/2021	GCG	Review emails to GW and team re pendent and ADA data.	0.1	
4/15/2021	GCG	Conf w/ BBK re Bust deposition prep.	0.1	
4/15/2021	BBK	Reviewing AX update re pendant data; conferring w/ litigation team re same.	0.1	
4/15/2021	BBK	Drafting outline and preparing for Buot Deposition.	7.4	
4/15/2021	BBK	Reviewing/responding Ds' request to reschedule or shorten Buot deposition; conferring w/ team re same.	0.4	
4/15/2021	BBK	Creating exhibits for Buot deposition.	1.5	
4/15/2021	JSY	Document review; prep for Bowman depo; emails re same.	2.0	
4/15/2021	AX	Analysis of facilities pendant data and related correspondence.	1.5	
4/15/2021	AX	Email correspondence w/ Titan re pendant data.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/15/2021	AX	Draft email response to opposing counsel re M&C issue and related correspondence.	0.8	
4/15/2021	AX	Review Bowman deposition documents.	2.1	
4/15/2021	KES	Review and gather documents for BBK for Buot depo prep.	0.9	
4/15/2021	KES	TC to relative of Brookdale resident.	0.1	
4/15/2021	KES	Emails to court reporter and team re Buot depo start time change.	0.5	
4/15/2021	KES	Continue review of Bowman emails and custodial docs re ADA issues in preparation for deposition.	4.5	
4/15/2021	LHW	Review documents in Relativity for Bowman deposition.	5.1	
4/16/2021	GCG	Emails to BBK and team re upshot of Buot deposition.	0.1	
4/16/2021	BBK	Preparing for Buot deposition.	0.7	
4/16/2021	BBK	Taking Buot deposition (including planning during breaks).	7.5	
4/16/2021	BBK	Conferring w/ court reporter post-deposition regarding transcript and depo notice.	0.2	
4/16/2021	BBK	Reviewing comm'ns w/ litigation team re pendant data.	0.1	
4/16/2021	BBK	Conferring w/ JSY and AX re Buot deposition.	0.2	
4/16/2021	BBK	Drafting/sending summary of Buot Deposition to litigation team.	0.5	
4/16/2021	BBK	Updating exhibit spreadsheet w/ exhibits introduced at Buot Deposition.	0.1	
4/16/2021	JSY	Meeting with team re class cert.	1.3	
4/16/2021	JSY	Document review re Bowman depo; emails re same.	3.9	
4/16/2021	AX	Attend part of strategy meeting w/ team re class certification case tasks.	1.0	
4/16/2021	AX	Email correspondence w/ Silversphere counsel.	0.2	
4/16/2021	AX	Email correspondence w/ Brookdale counsel re pendant responses.	0.3	
4/16/2021	AX	Call w/ TC re privilege log issues.	0.2	
4/16/2021	AX	Review supplemental privilege log.	0.8	
4/16/2021	AX	Review Bowman documents.	1.8	
4/16/2021	EH	Call with team and co-counsel re motion for class cert.	1.2	
4/16/2021	KES	Zoom meeting with co-counsel re class cert.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/16/2021	KES	Confirm deposition.	0.1	
4/16/2021	KES	Continue review of Bowman emails and custodial documents re ADA issues in preparation for deposition.	3.5	
4/16/2021	LHW	Review documents in Relativity for Bowman deposition.	5.7	
4/17/2021	JSY	Bowman document review.	1.0	
4/18/2021	GCG	Review emails to JSY, GW, MJ and team re hot docs for depositions.	0.1	
4/18/2021	GCG	Review emails to GM and MJ re organization charts and job descriptions.	0.1	
4/18/2021	JSY	Emails re Bowman document review.	0.1	
4/18/2021	EH	Reviewed and analyzed DSS, LPA and internal complaint documents for memo to file re upcoming Bowman depo.	2.6	
4/19/2021	GCG	Conf w/ JSY re preparation for Bowman deposition.	0.1	
4/19/2021	BBK	Conferring w/ litigation team re master list of deposition exhibits.	0.1	
4/19/2021	BBK	Conferring w/ JSY re confidentiality designations of deposition transcripts and exhibits.	0.1	
4/19/2021	JSY	Bowman depo prep; document review re same; emails re same.	5.5	
4/19/2021	AX	Bowman document review and draft memo regarding deposition documents.	4.5	
4/19/2021	EH	Review and analysis of DSS, LPA and internal complaint documents for upcoming Bowman depo.	4.9	
4/19/2021	KES	Download and circulate discovery order and calendar deadlines.	0.2	
4/19/2021	KES	Complete review and summary of Bowman emails and custodial documents relating to ADA issues, including accommodations, transportation and evacuation in preparation for Bowman depo.	7.3	
4/19/2021	LHW	Finalize memo for Bowman deposition regarding CMIP.	2.2	
4/20/2021	GCG	Emails to GW and team re document review and preparation for deposition.	0.1	
4/20/2021	BBK	Reviewing comm'ns w/ litigation team re priorities/planning for Bowman deposition.	0.1	
4/20/2021	JSY	Bowman depo prep; review documents re same; email and conf. re same.	5.1	
4/20/2021	AX	Review team correspondence regarding upcoming Brookdale depositions.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 391

SERVICES

Date	Person	Description of Services	Hours	Discount
4/20/2021	AX	Call with JY regarding strategy for Bowman deposition.	0.4	
4/20/2021	AX	Document review and draft memo regarding Bowman declaration and variance documents.	3.8	
4/20/2021	EH	Finalized memo to file on review and analysis of DSS, LPA and internal complaint documents for upcoming Bowman depo.	3.2	
4/20/2021	KES	Emails with team and court reporter regarding logistics for upcoming depositions.	0.9	
4/20/2021	KES	Excerpt language from Brookdale 10K and gather relevant 10Ks and circulate to team.	0.7	
4/21/2021	GCG	Conf w/ AX re privileged log letter, substitution issues and preparation for Bowman.	0.5	
4/21/2021	GCG	Conf w/ JSY and email team re ongoing class cert depositions.	0.1	
4/21/2021	JSY	Observe RD deposition as prep for KB depo; draft notes re same.	3.0	
4/21/2021	JSY	Draft KB depo outline; review documents re same; emails and calls re same.	4.1	
4/21/2021	AX	Call w/ JSY re Bowman deposition.	0.3	
4/21/2021	AX	Call w/ GCG re case tasks and update successor in interest issues.	0.6	
4/21/2021	AX	Review memos regarding Bowman deposition.	0.3	
4/21/2021	AX	Research former Eds and related document review.	1.5	
4/21/2021	AX	Correspondence w/ team re Dolcater deposition.	0.2	
4/21/2021	KES	Review, gather and summarize Bowman custodial documents relating to PSA and PSR in preparation for depo.	8.0	
4/21/2021	KES	Download and review response to Stanley records subpoena.	0.2	
4/22/2021	GCG	Prepare for and attend hearing before MJ Beeler re 30(b)(6) deposition.	0.6	
4/22/2021	GCG	Confs w/ and emails to GW and MJ re same and next steps.	0.6	
4/22/2021	GCG	Conf w/ JSY and email to AX re discovery issues and class cert motion.	0.2	
4/22/2021	BBK	Conferring w/ JSY re prep for Bowman Deposition.	0.1	
4/22/2021	BBK	Reviewing GCG update re hearing on MTC 30(b)(6) deposition and discovery order.	0.1	
4/22/2021	BBK	Conferring w/ RBGG team re deposition prep and potential class cert declarants.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/22/2021	JSY	Draft KB depo outline; review documents re same; emails and calls re same.	5.8	
4/22/2021	AX	Review Brookdale privilege log and draft letter re same.	3.5	
4/22/2021	AX	Email correspondence w/ team re document review for Bowman deposition.	0.5	
4/22/2021	AX	Update to-do list.	0.5	
4/22/2021	AX	Draft memo regarding former Eds and Brookdale employees.	0.5	
4/22/2021	AX	Review court order.	0.1	
4/22/2021	AX	Email correspondence re CAPs and Bowman deposition.	0.1	
4/22/2021	AX	Email correspondence w/ team re substitution of plaintiffs.	0.4	
4/22/2021	KES	Emails with team and court reporter re postponed deposition.	0.3	
4/22/2021	KES	Download and circulate discovery order.	0.1	
4/22/2021	LHW	Document review in Relativity.	2.4	
4/23/2021	GCG	Prepare for and conduct meeting w/ Schneider Wallace re class cert issues and motions to compel.	0.7	
4/23/2021	GCG	Emails to JSY and team re missing Bowman emails and plan for other deponents.	0.2	
4/23/2021	GCG	Email to AX and team re privilege log letter.	0.1	
4/23/2021	BBK	Reviewing T. Close list of categories of outstanding docs to demand production.	0.1	
4/23/2021	BBK	Conferring w/ RBGG team re meeting w/ co-counsel and discovery plan.	0.2	
4/23/2021	BBK	Reviewing M&C emails w/ opposing counsel re outstanding requests for docs.	0.1	
4/23/2021	BBK	Meeting w/ co-counsel re depositions & compelling production of discovery.	0.6	
4/23/2021	BBK	Comm'ns w/ litigation team regarding Ds' omission of Bowman e-mails from doc production & FU w/ opposing counsel re need for complete production prior to depo.	0.1	
4/23/2021	BBK	Reviewing AX M&C ltr to Ds re privilege log.	0.1	
4/23/2021	BBK	Reviewing AX proposed plan for substitution of parties.	0.1	
4/23/2021	JSY	Prep for Bowman depo; team meeting re same; multiple emails and calls re postponement of depo and issue with email production.	6.3	
4/23/2021	AX	Email correspondence w/ team re meeting times.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/23/2021	AX	Strategy meeting w/ team regarding class cert issues.	0.8	
4/23/2021	AX	Strategy meeting w/ team regarding motions to compel.	0.8	
4/23/2021	AX	Team correspondence regarding Bowman deposition emails and prep.	0.8	
4/23/2021	AX	Research and draft memo regarding plaintiff substitution issue.	1.2	
4/23/2021	AX	Review and send letter to opposing counsel re privilege log deficiency.	1.8	
4/23/2021	KES	Zoom doc review meeting with co-counsel.	0.7	
4/23/2021	KES	Emails to team re documents discussed in doc review meeting.	0.3	
4/23/2021	KES	Review emails re Bowman emails and check Relativity re same.	0.4	
4/24/2021	GCG	Research re impact of substitution motion.	0.7	
4/24/2021	GCG	Emails to AX and team re same and re next steps.	0.2	
4/25/2021	GCG	Review and analyze hot docs highlighted by GW and regulatory references for use in motion for class cert.	1.2	
4/25/2021	GCG	Emails to Aw re substitution issues and further legal research.	0.2	
4/25/2021	SJR	Emails re class representatives.	0.3	
4/25/2021	AX	Legal research and draft memo re plaintiff substitution issues.	3.8	
4/26/2021	GCG	Conf w/ AX re issues to research re substitution motion.	0.3	
4/26/2021	GCG	Emails to GW and MJ re lack of Bowman emails.	0.1	
4/26/2021	BBK	Reviewing AX memo re substitution of parties.	0.1	
4/26/2021	BBK	Reviewing Ds' supp resp to Carlson Rogs.	0.1	
4/26/2021	JSY	Emails re Bowman deposition and documents.	0.2	
4/26/2021	AX	Phone call w/ GCG re substitution and complaint amendment issues.	0.4	
4/26/2021	AX	Research issues re: survival of UCL and CA statutory claims.	1.0	
4/26/2021	AX	Research issues re: amended complaint and Rule 15.	1.3	
4/26/2021	AX	Draft research memo and email to co-counsel re findings.	1.5	
4/26/2021	AX	Review emails re various case issues.	0.3	
4/26/2021	KES	Emails with team and court reporter re postponed Bowman depo.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2021	KES	Update electronic hot docs folder.	0.2	
4/26/2021	KES	Download subpoenaed records from 3rd party.	0.1	
4/27/2021	GCG	Review and analysis of substitution cases.	0.4	
4/27/2021	GCG	Conf w/ AX and email to GW, KS and team re plan and approach.	0.2	
4/27/2021	BBK	Reviewing GCG report to co-counsel re plan for substitution of parties.	0.1	
4/27/2021	JSY	Emails re substitution motion.	0.1	
4/27/2021	AX	Research re: substitution issue and amended complaint and related email correspondence.	1.2	
4/27/2021	AX	Conversation w/ GCG re same.	0.2	
4/27/2021	KES	Confirm Toomer depo with court reporter and team.	0.2	
4/27/2021	KES	Update electronic files with subpoenaed records.	0.2	
4/28/2021	GCG	Revise draft letter to plaintiffs re substitution.	0.4	
4/28/2021	GCG	Revise draft email to GM re same.	0.2	
4/28/2021	GCG	Email to GW and KS re call to discuss.	0.1	
4/28/2021	GCG	Conf w/ JSY re discovery, motions to compel and substitution.	0.2	
4/28/2021	BBK	Reviewing AX draft letter to clients and email to opposing counsel re substitution of parties.	0.1	
4/28/2021	AX	Draft letter to successors-in-interest.	1.0	
4/28/2021	AX	Draft email to opposing counsel.	0.4	
4/28/2021	AX	Review correspondence with team and opposing counsel re case issues.	0.3	
4/29/2021	GCG	Conf w/ KS, TC, MJ, GW, RS and AX re substitution plan.	0.5	
4/29/2021	GCG	Conf w/ and emails to AX re next steps.	0.1	
4/29/2021	GCG	Review MJ and GM emails re Rule 30(b)(6) and other discovery disputes.	0.1	
4/29/2021	BBK	Conferring w/ AX re client call w/ JCarlson.	0.1	
4/29/2021	BBK	Conferring by phone w/ AX and J Carlson.	0.3	
4/29/2021	BBK	Reviewing MJ-GMaatman emails re Ds refusal to produce responsive docs.	0.1	
4/29/2021	JSY	Emails re substitution issue.	0.1	
4/29/2021	AX	Call w/ GCG, KS, MJ, GW re case issues.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/29/2021	AX	Call w/ GCG re case issues.	0.1	
4/29/2021	AX	Email correspondence w/ team re: substitution issues and contacting plaintiffs.	0.3	
4/29/2021	AX	Call w/ BBK and Joanie Carlson re substitution issue.	0.3	
4/29/2021	AX	Call w/ ML re substitution issue.	0.2	
4/29/2021	AX	Call LV re substitution issue.	0.1	
4/29/2021	AX	Draft memo re calls w/ pls.	0.3	
4/29/2021	AX	Revise letters to pls and related emails.	0.5	
4/30/2021	GCG	Meet w/ Schneider Wallace to discuss class cert motion and discovery issues.	0.7	
4/30/2021	GCG	Revise letters to clients re substitution motion.	0.3	
4/30/2021	GCG	Revise letter to GM re same.	0.3	
4/30/2021	GCG	Conf w/ and emails to AX re exhibits to letter and communications w/ clients and substitution motion.	0.4	
4/30/2021	GCG	Initial review of defendant's motion to deny class cert.	0.1	
4/30/2021	GCG	Communications w/ JSY re same.	0.1	
4/30/2021	BBK	Meeting w/ co-counsel re class cert strategy and tasks.	0.6	
4/30/2021	BBK	Meeting w/ RBGG team re class cert strategy and tasks.	0.2	
4/30/2021	BBK	Conferring w/ KES re Buot Deposition Transcript.	0.1	
4/30/2021	BBK	Reviewing draft letter to opposing counsel re substitution of plaintiffs.	0.1	
4/30/2021	BBK	Reviewing JSY draft joint letter brief re Ds' omission of ESI from April 2020 on.	0.1	
4/30/2021	BBK	Reviewing/commenting on T. Close draft omnibus discovery action letter.	0.4	
4/30/2021	BBK	Conferring w/ JSY and AX re Ds' motion to deny class cert.	0.2	
4/30/2021	JSY	Team meeting re class cert plan.	0.5	
4/30/2021	JSY	Draft letter brief re post April 2020 emails; edit same and send to GM.	1.5	
4/30/2021	JSY	Multiple calls and emails re Def's Mtn to Deny Class Cert.	0.5	
4/30/2021	AX	Draft letter to opposing counsel re substitution of pls.	0.8	
4/30/2021	AX	Email correspondence w/ RB re pls' documents and review of same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/30/2021	AX	Strategy meeting with team re document review, PMK depositions, and case strategy issues.	1.0	
4/30/2021	AX	Call and correspondence w/ LV.	0.3	
4/30/2021	AX	Call w/ GCG re case issues.	0.2	
4/30/2021	AX	Revise letters to Pls and to opposing counsel.	0.5	
4/30/2021	AX	Send letters to pls.	0.2	
4/30/2021	AX	Legal research and draft motion for substitution.	1.2	
4/30/2021	AX	Review motion to oppose class certification and related correspondence w/ team.	1.2	
4/30/2021	EH	Revised letters to named plaintiffs' re successor-in-interest stipulation.	0.5	
4/30/2021	FGL	(Billing Judgment) Email from/to AX re draft letters to LV, ML, and JC re substitution and format/finalize same (.3); email from/to GCG re revisions to same and revise/format same (.2).	0.0	0.5
4/30/2021	KES	Zoom meeting with co-counsel re document review and class cert issues.	1.2	
4/30/2021	KES	Prepare exhibits for substitution letter.	0.8	
4/30/2021	KES	Download and circulate Buot depo transcript.	0.3	
4/30/2021	KES	Download and circulate Defs motion to deny class certification.	0.5	
5/1/2021	GCG	Review and analyze defendant's motion to deny class cert.	0.4	
5/1/2021	GCG	Emails to GW and team re our opposition and interplay w/ substitution motion.	0.2	
5/1/2021	GCG	Email to ML and BL re substitution.	0.2	
5/1/2021	JSY	Emails re Opp to Defs' motion to deny class certification.	0.1	
5/2/2021	GCG	Emails to GW, AX and team re opposition to motion to deny class certification and motion to substitute plaintiffs.	0.2	
5/2/2021	GCG	Email to MJ and team re Brookdale's systems and documents.	0.1	
5/2/2021	JSY	Emails with team re Defs' motion to deny class certification.	0.1	
5/2/2021	AX	Review correspondence from team re motion to deny class certification strategy issues.	0.2	
5/3/2021	GCG	Emails to AX and team re motions to substitute and denying class certification.	0.1	
5/3/2021	GCG	Email to MJ and team re response to GM meet and confer.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 397

SERVICES

Date	Person	Description of Services	Hours	Discount
5/3/2021	GCG	Review court's order denying motion to deny class cert.	0.1	
5/3/2021	BBK	Reviewing G. Maatman response to draft discovery letter brief and report re supp production of omitted docs and M. Johnson's response thereto.	0.1	
5/3/2021	BBK	Conferring w/ RBGG team re FRCP 25 motion for substitution of parties.	0.1	
5/3/2021	BBK	Reviewing Ds' Motion to Deny Class Cert.	0.3	
5/3/2021	BBK	Reviewing Court's Minute Order denying Ds' Motion to Deny Class Cert; conferring w/ team re same.	0.1	
5/3/2021	JSY	Emails re denial of Def's motion to deny class cert.	0.1	
5/3/2021	AX	Email correspondence re Friday strategy meeting.	0.1	
5/3/2021	AX	Draft motion to substitute.	3.2	
5/3/2021	KES	Confer AX re hosting Friday Zoom with co-counsel and send email re same.	0.3	
5/3/2021	KES	Calendar deadlines re opp to defs motion.	0.2	
5/4/2021	GCG	Confs w/ JSY, KES and AX re declaration gathering and motion for class cert.	0.5	
5/4/2021	GCG	Review substitution case.	0.2	
5/4/2021	GCG	Conf w/ AX re same.	0.2	
5/4/2021	GCG	Revise letter to GM re same.	0.1	
5/4/2021	GCG	Review GM, MJ and JSY communications re discovery disputes.	0.2	
5/4/2021	GCG	Review MJ Beeler discovery order.	0.1	
5/4/2021	GCG	Zoom meeting w/ BU and SW to plan class cert motion and declaration review.	1.0	
5/4/2021	BBK	Reviewing LB Order re discovery brief & conferring w/ litigation team re same.	0.1	
5/4/2021	BBK	Reviewing M&C emails by M. Johnson and JSY re 30(b)(6) deponents, omitted ESI from April 2020 on, and omitted responsive docs to RFPs 1-4.	0.1	
5/4/2021	BBK	Preparing for co-counsel meeting re class cert prep.	0.1	
5/4/2021	BBK	Co-counsel meeting re class cert prep.	1.1	
5/4/2021	JSY	Team meeting re class cert prep; emails re document production issue.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/4/2021	AX	Team strategy meeting re meet and confer efforts, substitution motion, 30b6 depositions and conversation with GCG re same.	1.3	
5/4/2021	AX	Research re amending complaint post substitution motion.	0.6	
5/4/2021	AX	Review of and correspondence re redactions to Maatman letter exhibits.	0.3	
5/4/2021	AX	Draft motion for substitution.	2.5	
5/4/2021	EH	Conference with team re motion for class certification and outstanding tasks.	1.1	
5/4/2021	KES	Download and circulate discovery letter brief.	0.1	
5/4/2021	KES	Redact and prepare exhibits for substitution letter.	1.3	
5/4/2021	KES	Reschedule Garner depo.	0.2	
5/5/2021	GCG	Conf w/ and email to GW re arbitration clauses and effect on public injunctions.	0.2	
5/5/2021	GCG	Review CDH memo re same and Blair case.	0.3	
5/5/2021	GCG	Conf w/ BBK re interviewing former EDs.	0.1	
5/5/2021	GCG	Email to AX re substitution brief.	0.1	
5/5/2021	BBK	Conferring w/ GCG re identifying former BD employees as potential witnesses.	0.1	
5/5/2021	BBK	Reviewing MJ meet and confer letter re additional discovery deficiencies.	0.1	
5/5/2021	AX	Legal research and drafting motion for substitution.	3.8	
5/5/2021	AX	Review team correspondence re discovery issues.	0.2	
5/6/2021	GCG	Email from GW re invoice discovery.	0.1	
5/6/2021	GCG	Email to MJ and GM re meet and confer; email AX re substitution brief.	0.1	
5/6/2021	GCG	Review and revise draft substitution motion.	0.2	
5/6/2021	BBK	Reviewing AX draft FRCP 25 motion for substitution of parties.	0.2	
5/6/2021	BBK	Conferring w/ team re video of Buot Depo.	0.1	
5/6/2021	BBK	Emailing w/ B. Umpierre re identifying former BD employee witnesses.	0.1	
5/6/2021	KES	Download Buot transcript and upload to TextMap; email team re same.	0.4	
5/7/2021	EG	Conf with GCG re Brookdale financial situation.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/7/2021	GCG	Conf w/ Schneider Wallace and RBGG teams re class cert, motion discovery disputes and document review for upcoming depositions.	1.0	
5/7/2021	GCG	Research and revise draft letter to GM re substitution.	0.5	
5/7/2021	GCG	Research and revise draft motion for substitution and related pleadings.	2.0	
5/7/2021	GCG	Confs w/ and emails to AX re same and re service on family members.	0.5	
5/7/2021	GCG	Review class member retainer agreements.	0.3	
5/7/2021	GCG	Conf w/ KES re same.	0.2	
5/7/2021	GCG	Research and draft sealing motion.	0.4	
5/7/2021	SJR	Emails re co-counsel.	0.4	
5/7/2021	BBK	Conferring w/ GCG re motion of substitution.	0.1	
5/7/2021	BBK	Meeting w/ co-counsel re class cert and case strategy.	0.6	
5/7/2021	BBK	Meeting w/ RBGG team re class cert and case strategy.	0.4	
5/7/2021	BBK	Conferring w/ phone w/ B. Umpierre re retaining investigators to identify former BD employee witnesses.	0.3	
5/7/2021	BBK	Conferring w/ KES re list of former BD employees for outreach.	0.1	
5/7/2021	BBK	Conferring w/ MJ re list of former BD employees for outreach.	0.1	
5/7/2021	BBK	Reviewing MJ-GMaatman M&C emails re Ds' continuing refusal to comply w/ FRCP.	0.1	
5/7/2021	JSY	Team meeting re class cert and document review; emails re same.	1.1	
5/7/2021	AX	Research re motion to seal.	1.5	
5/7/2021	AX	Correspondence w/ GCG and KES re substitution motion and related issues.	0.5	
5/7/2021	KES	Prepare for and participate in Zoom meetings with co-counsel re doc review and depo prep.	1.7	
5/7/2021	KES	Review files and documents re information for outreach to potential declarants.	0.5	
5/7/2021	KES	Follow up email to doc review team re ADA PMK depo.	0.2	
5/7/2021	KES	Review electronic retainer agreements and check completeness; confer GCG re same.	1.1	
5/8/2021	GCG	Research and revise MPAs ISO motion to substitute.	2.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 400

SERVICES

Date	Person	Description of Services	Hours	Discount
5/8/2021	GCG	Emails to GW, KS, AX and KES re further legal research and client issues.	0.5	
5/9/2021	GCG	Email to JSY re named plaintiff allegations and class cert.	0.1	
5/9/2021	JSY	Emails re successor in interest issue.	0.1	
5/9/2021	AX	Email correspondence w/ team re motion to substitution and related research and issues.	0.6	
5/10/2021	GCG	Research and revise pleadings ISO motion to substitute and seal.	2.0	
5/10/2021	GCG	Revise and send letter to GM re same.	0.3	
5/10/2021	GCG	Conf w/ and emails to AX and KES re revisions to pleadings.	0.4	
5/10/2021	GCG	Conf w/ JC and RC re retainer agreement.	0.4	
5/10/2021	GCG	Revise and send retainer agreement to RC.	0.4	
5/10/2021	GCG	Team meeting to discuss Rule 30(b) document searches.	0.7	
5/10/2021	GCG	Emails to JSY and BBK re PMK designations.	0.1	
5/10/2021	BBK	Reviewing GCG-AX emails re FRCP 25 motion for substitution of parties.	0.1	
5/10/2021	BBK	Reviewing G. Maatman letter IRT AX letter re deficiencies in Ds' privilege logs.	0.1	
5/10/2021	BBK	Conferring w/ B Umpierre re investigators calling former BD employees.	0.1	
5/10/2021	BBK	Analyzing materials in prep for meeting re 30(b)(6) depositions.	0.7	
5/10/2021	BBK	RBGG team meeting re 30(b)(6) deposition prep.	1.0	
5/10/2021	BBK	Emailing w/ RBGG team re keywords for targeted searches for 30(b)(6) deposition topics.	0.1	
5/10/2021	BBK	Reviewing G. Maatman list of dates for 30(b)(6) depositions by topic and conferring w/ RBGG team re same.	0.2	
5/10/2021	JSY	Meeting with team re document review and prep for 30b6 depositions; draft search terms list re same.	1.9	
5/10/2021	AX	Meeting with attorneys re 30b6 deposition document review keywords and related case tasks.	0.6	
5/10/2021	AX	Follow up with team re CA statutes in deposition notice.	0.2	
5/10/2021	AX	Review GCG revisions to substitution motion and related correspondence.	1.1	
5/10/2021	AX	Legal research and related issues re sealing justification for trust documents.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/10/2021	AX	Revise substitution motion.	1.5	
5/10/2021	EH	Conference with team re search terms for 306B depositions.	0.6	
5/10/2021	FGL	(Billing Judgment) Email from/to GCG re R. Carlson retainer agreement and revise/format same.	0.0	0.2
5/10/2021	KES	Review retainer agreement exhibits and prepare for Carlson retainer; research updated rule 1.7 for same.	1.1	
5/10/2021	KES	Review def budget document and develop additional search terms for Topic 11 doc review.	1.7	
5/10/2021	KES	Review draft substitution letter and prepare exhibits for same.	1.2	
5/10/2021	KES	Prepare documents for revised production as confidential and confer R. Bonner and AX re same.	0.6	
5/10/2021	KES	Review and revise draft Grunfeld declaration.	0.3	
5/11/2021	GCG	Review and revise draft sealing motion.	0.9	
5/11/2021	GCG	Conf w/ and emails to AX re same and re cite-checking MPAs ISO substitution.	0.2	
5/11/2021	GCG	Email to AX and KES re service on family members.	0.1	
5/11/2021	GCG	Conf w/ RC and JC re RC retainer agreement.	0.5	
5/11/2021	GCG	Email JSY re same.	0.1	
5/11/2021	GCG	Emails to JSY, AX and BBK re meet and confer w/ defendants and planning for PMK depositions.	0.1	
5/11/2021	GCG	Review MJ and GM email re status of discovery disputes.	0.1	
5/11/2021	BBK	Conferring w/ JSY/KES/EH re keywords for targeted searches for 30(b)(6) depo topics.	0.1	
5/11/2021	BBK	Reviewing MJ-G Maatman emails re 30(b)(6) deposition topics.	0.1	
5/11/2021	BBK	Conferring w/ JSY and AX re 30(b)(6) depositions.	0.2	
5/11/2021	BBK	Meeting w/ RBGG team and co-counsel re 30(b)(6) depositions.	0.4	
5/11/2021	BBK	Conferring w/ RBGG team re plan for 30(b)(6) depositions.	0.1	
5/11/2021	BBK	Conferring w/ AX and JSY re meet and confer over 30(b)(6) depositions and disputes over doc productions.	0.1	
5/11/2021	BBK	Reviewing AX recap of meet and confer over 30(b)(6) depositions and outstanding discovery disputes.	0.1	
5/11/2021	BBK	Reviewing AX-GCG comm'ns re serving FRCP 25 substitution motion on 3d parties.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/11/2021	JSY	Emails and conf. re meet and confer with Brookdale.	0.3	
5/11/2021	JSY	Emails re search terms and document review.	0.3	
5/11/2021	AX	Precall w/ MJ and team re meet and confer call.	0.5	
5/11/2021	AX	Meet and confer call with Brookdale and cocounsel.	1.0	
5/11/2021	AX	Follow up call with MJ, GW, TC re meet and confer issues.	0.7	
5/11/2021	AX	Draft summary email to team re: meet and confer issues and related follow up.	0.6	
5/11/2021	AX	Research and correspondence w/ team re motion to substitute and related notice and signed acknowledgment issues.	0.5	
5/11/2021	AX	Team meeting re 30b6 deposition schedules and assignments (.4).	0.4	
5/11/2021	AX	Revise sealing MPAs and related correspondence.	0.5	
5/11/2021	AX	Revise and cite check MPAs for substitution motion, including legal research, and related correspondence.	3.7	
5/11/2021	EH	Revised search terms for budgetary items relating to 306B deposition.	0.4	
5/11/2021	FGL	(Billing Judgment) Email from/to GCG re retainer agreement to R. Carlson (.1); revise/format same (.1).	0.0	0.2
5/11/2021	KES	Review meet and confer summary and calendar PMK depo dates.	0.8	
5/11/2021	KES	Review additional Bowman docs in Relativity for SA issues for depo.	1.5	
5/11/2021	LHW	Document review in Relativity.	0.8	
5/12/2021	GCG	Continued research and revision of motions to substitute and seal.	1.8	
5/12/2021	GCG	Confs w/ AX and emails to AX, KES and team re revisions, cite-checking and exhibits to Grunfeld to redact.	0.5	
5/12/2021	GCG	Review and revise letter to Carlsons enclosing retention agreement.	0.2	
5/12/2021	GCG	(Billing Judgment) Sign retention agreement.	0.0	0.1
5/12/2021	BBK	Reviewing MJ-G.Maatman emails post-M&C re joint discovery letter briefs.	0.1	
5/12/2021	BBK	Reviewing GCG-AX comm'ns re FRCP 25 substitution motion.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/12/2021	BBK	Analyzing DSS deficiency citations and complaint reports for BD CA facilities during class period and creating exhibits to BBK class cert decl re same.	4.9	
5/12/2021	BBK	Emailing co-counsel re analysis of DSS deficiency citations and complaints.	0.1	
5/12/2021	AX	Correspondence w/ team re contact info for heirs.	0.2	
5/12/2021	AX	Correspondence and calls with GCG re revisions to substitution brief.	0.3	
5/12/2021	AX	Revise substitution brief.	1.7	
5/12/2021	AX	Email correspondence w/ team re interrogatory responses.	0.2	
5/12/2021	AX	Revise Grunfeld declaration iso motion to seal.	0.4	
5/12/2021	AX	Revise and draft admin motion to seal, including related research.	2.2	
5/12/2021	FGL	(Billing Judgment) Email from/to GCG re declaration to be filed under seal and revise/format same.	0.0	0.1
5/12/2021	KES	Prepare exhibits and redacted versions for substitution motion; review and revise Grunfeld decl.	4.3	
5/12/2021	KES	Continue doc review for bowman depo prep.	3.3	
5/13/2021	GCG	Review and revise pleadings ISO sealing and substitution.	0.5	
5/13/2021	GCG	Confs w/ and emails to AX and KES re same and trust documents.	0.3	
5/13/2021	GCG	Revise notice and acknowledgment to send to family members.	0.1	
5/13/2021	BBK	Reviewing/revising keywords for targeted searches for 30b6 depo prep.	0.4	
5/13/2021	BBK	Conferring w/ RBGG litigation team re keywords for targeted searches for 30b6 depo prep.	0.1	
5/13/2021	AX	Review search terms for 30b6 topics.	0.7	
5/13/2021	AX	Revise substitution motion and add citations to Grunfeld declaration.	1.5	
5/13/2021	AX	Draft proposed order for substitution motion.	0.7	
5/13/2021	AX	Draft and revise substitution motion documents, including Ralph Carlson declaration, proposed order for motion to seal, proposed order for motion for substitution, admin motion to seal.	1.5	
5/13/2021	AX	Review redactions to attachments to motion for substitution and related correspondence.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/13/2021	KES	Confer team re search parameters for 30b6 depo topics 10 and 11; run test searches re topic 11 terms and email R. Bonner re same; brief review of results re same.	2.9	
5/13/2021	KES	Review forms and draft notice and acknowledgment forms for substitution motion service.	1.3	
5/13/2021	KES	Email JY re review of docs for Bowman depo.	0.2	
5/13/2021	KES	Prepare additional exhibit for motion.	0.2	
5/13/2021	KES	Continue doc review for depo prep.	2.2	
5/14/2021	GCG	Participate in team meeting w/ SW re discovery disputes and 30(b)(6) deposition preparation.	0.7	
5/14/2021	GCG	Follow up meeting w/ RBGG team re same and declarations ISO class cert.	0.3	
5/14/2021	GCG	Review and revise substitution and sealing pleadings.	1.5	
5/14/2021	GCG	Confs w/ and emails to JSY and KES re same.	0.5	
5/14/2021	GCG	Send sealing and substitution pleadings to co-counsel for review.	0.2	
5/14/2021	BBK	Reviewing MJ meet and confer emails to Ds re outstanding documents.	0.1	
5/14/2021	BBK	Reviewing MJ-G Maatman comm'ns re setting 30(b)(6) deposition dates and times.	0.1	
5/14/2021	BBK	Meeting w/ co-counsel re class cert prep.	0.4	
5/14/2021	BBK	Meeting w/ RBGG litigation team re class cert prep.	0.4	
5/14/2021	BBK	Conferring w/ team re draft joint letter brief sections.	0.1	
5/14/2021	JSY	Emails and calls re issue with Carlson trust documents for substitution motion; research re same.	0.5	
5/14/2021	JSY	Team meetings re class cert and document review tasks.	0.9	
5/14/2021	KES	Reschedule Garner depo and email team re same.	0.3	
5/14/2021	KES	Zoom team doc review meeting.	1.0	
5/14/2021	KES	Review initial Topic 11 search term hits, conduct test searches and suggest revised search terms to team.	1.5	
5/14/2021	KES	Prepare and redact exhibits for substitution motion.	2.8	
5/14/2021	KES	Conduct additional review and download of documents in preparation for Bowman depo.	2.2	
5/15/2021	GCG	Email to GW re GM allegations.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2021	GCG	Conf w/ and email BBK outreach to former EDs for declarations.	0.5	
5/17/2021	GCG	Review defendants' response to AX letter re privilege log and email AX re same.	0.3	
5/17/2021	GCG	Review MJ email re approach to meet and confer.	0.1	
5/17/2021	GCG	Further revisions to motions to seal and substitute.	1.3	
5/17/2021	GCG	Confs w/ and emails to AX and KES re same.	0.6	
5/17/2021	GCG	Oversee e-filing and service.	0.2	
5/17/2021	BBK	Revising B. Umpierre draft script for investigators.	0.2	
5/17/2021	BBK	Analyzing data re former BD Executive Directors.	2.8	
5/17/2021	BBK	Drafting proposal to GCG re outreach to former BD EDs.	0.4	
5/17/2021	BBK	Conferring by phone w/ GCG re former BD EDs.	0.1	
5/17/2021	BBK	Drafting report to co-counsel re former BD EDs.	0.3	
5/17/2021	BBK	Emailing B. Umpierre re Sunrise investigator rates.	0.1	
5/17/2021	BBK	Analyzing key word search results for targeted searches for 30(b)(6) Topic 10 and drafting proposed narrowing.	0.8	
5/17/2021	BBK	Conferring w/ co-counsel re plan for 5/19 meet and confer w/ Ds and joint discovery letter briefs.	0.1	
5/17/2021	JSY	Emails re document review.	0.1	
5/17/2021	JSY	Emails re training materials letter brief.	0.1	
5/17/2021	AX	Review search terms for PMK topic #11 document review.	0.8	
5/17/2021	AX	Phone calls with KES and GCG re substitution motion, sealing motion, and related issues to filing.	1.1	
5/17/2021	AX	Review and revise substitution motion, sealing motion, proposed orders, declarations, and all materials prior to filing.	4.2	
5/17/2021	KES	Revise and finalize exhibits and file motion to substitute and related motion to seal.	3.2	
5/17/2021	KES	Review and revise search terms for 30b6 Topic 10 review batches; follow up re Topic 11 revised search terms.	1.0	
5/18/2021	GCG	Meet w/ KES and AX re service of motion to substitute.	0.5	
5/18/2021	GCG	Review letter from GM re contacts w/ putative class member.	0.1	
5/18/2021	GCG	Revise letters to heirs.	0.2	
5/18/2021	BBK	Reviewing G. Maatman letter to Ds re contacts w/ putative class members.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/18/2021	BBK	Conferring w/ GCG re former BD EDs.	0.2	
5/18/2021	BBK	Reviewing emails re 5/19 meet and confer.	0.1	
5/18/2021	BBK	Drafting/sending emails to investigators.	0.2	
5/18/2021	BBK	Emailing w/ JSY and AX re outreach to investigators.	0.2	
5/18/2021	BBK	Conferring w/ investigator re meeting on 5/20.	0.1	
5/18/2021	BBK	Conferring w/ litigation team re meeting on class member declarations.	0.1	
5/18/2021	JSY	Emails re PI call re ED declarations.	0.1	
5/18/2021	AX	Communicate with team and coordinate mailings to heirs of deceased Brookdale named plaintiffs re substitution, sealing motions and related filings.	3.7	
5/18/2021	AX	Review related correspondence with team and opposing counsel, discovery responses and draft letter brief re: training materials and records.	3.8	
5/18/2021	EH	Correspondence with client re class cert declaration.	0.3	
5/18/2021	KES	Prepare and arrange for delivery of chambers copies of substitution motion.	2.0	
5/18/2021	KES	QC, organize N&As with copies of substitution motion for service on plaintiff relatives.	2.5	
5/18/2021	KES	Review and revise search terms for Topic 10 and 11 depo doc review.	0.4	
5/19/2021	GCG	Emails to AX and team re follow up to filing of motion to substitute.	0.2	
5/19/2021	AX	Call w/ MJ, RS, TC re meet and confer issues.	0.4	
5/19/2021	AX	Meet and confer w/ Brookdale.	1.2	
5/19/2021	AX	Prepare for meet and confer call.	0.6	
5/19/2021	AX	Review Jeffrey Toomer deposition transcript.	0.3	
5/19/2021	AX	Correspondence w/ team re: mailings for substitution and related motions.	0.2	
5/19/2021	KES	Follow up with GM re service of motion on plaintiff relatives.	0.4	
5/19/2021	KES	Review and revise 30b6 Topic 10 and 11 document search terms, run test searches for same and email R. Bonner re same.	2.6	
5/19/2021	KES	Emails with court reporter and team re PDF and upload versions of Toomer depo transcript.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/19/2021	KES	Calendar additional confirmed deposition dates.	0.2	
5/19/2021	KES	Review all confirmed 30b6 deposition information and schedule with court reporter.	1.0	
5/20/2021	GCG	Meet w/ BBK, JSY and AX re gathering declarations from former employees and other class cert tasks.	0.4	
5/20/2021	GCG	Follow up emails re retention of investigators.	0.1	
5/20/2021	BBK	Conferring w/ KES re conducting targeted keyword searches for 30b6 Topic 10 deposition.	0.1	
5/20/2021	BBK	Conferring w/ AX re meeting w/ investigators.	0.1	
5/20/2021	BBK	Analyzing list of former BD Executive Directors.	1.7	
5/20/2021	BBK	Reviewing AX report to RBGG team re 5/19 meet and confer on discovery disputes.	0.1	
5/20/2021	BBK	Conferring w/ GCG/JSY/AX re former BD employees.	0.1	
5/20/2021	BBK	Meeting w/ GCG/JSY/AX re former BD employees.	0.6	
5/20/2021	BBK	Preparing for phone call w/ investigator.	0.3	
5/20/2021	BBK	Phone call w/ investigator.	0.6	
5/20/2021	BBK	Drafting report/recommendation to team re phone call w/ investigator.	0.4	
5/20/2021	BBK	Conferring w/ JSY and GCG re retainer for investigator.	0.1	
5/20/2021	JSY	Meeting re PI; research re cost of same; emails re same.	0.7	
5/20/2021	JSY	Emails re class member declarations.	0.1	
5/20/2021	AX	Draft email summary to team re meet and confer efforts.	0.4	
5/20/2021	AX	Meeting w/ BBK, GCG, JSY re Brookdale investigator and review list of former EDs.	0.7	
5/20/2021	AX	Review team correspondence re scheduling PMK depositions and other case topics.	0.2	
5/20/2021	KES	Download and circulate depo errata sheet.	0.1	
5/20/2021	KES	Review court reporter depo confirmations and email team re same.	0.3	
5/20/2021	KES	Calendar substitution motion deadlines.	0.4	
5/20/2021	KES	Review and summarize additional personnel reports produced by Defendants in connection with meet and confer.	3.2	
5/21/2021	GCG	Review GW edits to putative class member declarations.	0.2	
5/21/2021	GCG	Review GW memo re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/21/2021	GCG	Meet w/ GW, SW and RBGG teams to discuss same and prepare for class cert.	1.3	
5/21/2021	JSY	Meeting re class member declarations and other class cert tasks.	1.5	
5/21/2021	JSY	Review letter brief re ESI; emails re same.	0.2	
5/21/2021	AX	Call w/ team re case issues in document review.	0.5	
5/21/2021	AX	Call w/ GW, MJ, TW, RS, GCG, JSY, EH, KES re case issues and issues re class member declarations.	1.5	
5/21/2021	AX	Email correspondence w/ team re class member declaration and protective orders and phone call w/ JSY re same.	0.2	
5/21/2021	AX	Review and update case tasks list.	0.4	
5/21/2021	AX	Review and revise letter brief re: post April 2020 ESI.	0.5	
5/21/2021	EH	Conference with team re motion for class certification and outstanding tasks.	1.4	
5/21/2021	EH	Reviewed and organized to file draft class member declarations in support of motion for class cert.	0.4	
5/21/2021	KES	Team and co-counsel Zoom meetings re doc review, class cert issues.	2.0	
5/21/2021	KES	Emails to team doc reviewers re key documents for other 30b6 topics.	0.5	
5/21/2021	KES	Overview of declarant list in Sharepoint and follow up re contacts with R. Steyer.	0.6	
5/21/2021	KES	Follow up with R. Bonner re 30b6 Topic 10 and 11 review batches and coding issues.	0.5	
5/21/2021	KES	Overview of Topic 11 review batches in prep for review assignments.	0.6	
5/22/2021	GCG	Emails to ADA experts re reports and RBGG team re declaration gathering.	0.2	
5/24/2021	BBK	Reviewing comm'ns w/ team and G. Maatman re joint discovery letter briefs on Ds' request for PO and ESI.	0.1	
5/24/2021	BBK	Reviewing comm'ns w/ litigation team re class member declarations.	0.1	
5/24/2021	JSY	Emails re class member declaration.	0.3	
5/24/2021	JSY	Research re former EDs; calls to same; emails re same.	0.5	
5/24/2021	AX	Correspondence w/ team re prior Brookdale executive directors.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/24/2021	AX	Meeting with KES, EH, LW re Brookdale document review for PMK deposition.	0.7	
5/24/2021	AX	Email correspondence re parameters for same.	0.3	
5/24/2021	AX	Review emails and documents and draft deposition outline.	3.2	
5/24/2021	EH	Conference with team re 306B topic 11 deposition and document review.	0.9	
5/24/2021	KES	Overview of batched documents for 30b6 Topic 11.	2.0	
5/24/2021	KES	Team Zoom re strategy for review of docs for 30b6 Topic 11 depo prep.	0.8	
5/24/2021	KES	Review and summarize documents in preparation for 30b6 Topic 11 depo.	3.7	
5/24/2021	LHW	Zoom meeting re: review of documents of upcoming deposition.	0.9	
5/25/2021	BBK	Emailing w/ investigator.	0.1	
5/25/2021	BBK	Reviewing comm'ns w/ opposing counsel re 30(b)(6) depositions.	0.1	
5/25/2021	BBK	Reviewing JSY update re calls w/ former BD executive directors; conferring w/ team re same.	0.1	
5/25/2021	BBK	Reviewing final draft joint discovery letter briefs on Ds' request for protective order and outstanding ESI.	0.2	
5/25/2021	BBK	Preparing for call w/ investigator.	0.2	
5/25/2021	BBK	Conferring by phone w/ investigator.	0.4	
5/25/2021	BBK	Drafting report and recommendation to RBGG team re investigator.	0.3	
5/25/2021	BBK	Meeting w/ RBGG team re class member declarations ISO cert motion.	0.5	
5/25/2021	BBK	Emailing w/ RBGG team & R. Steyer re class member declarations ISO cert motion.	0.1	
5/25/2021	JSY	Calls and emails to former EDs; emails re same.	0.2	
5/25/2021	JSY	Meeting re class member declarations.	0.6	
5/25/2021	JSY	Calls and emails re class member declaration process.	1.5	
5/25/2021	AX	Review documents and draft outline re PMK deposition.	3.2	
5/25/2021	AX	Email correspondence re: class member declarations and sharepoint access.	0.4	
5/25/2021	AX	Meeting with BBK, JSY, EH, KES re class member declarations.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/25/2021	AX	Draft update to class member outreach script.	0.7	
5/25/2021	EH	Drafted memo to file re budget-related content in review of ED/DDO deposition transcripts (in preparation for 306b Topic 11 deposition).	4.5	
5/25/2021	EH	Conference re motion for class cert.	0.5	
5/25/2021	KES	Review EH summary 30b6 Topic 11 issues in depos.	0.4	
5/25/2021	KES	Download and circulate discovery letter briefs.	0.2	
5/25/2021	KES	Emails with R. Bonner re adjustments to 30b6 document review batches, coding.	0.3	
5/25/2021	KES	Review Sharepoint and other information re draft declarations.	0.6	
5/25/2021	KES	Team Zoom re finalizing declarations.	0.5	
5/25/2021	KES	Continue review and summary of documents for 30b6 Topic 11 depo prep.	4.0	
5/25/2021	LHW	Document review in Relativity.	5.4	
5/26/2021	GCG	Conf w/ and email ADA experts, GW and MJ re class certification reports.	0.6	
5/26/2021	GCG	Conf w/ JSY and AX re follow up on substitution motion and declaration gathering.	0.4	
5/26/2021	GCG	Revise case task list.	0.2	
5/26/2021	BBK	Conferring w/ RBGG team re doc analysis for 30(b)(6) deposition topic 10.	0.1	
5/26/2021	BBK	Reviewing email updates re class member declarations.	0.1	
5/26/2021	JSY	Email with former ED.	0.1	
5/26/2021	JSY	Conf. w/ GCG re status of class cert prep.	0.2	
5/26/2021	JSY	Emails and calls re class member declaration process; edit same.	2.0	
5/26/2021	AX	Review documents and emails re PMK topic #11.	2.2	
5/26/2021	AX	Follow up with Brookdale plaintiffs' heirs re: substitution motion and related correspondence w/ team.	0.8	
5/26/2021	AX	Email correspondence w/ Titan and third parties re subpoena issues.	0.3	
5/26/2021	EH	Revised two class member declarations in support of motion for class cert.	0.8	
5/26/2021	KES	Set up Docusign and review tutorial.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/26/2021	KES	Continue review and summary of documents in preparation for 30b6 Topic 11 depo.	5.5	
5/26/2021	LHW	Review documents in Relativity.	5.5	
5/27/2021	GCG	Email to BBK re retention of investigator.	0.1	
5/27/2021	BBK	Reviewing comm'ns w/ opposing counsel re discovery letter brief on employee-related docs.	0.1	
5/27/2021	BBK	Reviewing/revising draft retainer agreement w/ investigator.	0.2	
5/27/2021	BBK	Conferring w/ GCG re retainer agreements w/ investigators.	0.1	
5/27/2021	BBK	Preparing prioritized lists of former BD executive directors.	1.6	
5/27/2021	AX	Review emails and documents re PMK deposition topic #11 re budget creation and draft deposition outline.	4.2	
5/27/2021	AX	Review EH memo re budget processes.	0.5	
5/27/2021	AX	Review draft letter briefs and correspondence re same.	0.6	
5/27/2021	AX	Review correspondence from team re private investigator.	0.2	
5/27/2021	AX	Review correspondence from team re scheduling PMK depositions.	0.2	
5/27/2021	AX	Correspondence w/ team re heirs and acknowledgments for substitution motion.	0.2	
5/27/2021	EH	Document review for 306b Topic 11 deposition.	1.5	
5/27/2021	KES	Continue review and analysis of docs for Topic 11 depo prep.	6.5	
5/27/2021	KES	Follow up re 6/3 depo.	0.1	
5/27/2021	KES	Download and circulate discovery letter brief.	0.1	
5/27/2021	KES	Emails re service of substitution motion.	0.1	
5/27/2021	LHW	Review documents in Relativity.	5.1	
5/28/2021	GCG	Meet w/ GW and team to discuss class cert planning.	0.5	
5/28/2021	GCG	Internal RBGG meeting re same.	0.5	
5/28/2021	BBK	Preparing prioritized lists of former BD executive directors.	1.8	
5/28/2021	BBK	Drafting retainer agreement for investigator.	0.3	
5/28/2021	BBK	Further revisions to retainer agreement for investigator.	0.1	
5/28/2021	BBK	Drafting/sending emails to investigators.	0.3	
5/28/2021	BBK	Co-counsel meeting re class cert preparation.	0.5	
5/28/2021	BBK	RBGG team meeting re class cert preparation.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/28/2021	BBK	Reviewing MJ Beeler's discovery order on pending discovery letter briefs.	0.1	
5/28/2021	BBK	Conferring w/ JSY/AX re discovery order and planned joint discovery ltr brief on training materials.	0.3	
5/28/2021	BBK	Reviewing MJ emails w/ Ds re meeting and conferring on 30(b)(6) depositions and discovery disputes.	0.1	
5/28/2021	JSY	Emails re discovery order and further letter briefs.	0.2	
5/28/2021	AX	Review letter brief re training materials.	0.4	
5/28/2021	AX	Meeting with attorneys and document review team re Brookdale discovery for depositions and ongoing meet and confer issues.	0.5	
5/28/2021	AX	Meeting with attorneys re case tasks, strategy, and class certification issues.	0.7	
5/28/2021	AX	Communications with internal teams and KC re substitution motion acknowledgment.	0.6	
5/28/2021	AX	Review email correspondence re discovery letter briefs.	0.3	
5/28/2021	AX	Review pendant response data and create index.	2.3	
5/28/2021	AX	Review privilege log and Brookdale letters re same for response.	1.3	
5/28/2021	EH	Conference with team re motion for class cert.	1.0	
5/28/2021	EH	Document review for 306b Topic 11 deposition.	2.4	
5/28/2021	KES	Team doc review and class cert prep Zoom meeting.	1.3	
5/28/2021	KES	Emails w R. Bonner, AX re produced pendant data.	0.4	
5/28/2021	KES	Email B. Umpierre re upcoming depo.	0.1	
5/28/2021	KES	Email team re CapEx related docs and review docs re same.	0.8	
5/28/2021	KES	Continue review and analysis of docs for Topic 11 depo prep.	3.0	
5/28/2021	LHW	Review documents in Relativity.	4.8	
5/29/2021	GCG	Review 9th Circuit case re preponderance standard in class cert and email to GW re same.	0.2	
5/29/2021	GCG	Review Judge Beeler discovery order and email to RBGG team re same.	0.2	
5/30/2021	GCG	Email to GW and declarant re class cert issues.	0.2	
5/31/2021	GCG	Conf w/ MJ and emails to JSY and team re outstanding discovery issues and motion for class cert.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/31/2021	BBK	Conferring w/ litigation team re status of outstanding discovery issues.	0.1	
5/31/2021	JSY	Emails re discovery issues and order re MTC.	0.2	
5/31/2021	EH	Document review for 306b Topic 11 deposition.	1.0	
6/1/2021	GCG	Conf w/ JSY and emails to AX, BBK and JSY re gathering declarations and preparing for depositions.	0.1	
6/1/2021	GCG	Conf w/ KES re document review.	0.1	
6/1/2021	BBK	Conferring w/ GCG re retainer agreement for investigator.	0.1	
6/1/2021	BBK	Finalizing/sending signed retainer agreement to investigator.	0.2	
6/1/2021	BBK	Finalizing/sending retainer agreement to investigator.	0.2	
6/1/2021	BBK	Reviewing JSY-G.Maatman comm'ns re Bowman deposition; conferring w/ team re same.	0.1	
6/1/2021	BBK	Conferring w/ co-counsel re status of pendant data production and FU w/ Ds re same.	0.1	
6/1/2021	BBK	Reviewing Ds' non-opposition to motion for substitution of parties and conferring w/ team re same.	0.1	
6/1/2021	JSY	Emails re KB deposition.	0.1	
6/1/2021	JSY	Edit CM declarations; calls re same; emails re same.	1.0	
6/1/2021	JSY	Emails re substitution motion.	0.1	
6/1/2021	AX	Review pendant data and correspondence w/ team and opposing counsel re same.	1.6	
6/1/2021	AX	Correspondence w/ EH re PMK topic 11 in preparation for deposition.	0.2	
6/1/2021	EH	Analyzing and drafting memo to file re documents related to budgetary items for upcoming deposition.	5.0	
6/1/2021	EH	Revising declarations ISO motion for class cert.	1.7	
6/1/2021	KES	Download and circulate Defs non-opposition to substitution.	0.1	
6/1/2021	KES	Review status of signed N&As for substitution motion.	0.5	
6/1/2021	KES	Complete review and summary of portion of documents for 30b6 depo Topic 11 prep.	9.5	
6/1/2021	KES	Review and download supporting documents for declarants.	0.4	
6/1/2021	LHW	Document review in Relativity.	4.5	
6/2/2021	GCG	Email to KS and GW re call w/ settlement liaison.	0.1	
6/2/2021	GCG	Review order re substitution.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/2/2021	GCG	Emails JSY, AX and team re decision granting motion to substitute.	0.1	
6/2/2021	BBK	Reviewing JSY-GW comm'ns re potential class cert declarants.	0.1	
6/2/2021	BBK	Preparing objectives for 30b6 Topic 10 deposition.	0.7	
6/2/2021	BBK	Reviewing Court Order granting motion for substitution of parties and conferring w/ team re same.	0.1	
6/2/2021	BBK	Analyzing documents relevant to 30b6 Topic 10 deposition.	0.5	
6/2/2021	BBK	Conferring w/ KES/LW/EH re meeting on 6/3 re doc analysis for 30b6 Topic 10 deposition.	0.1	
6/2/2021	BBK	Drafting big picture objectives for doc analysis for 30b6 Topic 10 deposition for KES/LW/EH.	0.3	
6/2/2021	JSY	Conf. w/ GCG re status of discovery issues and class member declarations.	0.2	
6/2/2021	JSY	Review class member declarants and declarations; emails re same.	1.5	
6/2/2021	EH	Revising four class member declarations in support of motion for class certification.	3.4	
6/2/2021	EH	Analyzing documents for 30B6 deposition re budgets.	2.3	
6/2/2021	EH	Drafting and finalizing memo to file re analysis of document production for 30b6 deposition re training.	2.3	
6/2/2021	LHW	Document review in Relativity; prepare memo re: Topic 11.	2.0	
6/3/2021	GCG	Conf w/ GW, KS and MJ re settlement overtures and mediation plan.	0.5	
6/3/2021	GCG	Conf w/ BBK re ED declaration and preparation for 30(b)(6) depo.	0.2	
6/3/2021	GCG	Email to KES re declarant signature.	0.1	
6/3/2021	GCG	Review and annotate Harris depo.	0.5	
6/3/2021	GCG	Draft memo to file re conversations w/ named plaintiffs.	0.2	
6/3/2021	BBK	Emailing w/ investigator re former BD employees.	0.1	
6/3/2021	BBK	Drafting recommendation to RBGG team re outreach to former BD employees.	0.3	
6/3/2021	BBK	Conferring by phone w/ investigator.	0.2	
6/3/2021	BBK	Reviewing/analyzing 2021 Brookdale policy docs to ID key issues for 30b6 Topic 10 deposition.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/3/2021	BBK	Meeting w/ KES/LW/EH re doc analysis for 30b6 Topic 10 deposition.	0.9	
6/3/2021	BBK	Reviewing/revising KES final draft class member declaration.	0.6	
6/3/2021	BBK	Conferring by phone w/ GCG re BD projects.	0.2	
6/3/2021	BBK	Reviewing MJ update re status of discovery FU w/ Ds.	0.1	
6/3/2021	JSY	Emails re CM declarations.	0.1	
6/3/2021	EH	Conference with team re 30b6 deposition topic 10.	0.9	
6/3/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 10.	1.7	
6/3/2021	FFV	Draft memo to file re attorney notes.	0.3	
6/3/2021	LHW	Attend Zoom meeting with Team re: Topic 10.	1.0	
6/4/2021	GCG	Participate in meeting w/ Schneider Wallace to plan class certification motion.	0.6	
6/4/2021	GCG	Follow up conferences w/ RBGG team re gathering declarations and 301(b)(6) deposition preparation.	0.5	
6/4/2021	GCG	Revise memo to file re communications w/ class reps and email team re same.	0.2	
6/4/2021	GCG	Review defendant's chart re supposed non-operation.	0.1	
6/4/2021	BBK	Reviewing investigator report re former BD employees.	0.2	
6/4/2021	BBK	Meeting w/ co-counsel re class cert.	0.6	
6/4/2021	BBK	Meeting w/ RBGG team re class cert.	0.4	
6/4/2021	BBK	Reviewing M&C emails w/ Ds re outstanding discovery.	0.1	
6/4/2021	BBK	Conferring w/ investigators re former BD employees.	0.2	
6/4/2021	BBK	Conferring w/ KES re 30b6 Topic 10 deposition doc analysis.	0.1	
6/4/2021	BBK	Conferring w/ EH re analysis of deposition transcripts for relevant testimony for 30b6 Topic 10 deposition.	0.1	
6/4/2021	BBK	Conferring w/ JSY and AX re Ds' response to request to re-set Bowman deposition date.	0.1	
6/4/2021	BBK	Reviewing materials in prep for revising class cert declarations.	0.6	
6/4/2021	AX	Strategy meetings with team re case tasks and class certification strategy.	1.5	
6/4/2021	AX	Email correspondence re meet and confer for pendant issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/4/2021	AX	Analyze memos and documents re documents for PMK deposition.	2.2	
6/4/2021	AX	Draft deposition outline.	2.5	
6/4/2021	EH	Conference with team re motion for class certification.	0.9	
6/4/2021	EH	Drafting memo to file re notes from weekly discussion with co-counsel about motion for class cert.	0.4	
6/4/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 10.	3.4	
6/4/2021	LHW	Review documents in Relativity re: Topic 10.	6.5	
6/5/2021	GCG	Review ADA expert report; email expert re same.	0.1	
6/5/2021	GCG	Review and annotate Harris deposition.	0.8	
6/5/2021	BBK	Conferring w/ EH re memo on depo testimony relevant to 30b6 Topic 10 deposition.	0.1	
6/5/2021	AX	Analyze documents, prepare outline for PMK topic #11 deposition.	6.2	
6/5/2021	EH	Drafting and finalizing memo to file re ED/DDO deposition testimony for 30b6 depo re quality of care.	3.5	
6/6/2021	GCG	Emails to AX re deposition preparation and GG and JM re expert reports.	0.1	
6/6/2021	AX	Analyze documents, prepare outline for PMK topic #11 deposition.	9.4	
6/7/2021	GCG	Work on ADA expert reports.	0.2	
6/7/2021	GCG	Conf w/ EG and email to CG re same.	0.1	
6/7/2021	BBK	Conferring w/ JSY/AX re 30b6 Topic 11 deposition prep.	0.4	
6/7/2021	BBK	Conferring w/ litigation team re transcript from 30b6 Topic 3 deposition.	0.1	
6/7/2021	BBK	Conferring w/ RBGG team re outreach to putative class members re declarations.	0.2	
6/7/2021	BBK	Conferring w/ co-counsel re Bowman deposition scheduling and 2020 ESI production.	0.1	
6/7/2021	BBK	Conferring w/ KES/LW re analysis of docs for 30b6 Topic 10 deposition.	0.1	
6/7/2021	BBK	Reviewing EH and LW memos re analysis of Bowman emails re complaints/DSS/pendant data.	0.5	
6/7/2021	BBK	Reviewing MJ updated report re status of outstanding discovery issues.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/7/2021	BBK	Reviewing MJ and RS comments on AX draft 30b6 Topic 11 deposition outline.	0.1	
6/7/2021	BBK	Revising draft decl from daughter of former BD San Dimas resident.	0.8	
6/7/2021	JSY	Emails re KB individual depo.	0.2	
6/7/2021	JSY	Review and edit AX depo outline re PMK topic 11.	1.0	
6/7/2021	JSY	Reviewed and edited CM declarations; review opt out list re same; emails re same.	2.3	
6/7/2021	AX	Draft deposition outline and circulate to team.	1.5	
6/7/2021	AX	Revise deposition outline based on RS, MJ, JSY comments.	3.5	
6/7/2021	AX	Review deposition materials.	1.5	
6/7/2021	LHW	Review documents in Relativity re: Topic 10.	3.2	
6/8/2021	GCG	Conf w/ AX and emails to MJ, JY and team re preparation for 30(b)(6) deposition.	0.2	
6/8/2021	GCG	Email to GW and MJ and conf w/ CG re expert report drafting.	0.1	
6/8/2021	GCG	Emails to KES and team re class member declaration.	0.2	
6/8/2021	GCG	Email to BBK re former ED declarations.	0.1	
6/8/2021	BBK	Reviewing memo from investigator re interviews w/ former BD employees and drafting report to RBGG team re same.	0.2	
6/8/2021	BBK	Reviewing AX report re talking points for M&C on pendant data.	0.1	
6/8/2021	BBK	Analyzing residency agreements and intake notes for former BD San Dimas resident and revising draft decl by daughter accordingly.	1.5	
6/8/2021	BBK	Conferring by phone w/ JSY re class declarations and interview w/ former BD employee.	0.4	
6/8/2021	BBK	Reviewing T. Close report re DSS RCFE key indicator tools.	0.1	
6/8/2021	BBK	Conferring w/ RBGG team re potential current memory care resident and declarant.	0.2	
6/8/2021	BBK	Reviewing MJ-G. Maatman emails re outstanding discovery and ongoing disputes.	0.1	
6/8/2021	BBK	Meeting w/ co-counsel re strategy for upcoming 30b6 depositions.	1.0	
6/8/2021	BBK	Conferring w/ JSY and AX re prep for 30b6 Topic 11 deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/8/2021	BBK	Conferring w/ JSY and GCG re progress on class member declaration-gathering project.	0.1	
6/8/2021	JSY	Conf. w/ GCG re CM declarations and Topic 11 deposition prep.	0.1	
6/8/2021	JSY	Emails re CM declarations; edit same.	0.3	
6/8/2021	JSY	Conf. w/ BBK re CM declarations and former ED declarations.	0.5	
6/8/2021	JSY	Call re prep for Topic 11 depo.	0.9	
6/8/2021	AX	Prepare for meet and confer call including correspondence w/ MJ.	0.8	
6/8/2021	AX	Attend meet and confer call and draft notes re same.	1.5	
6/8/2021	AX	Phone calls with MJ, GW re strategy for PMK depositions.	0.8	
6/8/2021	AX	Revise deposition outline and review relevant documents in preparation for deposition.	4.5	
6/8/2021	LHW	Review documents in Relativity re: Topic 10.	1.0	
6/9/2021	GCG	Conf w/ AX and emails to JSY re Bowman testimony re budgets as PMK.	0.2	
6/9/2021	GCG	Conf w/ and email to BBK re class member and ED declarations and preparation for next PMK deposition.	0.3	
6/9/2021	BBK	Conferring w/ team re admissions obtained during AX 30b6 Topic 11 deposition.	0.1	
6/9/2021	BBK	Reviewing comm'ns re deposition logistics and obtaining expedited rough transcript for 30b6 Topic 11 depo.	0.1	
6/9/2021	BBK	Prep for call w/ potential class declarant (daughter of former BD San Dimas resident).	0.2	
6/9/2021	BBK	Conferring by phone w/ potential class declarant (daughter of former BD San Dimas resident).	0.7	
6/9/2021	BBK	Updating RBGG team re call w/ potential class declarant (daughter of former BD San Dimas resident).	0.1	
6/9/2021	BBK	Revising draft decl from daughter of former BD San Dimas resident per phone-call.	1.3	
6/9/2021	BBK	Conferring by phone w/ GCG re 30b6 deposition and declaration-gathering.	0.2	
6/9/2021	BBK	Drafting/sending email to GW re final draft decl from daughter of former BD San Dimas resident.	0.1	
6/9/2021	BBK	Reviewing AX and JSY reports re 30b6 Topic 11 deposition.	0.1	
6/9/2021	BBK	Reviewing MJ comm'ns w/ opposing counsel re discovery letter briefs and outstanding disputes.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/9/2021	BBK	Conferring w/ KES re performance reviews for former BD employee in advance of interview.	0.1	
6/9/2021	JSY	Attend and assist with Topic 11 depo; emails and calls re same.	5.0	
6/9/2021	JSY	Draft and edit CM declarations; calls re same.	1.5	
6/9/2021	AX	Take PMK topic #10 deposition.	4.0	
6/9/2021	AX	Preparation for deposition.	1.2	
6/9/2021	AX	And related conferring with JSY, MJ, GW.	0.8	
6/9/2021	AX	Email summary of deposition to team.	0.5	
6/9/2021	AX	Email correspondence w/ DM re pendant response data.	0.2	
6/9/2021	AX	email correspondence w/ plaintiffs re substitution motion.	0.3	
6/9/2021	LHW	Review documents in Relativity re: Topic 10.	6.5	
6/10/2021	GCG	Conf w/ AX re 30(b)(6) deposition and motion to substitute follow up.	0.1	
6/10/2021	GCG	Conf w/ KES re document searches and class member declarations.	0.2	
6/10/2021	GCG	Emails to JSY and team re same and preparation for depositions.	0.1	
6/10/2021	GCG	Emails to JM re expert report writing.	0.1	
6/10/2021	BBK	Conferring w/ KES and LW re doc analysis for 30b6 Topic 10 deposition.	0.4	
6/10/2021	BBK	Reviewing EH memos re analysis of prior deposition testimony relevant to 30b6 Topic 10 depo.	0.2	
6/10/2021	BBK	Drafting/sending assignment to KES re locating key docs ID'd in DDO Playbook.	0.2	
6/10/2021	BBK	Reviewing LW memo re doc analysis for 30b6 Topic 10 depo.	0.2	
6/10/2021	BBK	Conferring w/ KES re documentation re FOCUS process and CARE process.	0.2	
6/10/2021	BBK	Analyzing docs relevant to 30b6 Topic 10 deposition.	2.4	
6/10/2021	BBK	Conferring w/ JSY re locating contact info for potential class declarant and assisting w/ same.	0.2	
6/10/2021	BBK	Revise declaration by daughter of former BD San Dimas resident.	0.2	
6/10/2021	BBK	Finalize declaration by daughter of former BD San Dimas resident.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/10/2021	BBK	Conferring by phone w/ daughter of former BD San Dimas resident re declaration.	0.7	
6/10/2021	BBK	Preparing/sending for signature via DocuSign final draft decl from daughter of former BD San Dimas resident.	0.3	
6/10/2021	BBK	Conferring w/ RBGG team re finalizing decl from daughter of former BD San Dimas resident.	0.1	
6/10/2021	BBK	Reviewing performance reviews of former ED and DDO.	0.3	
6/10/2021	BBK	Conferring w/ JSY and AX re prep for 30b6 Topic 10 depo.	0.3	
6/10/2021	BBK	Conferring w/ JSY and AX re Ds' decision to designate same PMK for two 30b6 depo topics on same date.	0.2	
6/10/2021	JSY	Emails re substitution of parties and caption.	0.1	
6/10/2021	JSY	Review depo transcripts and outlines; emails re same.	1.1	
6/10/2021	JSY	Edit CM declarations; emails re same.	2.9	
6/10/2021	AX	Draft and review materials re: POS and motion to seal, including conferring with KES re same.	2.5	
6/10/2021	AX	Correspondence w/ team re discovery and 30b6 deposition issues.	0.2	
6/10/2021	AX	Correspondence w/ DM re pendant data analysis.	0.5	
6/10/2021	AX	Review Bowman rough transcript of deposition.	0.9	
6/11/2021	GCG	Participate in meeting w/ SW re class cert strategy.	0.9	
6/11/2021	GCG	Follow up conf w/ RBGG team and emails to JSY and team re declaration gathering.	0.1	
6/11/2021	GCG	Email to MJ and JSY re corporate ownership and training deposition.	0.1	
6/11/2021	BBK	Conferring w/ co-counsel re withdrawing depo notice for Bowman and noticing depo of Director of Service Alignment.	0.1	
6/11/2021	BBK	Conferring w/ GW and MJ re 30b6 depositions on 6/17.	0.2	
6/11/2021	BBK	Planning/preparing for call w/ former ED/DDO.	0.5	
6/11/2021	BBK	Calling/leaving messages for former ED/DDO.	0.1	
6/11/2021	BBK	Reviewing Bowman Decl ISO Ds' motion to deny class cert.	0.1	
6/11/2021	BBK	Conferring w/ JSY/AX re class cert declaration-gathering.	0.2	
6/11/2021	BBK	Meeting w/ co-counsel on strategy/tasks for class cert.	1.0	
6/11/2021	BBK	Meeting w/ RBGG team on strategy/tasks for class cert.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/11/2021	BBK	Reviewing MJ-JSY-TC comm'ns re confirming BD ownership/operation of all CA facilities.	0.1	
6/11/2021	BBK	Reviewing AX notes from 6/8 meet and confer on training docs and pendant data.	0.1	
6/11/2021	BBK	Analyzing relevant documents for 30b6 Topic 10 deposition.	1.3	
6/11/2021	BBK	Preparing for 30b6 Topic 10 deposition.	1.2	
6/11/2021	BBK	Reviewing MJ emails w/ opposing counsel re joint discovery letter briefs and addressing inconsistent 30b6 deposition testimony.	0.1	
6/11/2021	JSY	Team meeting re class cert and depositions; conf. re CM declarations.	1.5	
6/11/2021	JSY	Conf. w/ JA re status; emails re same.	0.3	
6/11/2021	JSY	Emails re training deposition.	0.1	
6/11/2021	JSY	Review and edit CM declarations; emails re same; t/c re same.	1.0	
6/11/2021	JSY	Emails re owner/operator issue; review memo re same.	1.0	
6/11/2021	AX	Strategy meetings with document review and broader attorney team re case tasks and class certification issues.	2.0	
6/11/2021	AX	Draft POS and related sealing motion for substitution issues.	1.0	
6/11/2021	AX	Draft summary of meet and confer issues.	0.5	
6/12/2021	GCG	Emails to BBK and team re class member declaration gathering.	0.1	
6/12/2021	BBK	Conferring w/ daughter of former BD San Dimas resident re declaration; updating RBGG team re same.	0.1	
6/12/2021	BBK	Reviewing deposition transcripts for 30b6 depos.	1.0	
6/12/2021	BBK	Analyzing documents relevant for 30b6 Topic 10 depo.	1.1	
6/13/2021	GCG	Review and annotate Buot deposition.	0.5	
6/13/2021	GCG	Email to BBK re same and re 30(b)(6) deposition.	0.1	
6/13/2021	GCG	Emails to JSY and MJ re training deposition.	0.2	
6/13/2021	GCG	Review and analyze MJ communications re multiple discovery issues.	0.8	
6/13/2021	BBK	Analyzing docs relevant to 30b6 Topic 10 deposition.	1.9	
6/13/2021	BBK	Reviewing GCG annotations on Buot Deposition transcript.	0.3	
6/13/2021	BBK	Reviewing MJ emails w/ opposing counsel re supplemental discovery and negotiations over 30b6 depos.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/13/2021	JSY	Emails re training depo.	0.1	
6/13/2021	EH	Revising class member declaration ISO motion for class cert.	4.0	
6/14/2021	GCG	Emails to BBK and JSY re various discovery tasks.	0.1	
6/14/2021	GCG	Email to GW and KS re mediation plan.	0.1	
6/14/2021	BBK	Conferring w/ JSY and AX re outreach to former BD Executive Director and DDO.	0.2	
6/14/2021	BBK	Conferring by phone w/ KES re 30b6 Topic 10 deposition document analysis.	0.9	
6/14/2021	BBK	Reviewing MJ comm'ns w/ opposing counsel re agreement on 30b6 Topic 5 deposition.	0.1	
6/14/2021	BBK	Conferring w/ investigator re witnesses.	0.1	
6/14/2021	BBK	Emailing w/ MJ and D. Marks re Ds' request to set 30b6 Topic 16 deposition on same date as Topic 10 deposition.	0.1	
6/14/2021	BBK	Conferring by email w/ KES re hot docs identified for 30b6 Topic 10 deposition.	0.2	
6/14/2021	BBK	Analyzing docs identified for 30b6 Topic 10 deposition.	1.6	
6/14/2021	BBK	Conferring w/ investigator re witnesses.	0.1	
6/14/2021	BBK	Outlining/preparing for 30b6 Topic 10 deposition.	3.7	
6/14/2021	JSY	Call with MTJ and TC re proving ownership and operating authority of facilities; emails re same.	1.0	
6/14/2021	JSY	Edit CM declarations; multiple calls re same.	1.5	
6/14/2021	AX	Review class member documentation re declarations and draft declarations.	2.7	
6/14/2021	AX	Review draft of PMK deposition outline.	0.5	
6/14/2021	EH	Calling potential class members re declarations ISO motion for class cert.	0.4	
6/15/2021	GCG	Review and revise motion to seal and proof of service re substitution motion.	0.4	
6/15/2021	GCG	Conf w/ AX and email to KES re same.	0.2	
6/15/2021	GCG	Conf w/ and email to BBK re preparation for PMK deposition.	0.3	
6/15/2021	BBK	Reviewing JSY report/notes from call w/ former BD employee; conferring w/ co-counsel re same.	0.2	
6/15/2021	BBK	Conferring w/ JSY and co-counsel re drafting declaration.	0.1	
6/15/2021	BBK	Conferring w/ GCG re 30b6 Topic 10 deposition by phone and email.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/15/2021	BBK	Reviewing MJ letter to Ds re outstanding discovery disputes.	0.1	
6/15/2021	BBK	Conferring w/ co-counsel and RBGG team re scheduling D. Marks' 30b6 Topic 12 deposition.	0.1	
6/15/2021	BBK	Analyzing hot docs identifying by LW for 30b6 Topic 10 deposition.	0.8	
6/15/2021	BBK	Conferring w/ RBGG team re progress on class member declaration gathering.	0.1	
6/15/2021	BBK	Conferring w/ AX re deposition master exhibits list.	0.1	
6/15/2021	BBK	Conferring w/ AX and JSY re 30b6 Topic 10 deposition.	0.1	
6/15/2021	BBK	Outlining/preparing for 30b6 Topic 10 deposition.	6.9	
6/15/2021	JSY	Emails re ownership issue.	0.1	
6/15/2021	JSY	Call with former employee; draft decl re same; multiple emails re same.	3.5	
6/15/2021	JSY	Edit CM declarations; emails re same; call with declarant re same.	2.3	
6/15/2021	AX	Review draft class member declarations and supporting documentation.	3.5	
6/15/2021	AX	call class members and discuss draft declarations.	0.5	
6/15/2021	EH	Analyzing residency agreements and intake forms, incorporating edits for six declarations iSO motion for class cert.	3.8	
6/16/2021	GCG	Conf w/ AX re filing of substitution POS and gathering declarations.	0.1	
6/16/2021	BBK	Conferring w/ KES re depositions.	0.1	
6/16/2021	BBK	Conferring w/ D. Marks re Topic 16 30b6 depo.	0.2	
6/16/2021	BBK	Conferring w/ KES re preparing exhibits for 30b6 Topic 10 depo.	0.2	
6/16/2021	BBK	Emailing w/ KES re exhibits for 30b6 Topic 10 depo.	0.1	
6/16/2021	BBK	Conferring by phone w/ KES re coordinating w/ court reporter re 30b6 Topic 10 and Topic 16 depos both occurring on 6/17.	0.2	
6/16/2021	BBK	Conferring w/ JSY/AX re class member declaration gathering.	0.1	
6/16/2021	BBK	Conferring w/ JSY/AX re 30b6 Topic 10 deposition and comments on outline.	0.3	
6/16/2021	BBK	Conferring w/ J Balette re master exhibits list for Ps' depositions.	0.2	
6/16/2021	BBK	Conferring w/ KES re confidentiality designations during depo.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/16/2021	BBK	Reviewing AX emails to opposing counsel re pendant data production and correcting transcript to number exhibits for 30b6 Topic 11 depo.	0.1	
6/16/2021	BBK	Outlining/preparing for 30b6 Topic 10 deposition and revising outline.	6.9	
6/16/2021	BBK	Preparing exhibits for 30b6 Topic 10 depo.	0.8	
6/16/2021	JSY	Calls with declarants; draft and edit CM declarations.	2.3	
6/16/2021	JSY	Review and edit BBK outline re Topic 10.	0.9	
6/16/2021	AX	Review PMK topic 10 transcript, exhibit index, and correspondence with team and opposing counsel re same.	1.5	
6/16/2021	AX	Call w/ GCG re case tasks.	0.1	
6/16/2021	AX	Correspondence w/ GCG, KES, and team re filing POS under seal and review of documents before filing.	0.8	
6/16/2021	AX	Draft class member declarations and review related documentation.	2.7	
6/17/2021	GCG	Review BBK email summarizing deposition.	0.1	
6/17/2021	GCG	Emails to JSY and team re class member declaration.	0.1	
6/17/2021	BBK	Preparing for 30b6 Topic 10 deposition.	0.9	
6/17/2021	BBK	Taking 30b6 Topic 10 deposition.	4.7	
6/17/2021	BBK	Conferring w/ J. Balette re 30b6 Topic 16 deposition.	0.1	
6/17/2021	BBK	Conferring w/ JSY and AX re 30b6 Topic 10 depo.	0.2	
6/17/2021	BBK	Conferring w/ GW re expedited transcript from 30b6 depos.	0.1	
6/17/2021	BBK	Conferring w/ court reporter re obtaining rough and expedited transcript from 30b6 depos.	0.2	
6/17/2021	BBK	Conferring w/ JSY re FU w/ investigators.	0.1	
6/17/2021	BBK	Conferring w/ JSY and AX re class member declarant gathering.	0.1	
6/17/2021	BBK	Drafting/sending summary of 30b6 Topic deposition to co-counsel and RBGG team.	0.6	
6/17/2021	JSY	Assist BBK in Topic 10 deposition; emails and conf. re same.	2.5	
6/17/2021	JSY	Emails re CB declaration; review edits re same.	0.4	
6/17/2021	JSY	Calls with declarants; edit same; finalize CM declaration.	2.7	
6/17/2021	AX	Call with class member declarant re declaration and review relevant documentation in preparation of call.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/17/2021	AX	Second chair deposition of PMK topic #11 and support BBK.	1.2	
6/17/2021	AX	Call with class member declarant and review relevant documentation in preparation for call.	1.0	
6/17/2021	AX	Draft class member declaration.	1.5	
6/18/2021	GCG	Meet w/ RBGG team to discuss declaration gathering and other projects for class cert.	0.7	
6/18/2021	GCG	Emails to JSY and team re declaration issues.	0.1	
6/18/2021	BBK	Reviewing G. Maatman responses to Ps' outreach re outstanding discovery disputes.	0.1	
6/18/2021	BBK	Conferring w/ court reporter re rough transcripts from 6/17 30b6 depos and sharing w/ team.	0.1	
6/18/2021	BBK	Reviewing/analyzing memo from investigator.	0.2	
6/18/2021	BBK	Drafting report/recommendations to RBGG team re FU from investigator report.	0.2	
6/18/2021	BBK	Conferring w/ investigator.	0.1	
6/18/2021	BBK	Meeting w/ RBGG team re class cert prep.	1.0	
6/18/2021	BBK	Conferring w/ B. Umpierre and RBGG team re class cert representative declarations.	0.2	
6/18/2021	BBK	Conferring w/ co-counsel and RBGG team re outreach to class members for declarations.	0.1	
6/18/2021	BBK	Conferring w/ co-counsel and RBGG team re training docs for 30b6 deposition.	0.1	
6/18/2021	JSY	Team meeting re CM declarations and other class-certification tasks.	1.0	
6/18/2021	JSY	Emails re training materials; prep for depo re same.	0.3	
6/18/2021	JSY	Edit and draft declarations from CM and former employees; calls re same; emails re same; finalize same.	4.0	
6/18/2021	AX	Strategy meeting with team re class certification case tasks.	1.0	
6/18/2021	AX	Draft class member declaration.	2.5	
6/18/2021	AX	Related correspondence w/ class members re class certification declarations.	0.5	
6/18/2021	AX	Email correspondence w/ team re pendant response data.	0.3	
6/18/2021	AX	Email correspondence w/ team re residency agreements.	0.5	
6/18/2021	EH	Drafting memo to file re notes from weekly discussion with co-counsel about motion for class cert.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/18/2021	EH	Conference with team re motion for class cert.	1.0	
6/18/2021	EH	Reviewing class cert declarations for ADA access concerns.	0.3	
6/18/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.6	
6/20/2021	GCG	Emails to GW, CG, JM and JSY re expert reports and class member declarations.	0.1	
6/20/2021	JSY	Emails re declarations.	0.1	
6/21/2021	GCG	Emails with JSY-KES and team regarding class member declarations and conference with JSY regarding same.	0.2	
6/21/2021	BBK	Reviewing putative class member declarations obtained by AX, JSY and KES.	0.2	
6/21/2021	BBK	Conferring w/ JSY re former BD executive directors.	0.1	
6/21/2021	BBK	Conferring w/ JSY and AX re class member declaration-gathering.	0.1	
6/21/2021	BBK	Conferring by phone w/ investigator.	0.2	
6/21/2021	BBK	Conferring w/ JSY and AX re investigation progress.	0.2	
6/21/2021	BBK	Conferring w/ team re 30b6 Topic 10 deposition transcript.	0.1	
6/21/2021	BBK	Reviewing AX-opposing counsel comm'ns re pendant data.	0.1	
6/21/2021	BBK	Searching for residency agreements for two former BD residents whose family are potential declarants.	0.5	
6/21/2021	BBK	Conferring w/ R. Steyer re locating residency agreements for former BD residents.	0.1	
6/21/2021	JSY	Calls to former employees re declarations; emails re same.	0.2	
6/21/2021	JSY	Review documents re training topic for depo; emails with EH re depo prep re same.	1.0	
6/21/2021	JSY	Draft declarations; review documents re same; t/c re same; emails re same.	3.8	
6/21/2021	AX	Email correspondence w/ team re issues with deposition transcripts.	0.2	
6/21/2021	AX	Email correspondence w/ US Legal re issues with deposition transcript indexes.	0.2	
6/21/2021	AX	Draft correspondence to opposing counsel re pendant data production and third party subpoenas, including coordination of data transfer and related correspondence w/ staff.	1.6	
6/21/2021	AX	Review PMK topic 10 index.	0.5	
6/21/2021	AX	Correspondence w/ team re class rep declarations.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/21/2021	AX	Review Brookdale pendant response data for Irvine, Diablo Lodge, Santa Monica Gardens.	0.5	
6/21/2021	AX	Review documents re: former ED at Chanate, draft questions for interview, and contact.	1.5	
6/21/2021	EH	Revising class rep declarations, incorporating information from ROG responses.	0.9	
6/21/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.0	
6/21/2021	EH	Reviewing and creating access link for opposing counsel re call pendant document production.	0.4	
6/22/2021	GCG	Review Judge Beeler order regarding motion to compel response to interrogatory.	0.1	
6/22/2021	GCG	Email JSY - team regarding class member declarations.	0.1	
6/22/2021	BBK	Conferring w/ RBGG team re correcting index of exhibits for 30b6 Topic 10 deposition transcript.	0.1	
6/22/2021	BBK	Conferring w/ RBGG team re standardizing format for class member declarations.	0.2	
6/22/2021	BBK	Conferring w/ co-counsel re 30b6 Topic 2 deposition.	0.1	
6/22/2021	BBK	Reviewing docs and drafting class decls o/b/o daughters of BD Oceanside and BD Carmel Valley former residents.	3.0	
6/22/2021	BBK	Conferring w/ JSY/AX re class member declarations.	0.1	
6/22/2021	BBK	Reviewing Court Order denying MTC answer to interrogatory re alterations to BD facilities; conferring w/ JSY and AX re same.	0.1	
6/22/2021	JSY	Emails and calls re access to class list.	0.2	
6/22/2021	JSY	Emails and conf. re declarations; edit same.	0.5	
6/22/2021	AX	Email correspondence w/ team re: issues with finalizing class member declarations.	0.2	
6/22/2021	AX	Email correspondence w/ RS re Emeritus residency agreements.	0.4	
6/22/2021	AX	Review class member documentation and draft declarations.	2.5	
6/22/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.3	
6/22/2021	EH	Revising three class rep declarations, incorporating information from ROG responses.	2.8	
6/23/2021	GCG	Conference with MWB regarding mediation.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/23/2021	GCG	Conference with AX regarding class member declaration gathering.	0.1	
6/23/2021	GCG	Conference with CG and email from JM regarding expert reports.	0.1	
6/23/2021	MWB	Telephone call with GCG regarding Mediation.	0.3	
6/23/2021	BBK	Conferring w/ JSY/AX re declaration-gathering.	0.1	
6/23/2021	BBK	Conferring w/ JSY/AX re strategy for doc analysis on 30b6 deposition on training.	0.1	
6/23/2021	BBK	Reviewing AX-D. Marks comm'ns re analysis of pendant data.	0.1	
6/23/2021	BBK	Meeting w/ JSY and AX re prep for 30b6 depo on training and declaration-gathering.	0.8	
6/23/2021	BBK	Drafting class member declarations (including analysis of intake notes and Relativity docs).	2.8	
6/23/2021	JSY	T/C with BBK and AX re Topic 12 depo prep and declarations.	0.9	
6/23/2021	AX	Review lists of class members to identify additional outreach candidates for RBGG team and communication with team re same.	0.5	
6/23/2021	AX	Email correspondence w/ team re pendant response data.	0.2	
6/23/2021	AX	Call with BBK and JSY re preparation for strategies for PMK depositions.	1.0	
6/23/2021	AX	Review class member documentation and draft declarations and make outreach calls.	4.2	
6/23/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.8	
6/23/2021	EH	Left voice mails for 2 potential class members re class cert motion.	0.3	
6/24/2021	GCG	Conference with JSY and CG and emails BBK - team regarding gathering declarations and expert reports.	0.1	
6/24/2021	GCG	Conference with KES regarding ADA deposition and class member declaration.	0.1	
6/24/2021	BBK	Reviewing JSY-AX-R.Steyer comm'ns re plan for outreach to class members.	0.1	
6/24/2021	BBK	Conferring w/ EH re doc analysis for Issue Registers of resident complaints.	0.2	
6/24/2021	BBK	Reviewing GW update re 30b6 deposition on ADA; conferring w/ team re time on record so far during 30b6 depositions.	0.1	
6/24/2021	BBK	Drafting class cert declarations.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/24/2021	BBK	Drafting/sending report to RBGG team recommending request that Ds supplement production of Issue Register of resident complaints.	0.2	
6/24/2021	BBK	Preparing for call w/ potential declarant (daughter of former BD Oceanside resident).	0.2	
6/24/2021	BBK	Left VM for potential declarant (daughter of former BD Oceanside resident).	0.1	
6/24/2021	BBK	Prep for call w/ potential declarant (daughter of former BD Carmel Valley residents).	0.2	
6/24/2021	BBK	Phone call w/ daughter of former BD Carmel Valley residents re cert decl.	1.2	
6/24/2021	BBK	Conferring w/ GCG re status of declaration-gathering of class members and former employees.	0.1	
6/24/2021	BBK	Conferring w/ investigator re: outreach to witnesses.	0.1	
6/24/2021	BBK	Emailing co-counsel to recommend requesting supplementation w/ updated Issue Registry of resident complaints and drafting proposed email to opposing counsel doing same.	0.6	
6/24/2021	BBK	Conferring w/ co-counsel re: supplementation request and M&C on 6/25 re other outstanding discovery requests.	0.1	
6/24/2021	BBK	Reviewing JSY update re FU call w/ potential declarant; conferring w/ JSY and AX re same.	0.2	
6/24/2021	BBK	Reviewing report on outreach by investigation and updating RBGG team re same.	0.2	
6/24/2021	JSY	T/C with former employee; emails with team re same; edit decl. re same.	1.4	
6/24/2021	JSY	CM declaration calls; edit same; emails and conf with team re same.	1.8	
6/24/2021	AX	Prepare for and attend call with putative class member re: finalizing declaration.	2.5	
6/24/2021	AX	Email correspondence w/ RS and Schneider Wallace team re: supplemental class list and related issues.	0.5	
6/24/2021	EH	Call with potential class member re declaration in support of motion for class cert.	0.5	
6/24/2021	EH	Analysis of issue registers/complaints produced by defendants (1.3); summarized same for BBK (.3).	1.5	
6/24/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.0	
6/25/2021	GCG	Meet with SW team to plan class certification motion.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/25/2021	GCG	Meet with RBGG team to discuss declaration gathering.	0.3	
6/25/2021	BBK	Reviewing MJ agenda for 6/25 meet and confer w/ Ds; reviewing AX update re pendant data production.	0.1	
6/25/2021	BBK	Drafting/sending email to opposing counsel request supplemental production of Issue Register of resident and family complaints.	0.2	
6/25/2021	BBK	Conferring w/ RBGG re revising/finalizing declarations of named Plaintiffs.	0.1	
6/25/2021	BBK	Meeting w/ co-counsel re class cert strategy/tasks.	0.6	
6/25/2021	BBK	Meeting w/ RBGG team re class cert strategy/tasks.	0.3	
6/25/2021	BBK	Conferring w/ investigator re progress.	0.2	
6/25/2021	BBK	Reviewing AX report re 6/25 meet and confer w/ Ds.	0.1	
6/25/2021	BBK	Drafting revisions to BB declaration based on 6/24 interview.	2.0	
6/25/2021	BBK	Conferring w/ RBGG team re declaration-gathering.	0.1	
6/25/2021	JSY	Call with JA re declaration.	0.7	
6/25/2021	JSY	T/C with CM re declaration.	0.6	
6/25/2021	JSY	Team meeting re class cert tasks.	0.7	
6/25/2021	JSY	Review documents for Topic 12 depo.	0.5	
6/25/2021	JSY	Draft and edit CM declarations; emails re same.	2.4	
6/25/2021	AX	Draft class member declaration and review supporting documentation.	2.2	
6/25/2021	AX	Team strategy meeting re document production, discovery, and class certification issues.	1.3	
6/25/2021	AX	Prepare for and attend meet and confer call with MJ and Brookdale opposing counsel.	1.5	
6/25/2021	AX	Follow up call with MJ and GW re meet and confer call.	0.5	
6/25/2021	AX	Draft email summary and analysis of meet and confer calls.	0.4	
6/25/2021	EH	Call with potential class member re declaration ISO motion for class cert; finalized declaration on call.	1.7	
6/25/2021	EH	Revised three declarations in support of motion for class cert.	1.8	
6/25/2021	EH	Conference with team re motion for class cert.	1.0	
6/25/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/25/2021	KES	Zoom meetings with co-counsel and team re doc review and class cert prep.	1.4	
6/25/2021	KES	Revise class member declaration and review PSP docs re same; email to team re same.	2.0	
6/26/2021	JSY	Edit CM declaration; emails re same.	0.3	
6/28/2021	BBK	Reviewing email from opposing counsel refusing to make supplemental production of updated Issue Register of resident complaints.	0.1	
6/28/2021	BBK	Brainstorming next steps ILO Ds' refusal to supplement production of Issue Register of resident complaints.	0.3	
6/28/2021	BBK	Drafting/sending recommendation to co-counsel re next steps IILO Ds' refusal to supplement production of Issue Register of resident complaints.	0.6	
6/28/2021	BBK	Reviewing report from investigator re progress.	0.2	
6/28/2021	BBK	Reviewing/approving invoice from investigator.	0.1	
6/28/2021	BBK	Drafting/sending recommendation to RBGG team re plan for investigation.	0.2	
6/28/2021	BBK	Reviewing/revising class decl from daughter of BD Carmel Valley residents in advance of call to finalize.	0.7	
6/28/2021	BBK	Conferring w/ JSY re outreach to former employee.	0.1	
6/28/2021	BBK	Conferring w/ daughter of former BD Oceanside resident re: declaration.	0.2	
6/28/2021	BBK	Revising declaration of daughter of former BD Oceanside resident.	0.2	
6/28/2021	BBK	Conferring w/ JSY and AX re declaration-gathering.	0.1	
6/28/2021	BBK	Prep for call w/ daughter of former BD Carmel Valley residents.	0.1	
6/28/2021	BBK	Conferring by phone w/ daughter of former BD Carmel Valley residents re declaration.	1.1	
6/28/2021	BBK	Preparing/sending via DocuSign final draft decl of daughter of former BD Carmel Valley residents.	0.3	
6/28/2021	BBK	Conferring w/ decl of daughter of former BD Carmel Valley residents re addition to draft decl.	0.1	
6/28/2021	BBK	Revising decl of daughter of former BD Carmel Valley residents to incorporate proposed addition and re-sending via DocuSign.	0.3	
6/28/2021	BBK	Emailing w/ investigator.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/28/2021	BBK	Conferring w/ JSY and AX re residency agreements for AL, MC and CCRC.	0.3	
6/28/2021	BBK	Reviewing investigator memo.	0.1	
6/28/2021	BBK	Emailing w/ investigator.	0.1	
6/28/2021	JSY	Prep for training depo.	2.1	
6/28/2021	JSY	Call with CM re declaration.	1.0	
6/28/2021	JSY	Emails re CM declarations.	0.2	
6/28/2021	JSY	Draft and edit CM declarations.	3.0	
6/28/2021	AX	Email correspondence w/ team re CCRS agreement.	0.5	
6/28/2021	AX	Review documentation re: class certification declaration.	1.5	
6/28/2021	AX	Draft class member declaration.	1.8	
6/28/2021	EH	Revising and sending via docusign declaration in support of motion for class cert.	1.2	
6/28/2021	EH	Call with potential class member re declaration in support of motion for class cert.	1.9	
6/28/2021	EH	Revising declaration in support of class cert re parent's experiences at Brookdale Alhambra.	0.9	
6/28/2021	EH	Revisions to declaration in support of motion for class cert re Brookdale Oceanside and San Marcos.	1.1	
6/28/2021	EH	Call with potential class member re declaration in support of motion for class cert.	0.9	
6/28/2021	KES	Email team re 6/30 depo.	0.1	
6/28/2021	KES	Download video transcripts for Topics 10 and 16 and upload to TextMap.	0.4	
6/28/2021	KES	Arrange for payment of investigator invoice.	0.1	
6/28/2021	KES	Check DSS site and review Algarme complaint report.	0.2	
6/28/2021	KES	Review and finalize draft class member declaration and send for signature through Docusign.	0.8	
6/29/2021	GCG	Emails to EH and team re class member declaration gathering.	0.2	
6/29/2021	BBK	Conferring w/ MJ and GW re moving to compel updated Issue Register of resident complaints.	0.1	
6/29/2021	BBK	Reviewing MJ report re status of discovery tasks.	0.1	
6/29/2021	BBK	Conferring w/ AX and co-counsel re CCRC residency agreements.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/29/2021	BBK	Reviewing prior court orders in prep for joint letter brief re complaints.	0.3	
6/29/2021	BBK	Drafting follow-up email to opposing counsel re M&C on updated Issue Register of resident complaints.	0.3	
6/29/2021	BBK	Analyzing docs to fact check class decls.	1.0	
6/29/2021	BBK	Conferring w/ JSY and AX re declaration-gathering.	0.3	
6/29/2021	BBK	Reviewing EH and KES updates re declaration-gathering.	0.1	
6/29/2021	BBK	Conferring w/ RGG team re signed decl from daughter of BD Carmel Valley residents.	0.1	
6/29/2021	BBK	Conferring w/ daughter of BD Carmel Valley residents re declaration.	0.1	
6/29/2021	JSY	Conf. w/ GAB re deposition prep project.	0.3	
6/29/2021	JSY	Draft and edit CM declarations; emails re same.	1.6	
6/29/2021	JSY	Prep for Topic 12 depo; doc review re same; conf. w/ KES re same.	2.3	
6/29/2021	AX	Draft class member declarations and review related documentation.	2.5	
6/29/2021	AX	Email correspondence w/ team re residency agreements.	0.5	
6/29/2021	EH	Call with potential class member re declaration in support of motion for class cert.	1.0	
6/29/2021	EH	Revised three class member declarations in support of motion for class cert.	1.4	
6/29/2021	EH	Revised declaration of wife of resident at Brookdale Fountaingrove (1.5); analyzed client documents re same (.6).	2.1	
6/29/2021	EH	Correspondence with team re declaration of potential class member in support of motion for class cert.	0.4	
6/29/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	0.8	
6/29/2021	GAB	Meet with JSY re: deposition preparation.	0.6	
6/30/2021	BBK	Tracking outreach for declaration-gathering on Sharepoint.	0.3	
6/30/2021	BBK	Conferring w/ JSY re declaration-gathering.	0.2	
6/30/2021	BBK	Revising draft class declarations.	1.5	
6/30/2021	BBK	Prep for call w/ potential declarant (daughter of BD Irvine former resident).	0.2	
6/30/2021	BBK	Phone call w/ potential declarant (daughter of BD Irvine former resident).	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/30/2021	BBK	Conferring w/ R. Steyer re FU w/ daughter of former BD Irvine resident.	0.2	
6/30/2021	JSY	Emails re class member declarations.	0.2	
6/30/2021	JSY	Document review for Topic 12 deposition; draft outline re same.	4.0	
6/30/2021	EH	Drafting memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	3.1	
6/30/2021	EH	Call with potential class member re declaration in support of motion for class cert.	0.9	
7/1/2021	GCG	Conf w/ BBK re declaration drafting for class cert motion.	0.2	
7/1/2021	BBK	Conferring by phone w/ GCG re status of class cert projects.	0.2	
7/1/2021	BBK	Drafting/sending request for invoice from investigator.	0.1	
7/1/2021	BBK	Conferring w/ R. Steyer re FU w/ daughter of former resident of BD Irvine.	0.1	
7/1/2021	BBK	Conferring w/ RBGG litigation team re 7/2 co-counsel meeting.	0.1	
7/1/2021	BBK	Preparing for FU w/ daughter of BD Oceanside resident.	0.2	
7/1/2021	BBK	Follow-up w/ daughter of BD Oceanside resident.	0.2	
7/1/2021	BBK	Analyzing reports from investigators to ID any other former BD employees for FU.	0.5	
7/1/2021	BBK	Reviewing EH/GW comm'ns re draft class decl from wife of former BD Fountaingrove resident.	0.1	
7/1/2021	BBK	Reviewing MJ meet and confer email to Ds re outstanding PSS data.	0.1	
7/1/2021	JSY	Review documents re training topic; draft outline re same.	2.0	
7/1/2021	EH	Call with potential class member re experiences at Brookdale Fountaingrove and declaration in support of motion for class cert.	1.2	
7/1/2021	EH	Memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	1.3	
7/1/2021	KES	Email team re Zoom call.	0.1	
7/1/2021	GAB	Read third amended complaint.	1.0	
7/2/2021	BBK	Reviewing/approving invoice from investigator.	0.1	
7/2/2021	BBK	(Billing Judgment) Conferring w/ investigator re payment of invoice.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
7/2/2021	BBK	Conferring w/ JSY re declaration-gathering and meeting w/ co-counsel.	0.1	
7/2/2021	BBK	Reviewing JSY report to RBGG team re 7/2 co-counsel meeting.	0.1	
7/2/2021	JSY	Calls and emails re class member declarations; emails re same.	0.3	
7/2/2021	JSY	Team meeting re doc review and class cert prep.	1.0	
7/2/2021	JSY	Call with GW and MTJ re training depo.	0.5	
7/2/2021	JSY	Prep for training depo; review docs re same; emails re same.	2.0	
7/2/2021	EH	Revising class member declaration ISO motion for class cert.	0.6	
7/2/2021	EH	Call with co-counsel re class cert declaration, PMK depositions, etc.	0.6	
7/2/2021	EH	Memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	2.1	
7/2/2021	KES	Participate in Zoom call with co-counsel, review and circulate notes.	1.4	
7/2/2021	KES	Follow up with co-counsel and court reporter re deposition transcripts.	1.3	
7/2/2021	GAB	Read third amended complaint.	1.7	
7/2/2021	GAB	Review documents for Topic 12 depo.	6.5	
7/5/2021	BBK	Conferring w/ daughter of former BD resident re scheduling PC.	0.1	
7/6/2021	GCG	Emails to JSY and team re declaration gathering.	0.2	
7/6/2021	BBK	Emailing w/ daughter of BD Oceanside declarant re call.	0.2	
7/6/2021	BBK	Reviewing MJ letter to Ds re scope of upcoming 30b6 Topic 5 deposition.	0.1	
7/6/2021	BBK	Preparing for call w/ daughter of former BD Oceanside resident.	0.2	
7/6/2021	KES	Download and circulate depo transcript and video depo; upload to TextMap.	1.0	
7/6/2021	GAB	Review documents in preparation for Topic 12 depo.	6.8	
7/7/2021	BBK	Conferring w/ RBGG team and R. Steyer re declaration-gathering from class members.	0.3	
7/7/2021	BBK	Reviewing decl obtained by EH from daughter of former BD resident.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 436

SERVICES

Date	Person	Description of Services	Hours	Discount
7/7/2021	BBK	Preparing for interview w/ daughter of former BD Oceanside resident.	0.3	
7/7/2021	BBK	Interviewing daughter of former BD Oceanside resident.	0.8	
7/7/2021	BBK	Updating RBGG team re interview w/ daughter of former BD Oceanside resident.	0.1	
7/7/2021	BBK	Conferring w/ KES re declaration-gathering.	0.1	
7/7/2021	BBK	Drafting/sending FU email to Ds requesting M&C on request to supplement chart of resident complaints.	0.2	
7/7/2021	JSY	Emails re JA declaration.	0.1	
7/7/2021	JSY	Review documents re training; draft depo outline re same.	6.2	
7/7/2021	EH	call with relative of former resident at Brookdale Mirage Inn to go over declaration ISO motion for class cert.	1.2	
7/7/2021	EH	Revised declaration for relative of former resident at Brookdale Mirage Inn.	0.7	
7/7/2021	EH	Research and outreach to potential declarants ISO motion for class cert.	0.4	
7/7/2021	EH	Memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	3.4	
7/7/2021	KES	Call with putative class member to review draft declaration and revise same; review pending draft declarations, gather related materials and email team re follow up.	2.5	
7/7/2021	KES	Review additional documents for PMK depos.	1.5	
7/7/2021	GAB	Review documents to prep for Topic 12 depo.	6.5	
7/8/2021	GCG	Conf w/ JSY and emails to team re declaration gathering.	0.1	
7/8/2021	BBK	Drafting/sending to GCG report on status of BD projects for class cert motion.	0.2	
7/8/2021	BBK	Conferring w/ litigation team re Ds' request to postpone 30b6 Topic 12 deposition.	0.1	
7/8/2021	BBK	Conferring w/ RBGG team re declaration-gathering and progress.	0.3	
7/8/2021	BBK	Following-up w/ daughter of former BD Irvine resident re potential declaration.	0.2	
7/8/2021	BBK	Updating tracking chart re BBK outreach to potential declarants.	0.1	
7/8/2021	BBK	Meeting w/ JSY re prep for class cert.	0.2	
7/8/2021	BBK	Reviewing/revising draft decl obo son of former BD Anaheim Hills resident in prep for FU call.	1.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/8/2021	BBK	Conferring w/ EH re plan for BBK decl ISO class cert motion.	0.1	
7/8/2021	BBK	Reviewing MJ-opposing counsel emails re meeting and conferring over disputes.	0.1	
7/8/2021	BBK	Drafting/sending proposal to MJ re request to M&C w/ Ds on 7/9 re supplemental production of Issue Register of complaints.	0.3	
7/8/2021	JSY	Emails re training topic depo; review documents re same; draft outline re same.	2.2	
7/8/2021	JSY	Draft and edit class member declarations; emails re same.	3.0	
7/8/2021	EH	Memo to file re analysis of deponent testimony concerning 306b deposition topic 12.	4.5	
7/8/2021	EH	Revising declaration for relative of former resident at Brookdale Mirage Inn.	0.4	
7/8/2021	KES	Summarize additional topic specific training docs for upcoming depo.	1.0	
7/8/2021	KES	Reschedule depositions.	0.5	
7/8/2021	GAB	Review documents in preparation for Topic 12 depo.	1.5	
7/9/2021	GCG	Meet w/ SW and then RBGG team to plan class certification motion.	0.9	
7/9/2021	GCG	Emails to GW and experts re same and ADA reports and "readily achievable" standard.	0.2	
7/9/2021	BBK	Conferring w/ MJ re meeting and conferring w/ Ds re request to supplement Issue Register.	0.1	
7/9/2021	BBK	Prep for M&C w/ Ds re request to supplement Issue Register.	0.4	
7/9/2021	BBK	Telephonic M&C w/ Ds re request to supplement Issue Register and scope of 30b6 deposition on staffing.	0.8	
7/9/2021	BBK	Conferring w/ EH re declaration-gathering progress.	0.1	
7/9/2021	BBK	Drafting/sending report to RBGG team re M&C w/ Ds.	0.3	
7/9/2021	BBK	Meeting w/ co-counsel re class cert prep.	0.6	
7/9/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.2	
7/9/2021	BBK	Planning revisions to exhibits to BBK decl ISO class cert.	0.2	
7/9/2021	BBK	Conferring w/ JSY/AX re outreach to former EDs.	0.1	
7/9/2021	BBK	Conferring w/ GW/MJ re meeting w/ D. Marks team re staffing analysis and DSS complaints.	0.1	
7/9/2021	BBK	Meeting w/ J. Thornton/MJ/GW re staffing analysis and DSS complaints.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/9/2021	BBK	Drafting/sending assignment to EH re plan for preparing DSS materials for BBK decl and staffing expert.	0.2	
7/9/2021	BBK	Conferring w/ JSY/AX re plan for gathering class representative declarations.	0.1	
7/9/2021	BBK	Conferring w/ daughter of former BD Oceanside resident re finalizing declaration.	0.2	
7/9/2021	BBK	Conferring w/ litigation team re prep for 30b6 deposition on training.	0.1	
7/9/2021	BBK	Conferring w/ litigation team re filing checklist for class cert motion.	0.1	
7/9/2021	JSY	Draft and edit declaration of ML; conf. w/ ML re same; emails re same.	1.5	
7/9/2021	JSY	Draft filing checklist; emails re same.	0.5	
7/9/2021	JSY	Team meeting.	0.8	
7/9/2021	JSY	Draft training depo outline; review documents re same; emails re same.	3.3	
7/9/2021	AX	Call with HF re class member declaration and preparation for call.	1.0	
7/9/2021	AX	Team strategy meeting regarding class certification case tasks, updates on discovery.	1.5	
7/9/2021	AX	Prepare for call with class member, including review prior memos and search for residency agreement, other documents.	0.6	
7/9/2021	AX	Call with CJ re experiences at Brookdale San Pablo.	0.8	
7/9/2021	AX	Call with JI re class certification declaration.	1.0	
7/9/2021	AX	Prepare for call with JI.	0.5	
7/9/2021	EH	Conference with team re motion for class cert and outstanding discovery requests.	0.9	
7/9/2021	EH	Analyzing deponent testimony re service alignment, customization, norms, and benchmark.	5.8	
7/9/2021	EH	Drafting memo to file re deponent testimony around service alignment, customization, norms and benchmarks.	2.3	
7/9/2021	KES	Zoom meeting with co-counsel.	1.0	
7/9/2021	KES	Further revisions to putative class member declaration and email to team re same.	1.0	
7/9/2021	LHW	Supplemental Conflicts Check re experts.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/10/2021	GCG	Email to GW and team re expert declarations and deposition preparation.	0.1	
7/10/2021	EH	Analyzing deponent testimony and compiling citations re service alignment, benchmarks, norms, customization, etc.	4.4	
7/11/2021	BBK	Reviewing comm'ns w/ litigation team re prep for 30b6 deposition on staffing/service alignment.	0.1	
7/12/2021	GCG	Conf w/ KES re putative class member declaration.	0.1	
7/12/2021	BBK	Meeting w/ EH to plan analysis of DSS complaints and preparation of exhibits re same.	0.4	
7/12/2021	BBK	Preparing for call w/ son of former BD Anaheim Hills resident re declaration.	0.2	
7/12/2021	BBK	Conferring w/ son of former BD Anaheim Hills resident.	0.1	
7/12/2021	BBK	Conferring w/ JSY and AX re outreach to putative class members.	0.1	
7/12/2021	BBK	Conferring w/ co-counsel re tracking contacts w/ putative class members.	0.1	
7/12/2021	BBK	Revising spreadsheet of relevant DSS citations against BD facilities.	0.4	
7/12/2021	BBK	Analyzing status of outreach to former BD Eds in prep for meeting w/ JSY and AX.	0.2	
7/12/2021	BBK	Meeting w/ JSY and AX re prep for class cert.	0.7	
7/12/2021	BBK	Conferring w/ JSY re outreach to former ED of BD San Ramon.	0.1	
7/12/2021	BBK	Revising draft decl by daughter of former BD Oceanside resident based on additional info provided.	0.6	
7/12/2021	BBK	Conferring by phone w/ son of former BD Anaheim Hills resident re declaration.	0.9	
7/12/2021	JSY	Meeting with BBK and AX re class member and former employee declarations and other case tasks.	0.8	
7/12/2021	JSY	Review training documents.	1.0	
7/12/2021	JSY	Calls to class member and draft and edit declarations; emails and conf. re same.	3.1	
7/12/2021	AX	Strategy meeting with JSY, BBK re case tasks and class certification motion.	0.5	
7/12/2021	AX	Confer w/ JSY re class member declarations.	0.3	
7/12/2021	AX	Review email correspondence from team re discovery issues.	0.2	
7/12/2021	AX	Review class member documents relevant to declarations.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/12/2021	EH	Conference with BBK re DSS complaints analysis for expert report.	0.4	
7/12/2021	EH	Review documents for class cert.	0.5	
7/12/2021	EH	Revising shared database for new signed class member declarations.	0.2	
7/12/2021	KES	Confer co-counsel re depo transcripts and exhibits.	0.8	
7/13/2021	BBK	Reviewing JSY summary of status of RBGG team tasks ISO class cert motion.	0.1	
7/13/2021	BBK	Drafting/sending additional info re status of RBGG team tasks ISO class cert motion.	0.2	
7/13/2021	BBK	Conferring w/ co-counsel and RBGG team re class declarations where Ds did not produce residency agreements.	0.3	
7/13/2021	BBK	Conferring w/ JSY and AX re declaration-gathering from class members.	0.2	
7/13/2021	BBK	Conferring w/ JSY, AX and R. Steyer re tracking class contacts.	0.1	
7/13/2021	BBK	Revising draft decl for daughter of former resident of BD Oceanside based on additional info provided by her.	1.0	
7/13/2021	BBK	Conferring by phone w/ daughter of former resident of BD Oceanside re finalizing decl.	0.9	
7/13/2021	BBK	Attending to sending final decl to daughter of former resident of BD Oceanside via DocuSign.	0.2	
7/13/2021	BBK	Reviewing JSY and AX reports re outreach to former BD Executive Directors.	0.1	
7/13/2021	JSY	Finalize ML declaration and exhibit; emails re same.	0.5	
7/13/2021	JSY	Calls and emails re CM declarations and former employee declarations.	0.8	
7/13/2021	JSY	Review training documents; draft depo outline re same.	1.0	
7/13/2021	JSY	Emails re completed class member declaration.	0.1	
7/13/2021	AX	Email communication with team re residency agreements and related review of court orders and documents.	1.5	
7/13/2021	AX	Outreach to former Brookdale Eds and draft memo to file.	0.7	
7/13/2021	AX	Email and phone correspondence w/ Schneider Wallace tech team re Sharepoint issues.	0.8	
7/13/2021	AX	Email communication with team re class certification strategy issues.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/13/2021	AX	Review class member declaration documentation and draft declaration.	2.0	
7/13/2021	AX	Email communication with potential declarants.	0.3	
7/13/2021	EH	Compile and organize exhibits for DSS complaints analysis.	3.7	
7/13/2021	KES	Follow up re upcoming depos.	0.2	
7/13/2021	KES	Additional revisions to class member declaration.	1.0	
7/14/2021	JSY	Class member calls.	0.7	
7/14/2021	JSY	Draft declarations.	0.7	
7/14/2021	JSY	Emails and calls re same.	0.9	
7/14/2021	BBK	Drafting/sending update to GCG re status of class cert tasks.	0.1	
7/14/2021	BBK	Drafting memo re outreach to former Brookdale EDs.	0.5	
7/14/2021	BBK	Updating draft decl obo son of BD Anaheim Hills resident to incorporate info from T. Close re Addendum to Residency Agreement.	0.2	
7/14/2021	BBK	Conferring w/ JSY re gathering class decls.	0.1	
7/14/2021	BBK	Conferring w/ JSY and AX re outreach to class members.	0.2	
7/14/2021	BBK	Conferring w/ JSY and AX re tracking class contacts.	0.1	
7/14/2021	BBK	Drafting class rep declaration by P. Lindstrom.	3.1	
7/14/2021	BBK	Conferring w/ JSY re commenting on P. Lindstrom class rep decl.	0.1	
7/14/2021	JSY	Draft training depo outline.	1.0	
7/14/2021	AX	Draft HF class member declaration.	1.5	
7/14/2021	EH	Conference with JSY re Brookdale class cert.	0.2	
7/14/2021	EH	Revising three class member declarations ISO motion for class cert.	0.7	
7/14/2021	EH	Compiled and organized exhibits for DSS complaints analysis.	2.1	
7/14/2021	FGL	(Billing Judgment) Email from and confer with AX re Fockler declaration.	0.0	0.1
7/15/2021	GCG	Confs w/ GW and AX re fact section of class cert brief.	0.2	
7/15/2021	GCG	Email to team re same and re declaration gathering.	0.1	
7/15/2021	JSY	Draft training depo outline.	1.0	
7/15/2021	JSY	Review documents re same.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/15/2021	JSY	Edit Lindstrom declaration.	0.5	
7/15/2021	JSY	Calls with class members.	1.0	
7/15/2021	JSY	Draft declarations re same.	1.0	
7/15/2021	JSY	Emails re same.	0.1	
7/15/2021	BBK	Drafting follow-up email to Ds re meeting and conferring on request for supp production of Issue Register of resident complaints.	0.3	
7/15/2021	BBK	Conferring w/ MJ re plan for follow-up w/ Ds re scheduling M&C on request for supp production of Issue Register of resident complaints.	0.1	
7/15/2021	BBK	Drafting Ps' portion of joint letter brief on request for supp prod of Issue Register of resident complaints.	1.6	
7/15/2021	BBK	Reviewing Ds' compromise proposal on request for supp prod of Issue Register and drafting/sending recommendation to co-counsel re same.	0.4	
7/15/2021	BBK	Conferring w/ RBGG team re declaration-gathering.	0.2	
7/15/2021	BBK	Conferring w/ JSY/AX/EH/LM re fielding calls from class members.	0.2	
7/15/2021	BBK	Conferring w/ JSY & AX re B. Jestrabek-Hart class rep decl.	0.1	
7/15/2021	BBK	Conferring w/ GW re preparing DSS citations and spreadsheet for analysis by C Flores.	0.2	
7/15/2021	BBK	Conferring w/ EH re preparing DSS citations and spreadsheet for analysis by C Flores.	0.3	
7/15/2021	BBK	Conferring w/ JSY and AX re DSS citations and spreadsheet for analysis by C Flores.	0.1	
7/15/2021	BBK	Conferring w/ JSY and AX re class cert motion preparation.	0.2	
7/15/2021	BBK	Conferring w/ opposing counsel re agreement to compromise on production of updated Issue Register.	0.1	
7/15/2021	BBK	Conferring w/ JSY re draft Lindstrom class rep decl.	0.1	
7/15/2021	BBK	Revising Lindstrom class rep decl based on JSY comments.	0.3	
7/15/2021	BBK	Drafting/sending request to co-counsel for comments on Lindstrom class rep decl.	0.1	
7/15/2021	BBK	Drafting report to GCG re status of class cert projects.	0.1	
7/15/2021	AX	Call with LP re class member declaration and related follow up.	0.8	
7/15/2021	AX	Call with GCG re class certification tasks.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/15/2021	AX	Correspondence w/ team re updates on class certification declaration gathering process.	0.3	
7/15/2021	AX	Email correspondence w/ HF re class member declaration and review of same.	0.3	
7/15/2021	AX	Review correspondence w/ team re production of issue registers.	0.2	
7/15/2021	AX	Review team correspondence re draft facility reports.	0.1	
7/15/2021	AX	Draft class member declarations.	1.8	
7/15/2021	AX	Review Pat Lindstrom draft declaration and related team correspondence.	0.4	
7/15/2021	EH	Conference with BBK re DSS complaints analysis.	0.3	
7/15/2021	EH	Compiled and organized exhibits for DSS complaints analysis.	3.8	
7/15/2021	FGL	(Billing Judgment) Format/finalize declaration.	0.0	0.3
7/16/2021	GCG	Participate in meeting to plan class cert motion.	1.0	
7/16/2021	GCG	Follow up conference w/ GW, MJ and CW re class member outreach.	0.5	
7/16/2021	GCG	Conf w/ and emails to RBGG team re same.	0.5	
7/16/2021	BBK	Reviewing comments by GW and MJ on draft Lindstrom class rep decl and conferring w/ MJ re same.	0.3	
7/16/2021	BBK	Conferring w/ RBGG team re revisions needed for class rep declarations.	0.1	
7/16/2021	BBK	Reviewing AX report re analysis of BD pendant data and comm'ns w/ D. Marks re same.	0.1	
7/16/2021	BBK	Reviewing proposed agenda for 7/16 co-counsel meeting and updates from JSY and co-counsel re status of projects.	0.1	
7/16/2021	BBK	Conferring w/ daughter of BD Oceanside former resident re signing decl.	0.1	
7/16/2021	BBK	Meeting w/ co-counsel re class cert prep.	1.1	
7/16/2021	BBK	Meeting w/ RBGG litigation team re class cert prep.	0.5	
7/16/2021	BBK	Emailing w/ co-counsel re class declarations.	0.1	
7/16/2021	BBK	Conferring w/ RBGG litigation team re outreach to class contacts.	0.2	
7/16/2021	BBK	Conferring w/ R. Steyer re Sharepoint access for tracking class contacts.	0.1	
7/16/2021	BBK	Reviewing co-counsel emails re: docs needed for damages and emergency evacuation experts.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/16/2021	BBK	Tracking contacts w/ class members.	0.2	
7/16/2021	BBK	Conferring w/ RBGG team re revised template and language for class declarations.	0.2	
7/16/2021	BBK	Meeting w/ Schneider Wallace IT staff re: sharepoint access for tracking class contacts.	0.3	
7/16/2021	BBK	Revising draft Lindstrom class rep declaration to incorporate MJ and GW comments (including fact research for same).	0.9	
7/16/2021	BBK	Conferring w/ MJ re further revisions to draft Lindstrom class rep decl.	0.1	
7/16/2021	BBK	Reviewing co-counsel and opposing counsel emails re: joint discovery letter briefs and other discovery disputes.	0.1	
7/16/2021	BBK	Emailing P. Lindstrom re class rep decl.	0.1	
7/16/2021	BBK	Following-up w/ son of former BD Anaheim Hills resident re: class decl.	0.1	
7/16/2021	BBK	Conferring w/ RBGG team re outreach to putative class members in advance of cert motion.	0.2	
7/16/2021	JSY	Team meeting.	1.3	
7/16/2021	JSY	Class member calls; emails re same.	0.3	
7/16/2021	JSY	Resend ML and JA declarations for signature.	0.2	
7/16/2021	JSY	Draft training depo outline; review documents re same.	2.8	
7/16/2021	JSY	Emails re outreach.	0.1	
7/16/2021	AX	Review pendant response data and email correspondence w/ David Marks and Jim Thornton re same.	1.5	
7/16/2021	AX	Team strategy meeting with RBGG and co-counsel team re document review issues, depositions, and class cert tasks.	2.2	
7/16/2021	AX	Email correspondence w/ RB, TC re damages expert documents.	0.2	
7/16/2021	AX	Follow up with IT contact re Sharepoint troubleshooting.	0.4	
7/16/2021	AX	Draft BJH declaration.	0.7	
7/16/2021	AX	Email correspondence re class, member outreach.	0.5	
7/16/2021	EH	Conference with co-counsel re outstanding tasks for motion to class cert, declaration gathering, discovery, etc.	1.2	
7/16/2021	EH	Analysis of DSS complaints against Brookdale facilities for expert & BBK decl.	6.0	
7/16/2021	KES	Follow up re expedited depo transcripts.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 445

SERVICES

Date	Person	Description of Services	Hours	Discount
7/16/2021	KES	Zoom with co-counsel.	1.0	
7/16/2021	KES	Emails with team re additional potential declarant outreach and review past communications re same.	1.0	
7/17/2021	BBK	Conferring w/ P. Lindstrom re class rep decl.	0.2	
7/18/2021	GCG	Texts w/ JSY and emails to GW and team re putative class member declarations.	0.2	
7/18/2021	BBK	Conferring w/ team re GW comments on RBGG class member declarations.	0.2	
7/18/2021	BBK	Reviewing AX's draft B. Jestrabek-Hart class rep decls and GW comments thereon.	0.1	
7/18/2021	JSY	Emails re class member declarations; review same.	0.2	
7/18/2021	AX	Correspondence w/ team re class member declaration process and template issues.	0.5	
7/18/2021	EH	Analyzing DSS complaints and revising chart re same for expert and BBK decl ISO motion for class cert.	5.5	
7/19/2021	BBK	Conferring w/ RBGG team re class member declarations.	0.1	
7/19/2021	BBK	Conferring w/ co-counsel and RBGG team re media outreach re class cert motion.	0.3	
7/19/2021	BBK	Conferring w/ AX re outreach to J. Carlson.	0.1	
7/19/2021	BBK	Drafting revised class decl for son of former BD Anaheim Hills resident.	2.8	
7/19/2021	BBK	Conferring by phone w/ J. Carlson re class rep decl.	0.2	
7/19/2021	BBK	Updating co-counsel and RBGG team re call w/ J. Carlson.	0.1	
7/19/2021	BBK	Conferring w/ AX re potential class decl from son of former BD resident.	0.1	
7/19/2021	BBK	Conferring w/ EH re status of analysis and compilation of DSS citations.	0.1	
7/19/2021	BBK	Reviewing/revising EH work product on DSS citations.	1.1	
7/19/2021	BBK	Emailing EH re revisions needed for DSS citation exhibits.	0.1	
7/19/2021	AX	Email correspondence w/ team re putative class members as subject of news story.	0.5	
7/19/2021	AX	Calls with JB, Loresia Vallette, and Michele Lytle re same.	0.4	
7/19/2021	AX	Email correspondence w/ GAB re deposition.	0.1	
7/19/2021	AX	Email correspondence w/ IT department re Sharepoint issues.	0.1	
7/19/2021	AX	Draft Bernie Jestrabek Hart declaration.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/19/2021	AX	Call with HF and related email correspondence w/ team re declaration.	1.0	
7/19/2021	EH	Compiling DSS citations against Brookdale facilities and revising chart re same for expert and BBK decl ISO motion for class cert.	7.9	
7/19/2021	KES	Download, circulate depo transcript and update TextMap.	0.4	
7/19/2021	KES	Update summary of memory care training docs and email JY re same.	0.6	
7/19/2021	KES	Email declarant re additional edits to declaration and review same.	0.4	
7/20/2021	MWB	Telephone call with GCG regarding settlement conference staffing and strategy.	0.3	
7/20/2021	BBK	Meeting w/ EH re DSS citation analysis and compilation.	0.3	
7/20/2021	BBK	Reviewing/approving additional DSS citations issued in spring/summer 2021 added by EH.	0.2	
7/20/2021	BBK	Conferring by phone w/ P Lindstrom re class rep decl.	0.8	
7/20/2021	BBK	Attending to sending P Lindstrom final class rep decl via DocuSign.	0.2	
7/20/2021	BBK	Conferring w/ P. Lindstrom and RBGG team re signed class rep decl.	0.1	
7/20/2021	BBK	Emailing w/ GW and JT re DSS citations and spreadsheet w/ summaries for C. Flores.	0.2	
7/20/2021	BBK	Emailing w/ EH re revisions to PDF of DSS citations.	0.2	
7/20/2021	BBK	Analyzing DSS citations and preparing spreadsheet w/ summaries thereof.	13.1	
7/20/2021	AX	Email correspondence w/ team re work in progress class member declarations and file locations.	0.1	
7/20/2021	AX	Email correspondence w/ team re updates on class member declaration status.	0.7	
7/20/2021	AX	Calls to putative class members and related review of DMS.	1.5	
7/20/2021	AX	Review CH draft declaration.	0.4	
7/20/2021	AX	Meeting with David Marks and Jim Thornton re pendant response data for class certification brief and follow up with related correspondence.	1.3	
7/20/2021	AX	Follow up with team re update on the same.	0.5	
7/20/2021	EH	Revising, compiling and identifying DSS complaints against Brookdale Facilities relevant to under staffing for expert.	7.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/20/2021	KES	Review status of draft declaration and email team re same; review chart of prior RBGG communications with putative class members and email team re potential follow up.	1.2	
7/21/2021	GCG	Conf w/ AX re research for class cert brief.	0.1	
7/21/2021	GCG	Email to MH re declaration.	0.1	
7/21/2021	BBK	Conferring w/ J. Thornton re spreadsheet of DSS citations and PDF of DSS reports for C Flores.	0.3	
7/21/2021	BBK	Emailing w/ EH re sharing PDFs of DSS reports w/ C Flores.	0.1	
7/21/2021	BBK	Attending to uploading PDFs of DSS reports and spreadsheet of DSS citations to J. Thornton.	0.2	
7/21/2021	BBK	Emailing w/ EH re preparing chart/summaries of DSS citations.	0.3	
7/21/2021	BBK	Reviewing AX report re plan for class member outreach.	0.1	
7/21/2021	BBK	Conferring w/ AX re class member declarations and analysis of DSS citations.	0.2	
7/21/2021	BBK	Conferring w/ RBGG team re outreach to former members of BD Fountaingrove Family Council.	0.1	
7/21/2021	BBK	Phone meeting w/ EH re plan of attack for charting and summarizing DSS citations.	0.4	
7/21/2021	BBK	Reviewing co-counsel emails re preparing materials for damages experts.	0.1	
7/21/2021	BBK	Reviewing AX report re meeting w/ D. Marks re pendant data analysis and proposal re use in staffing analysis.	0.1	
7/21/2021	BBK	Preparing for FU call w/ son of former resident of BD Anaheim Hills.	0.1	
7/21/2021	BBK	Left VM for son of former resident of BD Anaheim Hills.	0.1	
7/21/2021	BBK	Preparing spreadsheet charting and summarizing DSS citations.	8.5	
7/21/2021	AX	Analysis and related email correspondence w/ team and opposing counsel re pendant response data.	1.5	
7/21/2021	AX	Phone call with Bernie Jestrabek-Hart re declaration.	0.7	
7/21/2021	AX	Revise Bernie Jestrabek-Hart declaration and related email correspondence.	0.5	
7/21/2021	AX	Phone call with class member re declaration and related email correspondence.	1.5	
7/21/2021	AX	Call w/ GCG re case tasks.	0.1	
7/21/2021	AX	Discuss case tasks with BBK.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/21/2021	EH	Call with BBK re DSS complaints analysis.	0.4	
7/21/2021	EH	Drafting chart showing DSS citations against Brookdale facilities.	9.4	
7/21/2021	KES	Confer team re declarations; revise declaration for signature.	1.1	
7/22/2021	GCG	Emails to GW, HT, KH and WW re costs.	0.2	
7/22/2021	GCG	Email to GW and team re facility review reports.	0.1	
7/22/2021	BBK	Conferring w/ EH re analysis of DSS citations and preparing spreadsheet.	0.3	
7/22/2021	BBK	Conferring w/ AX re class declarations and class cert briefing.	0.2	
7/22/2021	BBK	Preparing spreadsheet charting and summarizing DSS citations.	4.9	
7/22/2021	BBK	Incorporating EH entries for DSS citations into spreadsheet and revising summaries accordingly.	4.2	
7/22/2021	AX	Phone conference w/ GK, putative class member, and draft related memo to file and correspondence to team.	0.4	
7/22/2021	AX	Phone conference w/ PI and draft related memo to file and correspondence to team.	0.5	
7/22/2021	AX	Phone calls to Brookdale putative class members.	0.5	
7/22/2021	AX	Draft updated Bernie Jestrabek-Hart declaration and related email correspondence w/ Bernie Jestrabek-Hart re same.	1.8	
7/22/2021	AX	Email correspondence w/ CS re declaration.	0.2	
7/22/2021	AX	Email correspondence w/ GAB re Brookdale deposition.	0.2	
7/22/2021	AX	Review transcript for Brookdale deposition on staffing and service alignment issues.	0.8	
7/22/2021	EH	Drafting chart showing DSS citations against Brookdale facilities.	8.7	
7/22/2021	KES	Confirm depo and email team re same; download and circulate video depo; review transcript status.	1.2	
7/23/2021	GCG	Conf w/ CW re class member outreach.	0.1	
7/23/2021	GCG	Emails to SJR & MB re costs.	0.1	
7/23/2021	MWB	Emails GCG - SJR and conference with GCG regarding expenses.	0.2	
7/23/2021	MWB	Conference with GCG and email regarding settlement.	0.2	
7/23/2021	SJR	Emails re arrangements.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/23/2021	BBK	Conferring w/ EH re updated PDFs of DSS citations for C. Flores.	0.1	
7/23/2021	BBK	Conferring w/ RBGG team re status of class declaration-gathering.	0.1	
7/23/2021	BBK	Conferring w/ AX re preparing class cert brief.	0.2	
7/23/2021	BBK	Meeting w/ co-counsel on class cert prep.	0.6	
7/23/2021	BBK	Revising/finalizing spreadsheet of DSS citations and summaries thereo.	2.6	
7/23/2021	BBK	Providing final spreadsheet/summaries of DSS citations and PDFs of DSS citations to C. Flores and J. Thornton; conferring w/ J. Thorton re same.	0.2	
7/23/2021	BBK	Drafting/sending report to co-counsel re DSS citation spreadsheet.	0.1	
7/23/2021	BBK	Conferring w/ JSY and AX re meeting w/ co-counsel on class cert prep week of 7/26.	0.2	
7/23/2021	BBK	Conferring w/ GW re meeting w/ co-counsel on class cert prep week of 7/26.	0.2	
7/23/2021	BBK	Conferring w/ AX re potential decl from former BD employee.	0.1	
7/23/2021	JSY	Emails re team meeting.	0.2	
7/23/2021	AX	Strategy meeting with GW, TC, and co-counsel CH team re progress on document related case tasks.	0.4	
7/23/2021	AX	Strategy meeting with BBK, GW, KES, EH, TC re class certification case tasks.	0.7	
7/23/2021	AX	Phone conference with ex Brookdale employee and related email correspondence w/ team re same.	0.5	
7/23/2021	AX	Phone conference with putative class member; re declaration.	0.1	
7/23/2021	AX	Phone conference with CH re declaration.	0.7	
7/23/2021	AX	Email correspondence w/ CH re declaration.	0.4	
7/23/2021	AX	Draft CH declaration and review related client documents.	2.2	
7/23/2021	AX	Review draft MPA iso class certification.	0.4	
7/23/2021	AX	Review email correspondence re CC, SF, and KB depositions.	0.3	
7/23/2021	AX	Email correspondence w/ JSY re GK intake/call notes.	0.2	
7/23/2021	AX	Confer w/ BBK re case tasks.	0.2	
7/23/2021	EH	Call with class member re declaration ISO of motion for class cert and revised same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/23/2021	EH	Conference with co-counsel re motion for class cert.	0.6	
7/23/2021	EH	Revising compilation of DSS citations against Brookdale facilities for expert.	1.5	
7/23/2021	KES	Zoom with co-counsel.	0.7	
7/23/2021	KES	Follow up re declaration.	0.2	
7/24/2021	GCG	Emails to GW, MJ, CW and team re class member outreach and declaration drafting.	0.3	
7/24/2021	BBK	Conferring w/ daughter of former BD Irvine resident re potential class decl.	0.2	
7/26/2021	GCG	Revise Grunfeld class cert declaration.	0.1	
7/26/2021	GCG	Confs w/ BBK and JSY and emails to team re class cert declarations and outreach to potential declarants.	0.2	
7/26/2021	BBK	Conferring w/ RBGG team re class member declarations.	0.2	
7/26/2021	BBK	Conferring w/ JSY and AX re GCG decl ISO class cert.	0.1	
7/26/2021	BBK	Reviewing GW draft introduction/facts section for class cert motion.	0.5	
7/26/2021	JSY	Draft GCG decl; research re same; emails re same.	2.2	
7/26/2021	JSY	Meeting with JS re CM declarations; emails re same.	0.5	
7/26/2021	JSY	Class member declarations; research re same; emails re same.	1.4	
7/26/2021	AX	Draft Loresia Vallette class cert. declaration.	2.7	
7/26/2021	AX	Call with ex Brookdale employee re experience with understaffing and draft notes to file.	1.0	
7/26/2021	AX	Email correspondence w/ GBW re staffing runs call.	0.2	
7/26/2021	AX	Email correspondence w/ team and putative class members re following up on declarations.	0.4	
7/26/2021	AX	Email correspondence w/ BJH re putative class members and experience at Scotts Valley facility.	0.2	
7/26/2021	AX	Call with JSY re case tasks.	0.5	
7/26/2021	AX	Review draft of GCG declaration iso class cert.	0.2	
7/26/2021	EH	Call with class member re declaration ISO motion for class cert (.8) and revising declaration (.5).	1.3	
7/26/2021	EH	Outreach to potential class members re motion for class cert.	1.4	
7/26/2021	EH	Revising and finalizing declaration from class member ISO motion for class cert.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 451

SERVICES

Date	Person	Description of Services	Hours	Discount
7/26/2021	KES	Review and circulate signed putative class member declaration in support of class cert; emails with declarant and team re same.	0.6	
7/26/2021	KES	Download and circulate depo transcripts and erratas; follow up re corrected exhibits for transcript.	0.7	
7/26/2021	JRS	Meeting with JSY on intake and drafting of declarations.	0.5	
7/27/2021	GCG	Meet w/ SW and RBGG teams to discuss review of ADA reports and class cert declarations and briefing.	1.7	
7/27/2021	GCG	Prepare for and conduct meeting w/ MB, CW and MJ to discuss plaintiff outreach.	1.2	
7/27/2021	GCG	Meet w/ JSY, BBK and AX to discuss class member declarations and facts to gather for brief.	0.5	
7/27/2021	GCG	Initial review of class cert brief.	0.3	
7/27/2021	GCG	Emails to team re same.	0.3	
7/27/2021	BBK	Reviewing GW agenda for co-counsel meeting; reviewing EH update re status of class declarations.	0.1	
7/27/2021	BBK	Conferring w/ EH re Unusual Incident Reports submitted by BD to DSS.	0.1	
7/27/2021	BBK	Conferring w/ JSY re potential class decl from former plaintiff who opted into arbitration.	0.1	
7/27/2021	BBK	Conferring w/ EH re creating DSS report exhibits for BBK decl ISO class cert.	0.2	
7/27/2021	BBK	Conferring w/ J. Thornton re C. Flores analysis of Issue Register of resident/family complaints to BD.	0.2	
7/27/2021	BBK	Meeting w/ co-counsel re class cert prep.	1.5	
7/27/2021	BBK	Conferring w/ AX and JSY re additional tasks for RBGG in prep for class cert.	0.1	
7/27/2021	BBK	Conferring w/ RBGG team re class decls.	0.1	
7/27/2021	BBK	Conferring w/ R. Steyer and RBGG team re class outreach.	0.1	
7/27/2021	BBK	Meeting w/ GCG/AX/JSY re class cert prep.	0.4	
7/27/2021	BBK	Reviewing/revising AX draft case task list for RBGG.	0.2	
7/27/2021	BBK	Drafting J. Carlson class decl.	3.6	
7/27/2021	JSY	Team meeting.	1.5	
7/27/2021	JSY	Meeting with GCG, BBK, AX re division of class cert. tasks.	0.4	
7/27/2021	JSY	Edit MTC re CAPs; research re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/27/2021	JSY	T/C with declarant TF.	1.1	
7/27/2021	JSY	CM declarations; multiple calls and emails re same; research re same.	3.8	
7/27/2021	AX	Review GW notes re expert facility reports in preparation for team meeting.	0.8	
7/27/2021	AX	Meeting with Brookdale team re reviewing expert facility accessibility reports, support re statement of facts and introduction, and other case tasks.	1.6	
7/27/2021	AX	Call with GCG re JB declaration.	0.1	
7/27/2021	AX	Confer with JSY re 6/25 meet and confer and related email correspondence re motion to compel.	0.3	
7/27/2021	AX	Email correspondence w/ team re Brookdale facility accessibility expert reports.	0.5	
7/27/2021	AX	Update Brookdale team task list.	0.4	
7/27/2021	AX	Correspondence w/JSY and JS re contact with putative class members for declarations.	0.7	
7/27/2021	AX	Call with US Legal and related discussion with KES re correction to 6/9 deposition transcript.	0.5	
7/27/2021	AX	Draft named plaintiff declaration iso class certification.	1.5	
7/27/2021	EH	Revising and compiling exhibits to BBK declaration re DSS citations.	4.5	
7/27/2021	EH	Research on potential class members ISO motion for class cert.	0.9	
7/27/2021	EH	Conference with co-counsel re motion for class cert.	1.5	
7/27/2021	EH	Call with class member re declaration ISO motion for class cert (.5); revising and finalizing declaration re same (.4).	0.9	
7/27/2021	EH	Outreach to potential clients ISO motion for class cert.	0.6	
7/27/2021	KES	Zoom with co-counsel re class certification tasks.	1.5	
7/27/2021	KES	Update TextMap with recent transcripts and videos.	0.6	
7/27/2021	JRS	Review case materials for intake calls and declarations.	1.5	
7/28/2021	GCG	Conf w/ JSY and emails to team re class cert declarations and facility reports.	0.2	
7/28/2021	GCG	Review JSY revisions to letter brief ISO personnel record request.	0.2	
7/28/2021	BBK	Conferring w/ EH re exhibits for BBK decl ISO class cert.	0.1	
7/28/2021	BBK	Conferring w/ JSY and AX re class outreach.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/28/2021	BBK	Reviewing JSY revisions to MTC corrective actions.	0.1	
7/28/2021	BBK	Drafting write-up of status of BBK class outreach for declarations for R. Steyer.	0.2	
7/28/2021	BBK	Conferring w/ RBGG team re reviewing expert inspection reports.	0.1	
7/28/2021	BBK	Drafting J. Carlson class decl.	2.6	
7/28/2021	JSY	Edit MTC re CAPs; emails re same; research re same.	1.0	
7/28/2021	JSY	Multiple emails re status of CM declarations.	0.5	
7/28/2021	JSY	Draft and edit CM declarations.	1.2	
7/28/2021	AX	Email correspondence w/ Bernie Jestrabek Hart re Scotts Valley residents.	0.1	
7/28/2021	AX	Confer with JS and JSY re Scotts Valley leads and HH declaration, including draft email re same.	0.7	
7/28/2021	AX	Email communication w/ JSY and BBK re declaration progress.	0.3	
7/28/2021	AX	Review deposition transcripts and supplement statement of facts and introduction with evidence.	3.2	
7/28/2021	AX	Email communication re same.	0.2	
7/28/2021	AX	Communication with team re facility report review.	0.2	
7/28/2021	EH	Call with potential class members re motion for class cert and mother's experiences at Brookdale Fountaingrove.	1.2	
7/28/2021	EH	Call with RS re class cert class member declarations.	0.4	
7/28/2021	EH	Revising and compiling exhibits to BBK declaration re DSS citations; revising chart re same.	4.7	
7/28/2021	EH	Organizing to file accessibility reports from experts.	0.4	
7/28/2021	KES	Download draft expert facility reports for attorney review.	0.5	
7/28/2021	KES	Emails with team re follow up re putative class member declarations.	0.3	
7/28/2021	JRS	Intake and write up of call with for Brookdale resident.	2.1	
7/28/2021	JRS	Update intake form for Brookdale resident following phone interview.	0.2	
7/28/2021	JRS	Call with declarant to review declaration.	1.0	
7/28/2021	JRS	Update to declaration following phone call with declarant.	0.4	
7/29/2021	GCG	Review and revise ADA barrier expert reports.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/29/2021	GCG	Emails to GW and team re same and email GW re oversized brief issues.	0.4	
7/29/2021	BBK	Conferring w/ R. Steyer re exhibit to 30b6 Topic 10 deposition.	0.1	
7/29/2021	BBK	Conferring w/ R. Steyer-RBGG team re further FU w/ potential declarants.	0.1	
7/29/2021	BBK	Revising J. Carlson class declaration.	1.1	
7/29/2021	BBK	Emailing co-counsel re J. Carlson draft decl.	0.1	
7/29/2021	BBK	Reviewing comm'ns w/ co-counsel re analysis of expert inspection reports.	0.1	
7/29/2021	BBK	Drafting R. Carlson class rep decl.	0.8	
7/29/2021	JSY	Review and edit CM declarations.	0.5	
7/29/2021	JSY	Review accessibility report.	1.3	
7/29/2021	KES	Review Sharepoint and other information for potential declarations.	0.8	
7/30/2021	GCG	Review and comment on Mastin report on architectural barriers.	3.2	
7/30/2021	GCG	Conf w/ JSY and emails to GW and team re same.	0.2	
7/30/2021	GCG	Meet w/ SW team to discuss revisions to brief and preparation of supporting declarations.	0.7	
7/30/2021	GCG	Meet w/ RBGG team re same.	0.3	
7/30/2021	GCG	Email to JSY and team re leads on class cert declarations.	0.2	
7/30/2021	GCG	Emails to EH and team re synthesizing class member declarations.	0.2	
7/30/2021	BBK	Meeting w/ co-counsel re prep for class cert.	0.7	
7/30/2021	BBK	Meeting w/ RBGG team re prep for class cert.	0.2	
7/30/2021	BBK	Conferring w/ RBGG team re analysis of expert inspection reports.	0.2	
7/30/2021	BBK	Drafting R. Carlson class rep decl.	0.9	
7/30/2021	BBK	Emailing co-counsel re J. Carlson and R. Carlson class rep decls.	0.1	
7/30/2021	BBK	Reviewing D. Marks update on staffing analysis.	0.1	
7/30/2021	BBK	Conferring w/ RBGG team re outreach to class members.	0.1	
7/30/2021	BBK	Revising section for MPA on DSS citations and resident complaints.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/30/2021	BBK	Reviewing co-counsel-JSY comm'ns re finalizing/filing joint discovery letter brief on corrective actions.	0.1	
7/30/2021	BBK	Reviewing AX-GW comm'ns re identifying/adding fact citations to MPA for class cert.	0.1	
7/30/2021	JSY	Team meeting.	1.2	
7/30/2021	JSY	Emails re MTC re CAPs.	0.3	
7/30/2021	JSY	Draft class member declaration; t/c re same.	0.6	
7/30/2021	JSY	Review accessibility report; emails and calls re same.	3.1	
7/30/2021	AX	Review and revise class member declaration, including supporting documentation and notes from JS.	2.5	
7/30/2021	AX	Brookdale team strategy call with co-counsel team re class cert case tasks.	0.5	
7/30/2021	AX	RBGG team strategy call re case tasks.	0.4	
7/30/2021	AX	Review Statement of Facts and Introduction re citations to fact record, including citations to depositions and produced documents and related correspondence with team.	2.8	
7/30/2021	AX	Review draft class certification brief.	0.5	
7/30/2021	KES	Zoom meeting with co-counsel re class certification tasks.	1.0	
7/30/2021	KES	Review information re additional declaration leads and emails with team re same.	1.8	
7/30/2021	KES	Follow up re correction to June 9 depo exhibit designations.	0.4	
7/30/2021	KES	Review discovery responses and email co-counsel re information for class cert.	0.5	
7/31/2021	GCG	Research and revise draft class certification brief.	2.0	
7/31/2021	GCG	Email GW and team re revisions to MPAs.	0.2	
7/31/2021	GCG	Review and revise JM architectural report.	2.0	
7/31/2021	GCG	Emails to GW and JSY re revisions needed.	0.3	
7/31/2021	GCG	Email to MWB and SJR re status.	0.1	
7/31/2021	MWB	Emails with GCG-SJR regarding status.	0.1	
7/31/2021	SJR	Emails re status.	0.3	
8/1/2021	GCG	Conf w/ GW and JSY re revisions to architectural expert reports.	0.5	
8/1/2021	GCG	Emails to GW re same and re call w/ experts.	0.1	
8/1/2021	GCG	Email BBK re class cert declarations.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 456

SERVICES

Date	Person	Description of Services	Hours	Discount
8/1/2021	BBK	Revising J. Carlson and R. Carlson class rep declarations per GW comments.	0.8	
8/1/2021	BBK	Emailing J. Carlson and R. Carlson re class rep decls.	0.2	
8/1/2021	BBK	Emailing w/ GCG re status of projects for class cert motion.	0.2	
8/1/2021	JSY	T/C with GCG and GBW re accessibility reports.	0.5	
8/1/2021	JSY	Draft CM declaration.	0.5	
8/2/2021	GCG	Prepare for and conduct call w/ experts re edits to architectural reports.	1.0	
8/2/2021	GCG	Review and revise Garden Grove report.	2.0	
8/2/2021	GCG	Emails to GW, JSY, GW and team re same.	0.4	
8/2/2021	GCG	Emails to GW re revisions to MPAs and potential need to amend complaint.	0.2	
8/2/2021	GCG	Prepare for and conduct call w/ KS, MJ and GW re potential settlement negotiations.	0.5	
8/2/2021	BBK	Reviewing GW-G.Maatman comm'ns re stipulating to extra pages for class cert briefing; conferring w/ team re same.	0.1	
8/2/2021	BBK	Reviewing comm'ns w/ co-counsel re Ds' supp production of pendant data; reviewing JSY-GMaatman com'ns re filing joint discovery letter brief re corrective actions.	0.1	
8/2/2021	BBK	Conferring w/ RBGG team re addressing clerk's failure to substitute correct plaintiff for H. Carlson.	0.1	
8/2/2021	BBK	Conferring w/ RBGG team re class declarations.	0.1	
8/2/2021	BBK	Conferring w/ J. Carlson re finalizing J. Carlson & R. Carlson class rep decls.	0.1	
8/2/2021	BBK	Meeting w/ co-counsel and accessibility experts re inspection reports.	1.0	
8/2/2021	BBK	Conferring w/ co-counsel re revising inspection report drafts.	0.1	
8/2/2021	BBK	Identifying/adding factual citations to MPA re DSS citations.	6.7	
8/2/2021	JSY	Finalize and file MTC re CAPs; emails re correction to same.	0.6	
8/2/2021	JSY	Call with declarant; draft declaration and finalize same.	1.2	
8/2/2021	JSY	Meeting re accessibility reports.	1.0	
8/2/2021	JSY	Edit accessibility reports; multiple emails re same.	4.7	
8/2/2021	EH	Call with putative class member regarding declaration ISO motion for class cert.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/2/2021	EH	Research re potential class member experiences for declaration ISO motion for class cert.	0.8	
8/2/2021	EH	Correspondence and outreach to potential class members re motion for class cert.	1.0	
8/2/2021	KES	Download and organize expert reports reviewed by SW.	0.8	
8/2/2021	KES	Review Sharepoint and related charts re follow up calls to putative class members and witnesses; review docs re same.	2.5	
8/2/2021	KES	Prepare chambers copy of letter brief.	0.3	
8/3/2021	GCG	Email MWB and SJR re co-counseling agreement and meeting to discuss same.	0.1	
8/3/2021	GCG	Review and revise expert architectural reports.	2.0	
8/3/2021	GCG	Confs w/ JSY and emails to team re same.	1.0	
8/3/2021	GCG	RBGG team meeting to discuss report review and class certification declarations.	0.5	
8/3/2021	GCG	Conf w/ and emails to EH and team re potential declaration leads.	0.4	
8/3/2021	GCG	Review and revise Grunfeld class cert declaration.	2.0	
8/3/2021	MWB	Emails with GCG-SJR regarding costs.	0.2	
8/3/2021	SJR	Emails re scheduling meeting.	0.4	
8/3/2021	BBK	Conferring w/ RBGG team re revising expert inspection reports.	0.2	
8/3/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.4	
8/3/2021	BBK	Emailing co-counsel re BBK Decl ISO class cert.	0.2	
8/3/2021	BBK	Identifying/adding fact citations to DSS reports to MPA ISO class cert.	4.3	
8/3/2021	BBK	Conferring w/ AX re MPA draft w/ fact citations.	0.1	
8/3/2021	BBK	Conferring w/ RBGG team re gathering class declarations.	0.1	
8/3/2021	BBK	Drafting language for BBK decl to sponsor DSS report exhibits.	0.2	
8/3/2021	BBK	Preparing assignment for AA to draft paragraphs for BBK decl ISO class cert sponsoring 570 DSS report exhibits.	0.3	
8/3/2021	BBK	Conferring w/ AA re drafting sponsoring paragraphs for BBK Decl ISO class cert.	0.2	
8/3/2021	BBK	Conferring w/ co-counsel re reviewing/revising expert inspection reports.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/3/2021	BBK	Reviewing GW guidance for reviewing/revising expert inspection reports.	0.3	
8/3/2021	BBK	Conferring w/ co-counsel re sealing motion.	0.1	
8/3/2021	BBK	Reviewing/commenting on AA progress on drafting exhibit-sponsoring paragraphs for BBK decl ISO class cert.	0.2	
8/3/2021	JSY	Meeting with RBGG team re case tasks.	0.5	
8/3/2021	JSY	Emails re CM declarations.	0.1	
8/3/2021	JSY	Edit accessibility reports; multiple emails and calls re same.	7.0	
8/3/2021	EH	Conference with team re motion for class cert and outstanding tasks.	0.5	
8/3/2021	EH	Call with GCG re class member outreach.	0.2	
8/3/2021	EH	Organizing class member declarations to file and updating tracking spreadsheet.	0.3	
8/3/2021	EH	Outreach to potential class members re motion for class cert.	0.9	
8/3/2021	KES	Follow up re deposition transcripts including emails to L. Castro with video transcripts and tc with US Legal re depo correction issue.	1.0	
8/3/2021	KES	Download and upload to OneDrive various correction expert reports to share with team.	1.7	
8/3/2021	KES	Review documents and contact information for potential declarants and follow up re same.	1.2	
8/4/2021	GCG	Meet w/ SJR and MWB re status of case and next steps.	0.8	
8/4/2021	GCG	Team meeting to discuss class cert pleadings and planning.	0.8	
8/4/2021	GCG	Conf w/ MJ and emails to GW and team re attempts to obtain stipulation to oversized brief.	0.7	
8/4/2021	GCG	Conf w/ GW, MJ and JSY re expert reports.	0.5	
8/4/2021	GCG	Conf w/ experts and GW, MJ and JSY re revisions to expert reports.	1.8	
8/4/2021	GCG	Review and revise expert reports.	0.5	
8/4/2021	GCG	Emails to AX, EH and team re class member outreach and revisions to pleadings.	0.2	
8/4/2021	MWB	Zoom conference with GCG and SJR regarding strategy and costs.	0.5	
8/4/2021	SJR	Zoom with MWB and GG.	0.5	
8/4/2021	BBK	Drafting update to GCG re class cert tasks.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/4/2021	BBK	Reviewing/revising expert inspection report re BD Riverside.	2.6	
8/4/2021	BBK	Meeting w/ co-counsel re class cert prep.	0.8	
8/4/2021	BBK	Meeting w/ GCG, JSY, GW and MJ re revising expert inspection reports.	0.7	
8/4/2021	BBK	Reviewing updated class cert motion filing checklist.	0.1	
8/4/2021	BBK	Reviewing comm'ns w/ opposing counsel re stipulation on pages for class cert briefing; conferring w/ litigation team re same.	0.2	
8/4/2021	BBK	Conferring w/ AX and JSY re revising expert inspection reports.	0.2	
8/4/2021	BBK	Emailing assignment to EH re revising/cite-checking BBK decl ISO class cert.	0.2	
8/4/2021	BBK	Conferring w/ AA re drafting exhibit-sponsoring paragraphs for BBK Decl ISO class cert.	0.1	
8/4/2021	JSY	Team meeting re class cert tasks.	0.8	
8/4/2021	JSY	Meeting with GCG, GBW, MTJ re edits to accessibility reports.	0.8	
8/4/2021	JSY	Meeting with experts re accessibility reports.	1.5	
8/4/2021	JSY	Edit accessibility reports; multiple emails re same.	4.2	
8/4/2021	AX	Email correspondence w/ team re declarant leads and residency agreements.	0.5	
8/4/2021	AX	Email correspondence w/ JT, MJ, DM re pendant data index issues.	0.2	
8/4/2021	AX	Email correspondence w/ KES re exhibits for Wallace declaration.	0.2	
8/4/2021	AX	Team strategy meeting re class certification issues and filing tasks.	0.8	
8/4/2021	AX	Update filing checklist and circulate to team, including correspondence re same.	0.3	
8/4/2021	AX	Email correspondence w/ EH re declarant issues.	0.2	
8/4/2021	AX	Review HH declaration and prepare for signature.	0.1	
8/4/2021	AX	Email correspondence w/ team re filing tasks.	0.2	
8/4/2021	AX	Email correspondence w/ team re stipulation for page limits.	0.2	
8/4/2021	AX	Correspondence w/ KES re admin motion to seal and review of motions.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/4/2021	EH	Correspondence and outreach to potential class members re motion for class cert.	2.7	
8/4/2021	EH	Call with putative class member regarding declaration ISO motion for class cert.	0.4	
8/4/2021	EH	Correspondence with team re residency agreements for potential class members.	0.4	
8/4/2021	KES	Begin gathering exhibits for Wallace Decl ISO class cert; review draft brief re same.	3.5	
8/4/2021	KES	Zoom with co counsel re class cert motion and preparing supporting documents.	1.0	
8/4/2021	KES	Review potential declarant documents and follow up re same; review Sharepoint and other notes re same.	1.3	
8/4/2021	KES	Draft admin motion to seal and review similar motions in other cases for motion language.	1.0	
8/5/2021	GCG	Review and revise expert reports on architectural barriers.	3.0	
8/5/2021	GCG	Confs w/ BBK and JSY and emails to GW, MJ and experts re same.	0.5	
8/5/2021	GCG	Putative class member outreach for declarations.	0.3	
8/5/2021	GCG	Conf w/ KES re Wallace declaration exhibits.	0.2	
8/5/2021	BBK	Conferring w/ EH re revising and cite-checking BBK decl ISO class cert.	0.2	
8/5/2021	BBK	Conferring w/ AX and co-counsel re revisions to MPA.	0.1	
8/5/2021	BBK	Conferring w/ co-counsel and litigation team re barriers under CRC in expert inspection reports.	0.4	
8/5/2021	BBK	Preparing list of barriers under CRC from Brookdale Riverside expert inspection report.	0.3	
8/5/2021	BBK	Conferring w/ litigation team re class decls.	0.1	
8/5/2021	BBK	Reviewing/revising expert inspection report of BD Riverside.	1.2	
8/5/2021	BBK	Conferring w/ JSY re reviewing/revising expert inspection reports.	0.2	
8/5/2021	BBK	Meeting w/ JSY and GCG re reviewing/revising expert inspection reports.	0.3	
8/5/2021	BBK	Conferring w/ co-counsel re reviewing/revising expert inspection reports.	0.2	
8/5/2021	BBK	Conferring by phone w/ J. Carlson and R. Carlson re class rep decls.	1.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/5/2021	BBK	Attending to finalizing/sending via DocuSign Carlson and R. Carlson re class rep decls.	0.3	
8/5/2021	JSY	Emails re class member declarations.	0.1	
8/5/2021	JSY	Review and edit access reports; multiple emails and conf re same.	7.5	
8/5/2021	AX	Email correspondence w/ team re pendant response data.	0.3	
8/5/2021	AX	Email correspondence w/ team re citations and support for class certification MPAs.	0.8	
8/5/2021	AX	Incorporate citations from RS, MJ, BBK into master draft.	1.5	
8/5/2021	EH	Research re subpoena to licensing re production of DSS complaint investigations and facility evaluation reports.	0.6	
8/5/2021	EH	Correspondence and outreach to potential class members re motion for class cert.	1.3	
8/5/2021	EH	Draft write-up re methodology for compiling and analyzing DSS citation reports.	1.8	
8/5/2021	KES	Continue gathering Wallace Decl exhibits.	2.8	
8/5/2021	KES	Telephone calls to potential declarants and prepare for same.	0.7	
8/5/2021	KES	Review files and Relativity for DSS subpoenas for EH preparation of BBK decl.	0.7	
8/5/2021	KES	Email GCG re class cert deadlines.	0.1	
8/5/2021	KES	Download and circulate stip.	0.1	
8/6/2021	GCG	Meet w/ SW team to plan class cert pleadings and brief.	0.8	
8/6/2021	GCG	Meet w. BU, JSY and MJ to discuss Schmidt declaration.	0.3	
8/6/2021	GCG	Meet w/ RBGG team to discuss gathering exhibits, filling in citations to brief and revising architectural barrier reports.	0.4	
8/6/2021	GCG	Research and revise Waters and Mastin reports.	2.4	
8/6/2021	GCG	Emails to GW, JM, GW, MJ and confs and emails to JSY re architectural barriers.	1.0	
8/6/2021	GCG	Research and draft memo to file re status of case and settlement attempts.	1.0	
8/6/2021	BBK	Reviewing/commenting on EH writeup for BBK decl on class cert re process for obtaining DSS reports from public website and via subpoena.	0.3	
8/6/2021	BBK	Conferring w/ co-counsel and JSY re confidentiality issues from expert photographs.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/6/2021	BBK	Reviewing revised guidance for revisions to expert inspection reports.	0.2	
8/6/2021	BBK	Conferring w/ RBGG team re class rep decls from J. Carlson and R. Carlson.	0.1	
8/6/2021	BBK	Reviewing AX and RS comm'ns re preparing chart of class member decls.	0.1	
8/6/2021	BBK	Meeting w/ co-counsel re class cert prep.	0.9	
8/6/2021	BBK	Emailing w/ GW and J. Thornton re chart of DSS citations.	0.2	
8/6/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.3	
8/6/2021	BBK	Conferring w/ EH re revisions to BBK decl ISO class cert.	0.2	
8/6/2021	BBK	Drafting language sponsoring DSS report exhibits obtained via subpoena.	0.2	
8/6/2021	BBK	Emailing w/ Ds re production of updated Issue Register of resident/family complaints.	0.1	
8/6/2021	BBK	Conferring w/ EH and R. Bonner re production of updated Issue Register of resident/family complaints.	0.1	
8/6/2021	BBK	Conferring w/ co-counsel re identifying potential new plaintiffs who are blind/low vision.	0.1	
8/6/2021	BBK	Conferring w/ team re revising expert accessibility reports.	0.2	
8/6/2021	BBK	Conferring w/ team re under seal filing and max size of documents for ND Cal ECF.	0.1	
8/6/2021	BBK	Conferring w/ JSY and AX re revisions to MPA ISO class cert.	0.1	
8/6/2021	BBK	Revising Masten report on BD Riverside.	3.2	
8/6/2021	BBK	Conferring w/ AA re revisions re BBK decl ISO class cert.	0.1	
8/6/2021	JSY	Team meetings re class cert tasks and issues with class rep. declaration.	1.4	
8/6/2021	JSY	Review and edit access reports; multiple conf. and emails re same.	3.5	
8/6/2021	AX	Team strategy meeting re class certification filing and related issues and case tasks.	1.6	
8/6/2021	AX	Email correspondence w/ RB, MJ re pendant response data to provide to counsel.	0.2	
8/6/2021	AX	Email correspondence w/ team re canceling meeting to discuss document review issues.	0.1	
8/6/2021	AX	Email correspondence w/ team re declaration chart and associated analysis.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/6/2021	AX	Update filing checklist and related correspondence re sealing motion.	0.3	
8/6/2021	AX	Reconcile citation additions and revisions from MJ, RS, BBK into master draft and supplement revisions and correspondence re same.	3.5	
8/6/2021	EH	Draft write-up re methodology for compiling and analyzing DSS citation reports.	0.9	
8/6/2021	EH	Conference with team and co-counsel re motion for class cert.	0.5	
8/6/2021	EH	Reviewing and compiling issue registrars for expert.	0.8	
8/6/2021	EH	Conference with team re motion for class cert and outstanding tasks.	0.5	
8/6/2021	KES	Continue gathering potential Wallace exhibits and create draft index of exhibits.	1.8	
8/6/2021	KES	Review draft brief and excerpt depo transcript cites for exhibit prep.	1.1	
8/6/2021	KES	Review local rules re ECF file sizes and under seal filings and email team re same.	0.4	
8/6/2021	KES	Email to relative of BKD resident to follow up re prior contact; review and update information re potential declarants in Sharepoint.	0.7	
8/6/2021	KES	Team Zoom re class cert.	1.5	
8/6/2021	KES	Review sample expert photo set for size issues for class cert filing.	0.3	
8/7/2021	GCG	Review and revise Hemet architectural report.	0.4	
8/7/2021	GCG	Emails to GW, BBK, JSY and GW re issues to address in accessibility reports.	0.3	
8/7/2021	MWB	Revise GCG report regarding status.	0.5	
8/7/2021	SJR	Review email draft to partners re status.	0.2	
8/7/2021	BBK	Revising BBK decl ISO class cert.	0.6	
8/7/2021	BBK	Reviewing/revising Masten accessibility report on BD Riverside.	1.2	
8/7/2021	BBK	Conferring w/ RBGG team re revisions to expert accessibility reports.	0.1	
8/7/2021	BBK	Conferring w/ GW re revisions to Masten BD Riverside report.	0.2	
8/7/2021	BBK	Reviewing/revising Masten expert report for BD San Marcos.	3.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/7/2021	BBK	Conferring w/ EH re revisions to BBK decl and DSS citation chart.	0.1	
8/7/2021	JSY	Edit accessibility reports; multiple emails re same.	6.0	
8/7/2021	AX	Correspondence w/ JSY re review of expert facility reports and related review.	1.5	
8/7/2021	EH	DSS complaints analysis and revisions for BBK declaration ISO motion for class cert.	5.0	
8/7/2021	KES	Pull depo transcript pages cited in draft class cert brief.	1.3	
8/8/2021	GCG	Emails to JSY, GW, MJ and experts re revisions to architectural barrier reports and MPAs.	0.5	
8/8/2021	SJR	Email to GG and MWB.	0.1	
8/8/2021	BBK	Conferring w/ co-counsel and J. Masten re revisions to accessibility reports.	0.2	
8/8/2021	BBK	Reviewing J. Masten guidance re revisions to accessibility reports.	0.2	
8/8/2021	BBK	Conferring w/ JSY and AX re revisions to expert accessibility reports.	0.5	
8/8/2021	BBK	Conferring w/ JSY and AX re class cert motion prep.	0.2	
8/8/2021	BBK	Conferring w/ GW and J. Thornton re meeting on DSS citation chart.	0.3	
8/8/2021	BBK	Conferring w/ co-counsel and AX/JSY re revisions to MPA ISO class cert.	0.3	
8/8/2021	BBK	Conferring w/ EH re revisions to chart of DSS citations.	0.1	
8/8/2021	BBK	Reviewing/revising Waters accessibility report for BD Scotts Valley.	3.9	
8/8/2021	BBK	Reviewing/revising Masten accessibility report for BD Riverwalk.	2.2	
8/8/2021	JSY	Edit accessibility reports; multiple emails re same.	5.1	
8/8/2021	JSY	Emails re issues with brief citations.	0.2	
8/8/2021	AX	Email correspondence w/ team and call w/ MJ re revisions to brief.	0.8	
8/8/2021	AX	Draft and revise Loresia Vallette declaration.	1.5	
8/8/2021	AX	Email correspondence w/ RS re declarant chart and related issues.	0.2	
8/8/2021	AX	Review expert facility report and associated communications with JSY, BBK.	1.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/8/2021	EH	Revising Exhibit 1 of DSS citations for BBK declaration ISO motion for class cert.	4.5	
8/9/2021	GCG	Emails to JSY and team re architectural expert report revisions.	0.1	
8/9/2021	BBK	Conferring w/ co-counsel re preparing chart of class declarations.	0.1	
8/9/2021	BBK	Reviewing/approving Masten revisions to Riverside accessibly report and conferring w/ Masten re same.	0.4	
8/9/2021	BBK	Reviewing updated protocols for revisions to accessibility reports and revising guidance accordingly.	0.6	
8/9/2021	BBK	Conferring w/ EH re meeting w/ JT re chart of DSS citations for C Flores.	0.1	
8/9/2021	BBK	Reviewing EH revisions to chart of DSS citations.	0.2	
8/9/2021	BBK	Conferring w/ JT and GW/MJ re meeting re chart of DSS citations for C Flores.	0.1	
8/9/2021	BBK	Reviewing/approving Masten revisions to San Marcos accessibility report.	0.3	
8/9/2021	BBK	Conferring w/ WP re expert accessibility reports ready to finalize.	0.1	
8/9/2021	BBK	Updating tracking chart of expert accessibility reports.	0.1	
8/9/2021	BBK	Conferring w/ AX re revisions to expert accessibility reports.	0.2	
8/9/2021	BBK	Conferring w/ co-counsel re construction date for Riverside facility and whether further revisions to accessibility report are needed.	0.2	
8/9/2021	BBK	Reviewing/revising Masten accessibility report for BD Anaheim.	1.3	
8/9/2021	BBK	Conferring w/ Masten re BD Anaheim accessibility report.	0.2	
8/9/2021	BBK	Preparing for call w/ JT/GW/MJ re DSS citations.	0.2	
8/9/2021	BBK	Meeting w/ JT/GW/MJ/EH re DSS citations.	0.8	
8/9/2021	BBK	Conferring by phone w/ EH re revisions to chart on DSS citations and BBK decl needed ILO meeting w/ JT/GW/MJ.	0.3	
8/9/2021	BBK	Emailing w/ JT/GW/MJ re next steps needed ILO meeting w/ JT/GW/MJ on BBK Decl and chart of DSS citations.	0.1	
8/9/2021	BBK	Emailing w/ daughter of former BD Irvine resident re potential declaration.	0.1	
8/9/2021	BBK	Attending to sharing updated Issue Registers of resident/family complaints w/ JT.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/9/2021	BBK	Conferring by phone w/ MJ re BBK Decl and DSS citation chart.	0.2	
8/9/2021	BBK	Conferring w/ EH re updated assignment re revisions to DSS chart and BBK decl ILO call w/ MJ re same.	0.1	
8/9/2021	BBK	Analyzing DSS citations and writing memo re same that specifically implicate regulations re understaffing.	1.7	
8/9/2021	BBK	Conferring w/ JSY/AX re class cert prep.	0.2	
8/9/2021	BBK	Revising Masten accessibility report re BD Riverside ILO new info re: construction date.	0.8	
8/9/2021	JSY	Edit accessibility reports; emails re same.	0.3	
8/9/2021	AX	Email correspondence w/ team re declarant chart and related issues.	0.5	
8/9/2021	AX	Call with RS re same.	0.2	
8/9/2021	AX	Review Anaheim Hills/Nohl Ranch expert report and correspondence w/ team re same.	3.5	
8/9/2021	AX	Legal research re proposed order for class certification motion and correspondence w/ BU re exemplars.	1.0	
8/9/2021	AX	Email correspondence w/ word processing team re finalizing declarations.	0.1	
8/9/2021	AX	Email correspondence w/ cocounsel re production of pendant data, including updating pendant data index.	0.3	
8/9/2021	AX	Email correspondence w/ team re check in for class certification briefing.	0.2	
8/9/2021	AX	Email correspondence w/ GW re assistance with brief and cite check.	0.1	
8/9/2021	AX	Review team correspondence re declaration's unit and inaccessible features.	0.1	
8/9/2021	EH	Call with co-counsel and Jim Thornton re expert analysis of DSS citations.	0.9	
8/9/2021	EH	Call with BBK re DSS complaints analysis work.	0.4	
8/9/2021	EH	Revising Exhibit 1 of DSS citations for BBK declaration ISO motion for class cert.	3.0	
8/9/2021	EH	Revising spreadsheet of DSS citations for expert declaration.	3.3	
8/9/2021	EH	Categorizing and analyzing class member declarations for class cert motion.	0.4	
8/9/2021	KES	Download and circulate discovery order.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/9/2021	KES	Troubleshoot blurring resident names from expert report photos.	0.5	
8/9/2021	KES	Download and circulate order granting stip.	0.1	
8/9/2021	KES	Update putative class member chart with citations to declarations completed by RBGG for class cert motion appendix.	5.5	
8/10/2021	GCG	Meet w/ RBGG team re architectural reports, declarations and proposed order.	0.5	
8/10/2021	GCG	Review and revise draft proposed order.	0.3	
8/10/2021	GCG	Conf w/ AX and emails to AX and GW re same.	0.3	
8/10/2021	GCG	Conf w/ and emails to JSY re architectural reports.	0.4	
8/10/2021	GCG	Emails to ML and CW re class member outreach.	0.3	
8/10/2021	BBK	Conferring w/ JSY-AX-co-counsel re expert accessibility report review.	0.2	
8/10/2021	BBK	Reviewing EH updates to DSS citation spreadsheet and sharing same w/ JT for C Flores.	0.2	
8/10/2021	BBK	Preparing for call w/ daughter of former resident of BD Irvine.	0.2	
8/10/2021	BBK	Conferring by phone w/ daughter of former resident of BD Irvine.	0.3	
8/10/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.5	
8/10/2021	BBK	Emailing w/ Masten re Riverwalk accessibility report.	0.1	
8/10/2021	BBK	Conferring w/ AX re photographs of B. Jestrabek-Hart's room at BD Scotts Valley in accessibility report.	0.1	
8/10/2021	BBK	Reviewing/approving final Riverside report.	0.3	
8/10/2021	BBK	Reviewing/revising Masten accessibility report for BD Anaheim.	2.3	
8/10/2021	BBK	Conferring by phone w/ GW/MJ re BBK decl ISO class cert.	0.2	
8/10/2021	BBK	Emailing w/ Waters re BD Scotts Valley accessibility report.	0.1	
8/10/2021	BBK	Conferring w/ RBGG team re Steyer Decl ISO class cert.	0.1	
8/10/2021	BBK	Reviewing/revising Waters accessibility report for BD San Juan Capistrano.	3.1	
8/10/2021	JSY	Edit accessibility reports; multiple emails re same.	7.3	
8/10/2021	AX	Team strategy meeting re filing.	0.5	
8/10/2021	AX	Review LV declaration and send to client for signature.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/10/2021	AX	Email correspondence w/ team re finalizing Anaheim Hills report and review of expert comments.	0.8	
8/10/2021	AX	Draft proposed order re class certification order and related correspondence.	2.1	
8/10/2021	AX	Email correspondence w/ RS, EH, KES and team re declarant tracking chart.	0.5	
8/10/2021	AX	Discuss revisions for proposed order.	0.2	
8/10/2021	AX	Correspondence w/ HH re revisions to declaration.	0.2	
8/10/2021	AX	Email correspondence w/ MJ, GW re privilege logs.	0.2	
8/10/2021	AX	Revise proposed order.	1.5	
8/10/2021	EH	Categorizing and analyzing class member declarations for class cert motion.	2.1	
8/10/2021	EH	Call with team re motion for class cert.	0.5	
8/10/2021	EH	Revising spreadsheet of DSS citations for expert declaration.	2.6	
8/10/2021	KES	PDF, redact resident names, and prepare 4 expert photo sets for filing.	3.0	
8/10/2021	KES	Confer EH re putative class member declaration cite chart.	0.2	
8/10/2021	KES	Download and circulate errata for PMK Topic 2 depo and pull corrected transcript pages for review.	0.3	
8/10/2021	KES	TC court reporter and email team re depo exhibit issue.	0.2	
8/10/2021	KES	Team Zoom re class cert motion.	0.4	
8/11/2021	GCG	Participate in team meeting re class cert motion.	0.8	
8/11/2021	GCG	Conf w/ MWB re same.	0.2	
8/11/2021	GCG	Meet w/ class rep ML.	0.5	
8/11/2021	GCG	Email to CW re same and re class member outreach.	0.1	
8/11/2021	GCG	Emails to AX re revisions to proposed order.	0.1	
8/11/2021	GCG	Conf w/ KES re Wallace exhibits.	0.1	
8/11/2021	GCG	Emails w/ experts and team re revisions to architectural reports.	0.1	
8/11/2021	BBK	Conferring w/ MJ and G. Waters re language in accessibility reports re Ds' representations.	0.1	
8/11/2021	BBK	Conferring w/ Masten re revising/finalizing accessibility reports.	0.1	
8/11/2021	BBK	Meeting w/ co-counsel re prep for class cert.	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/11/2021	BBK	Conferring w/ EH re exhibits for BBK Decl ISO class cert.	0.1	
8/11/2021	BBK	Conferring w/ KES re redactions to depo transcript exhibits.	0.2	
8/11/2021	BBK	Conferring w/ KES re photographs for expert accessibility reports.	0.1	
8/11/2021	BBK	Reviewing/revising Masten Riverwalk report per his final comments.	0.4	
8/11/2021	BBK	Reviewing/revising Waters San Juan Capistrano report per his final comments.	0.3	
8/11/2021	BBK	Conferring w/ WP re finalizing accessibility reports.	0.1	
8/11/2021	BBK	Conferring w/ JSY re revisions to accessibility reports.	0.1	
8/11/2021	BBK	Conferring w/ Waters re plan for further revisions to several facility accessibility reports.	0.2	
8/11/2021	BBK	Conferring w/ AX re class cert MPA revisions.	0.2	
8/11/2021	BBK	Updating tracking chart of accessibility reports.	0.1	
8/11/2021	JSY	Team meeting.	1.0	
8/11/2021	JSY	Meeting with experts re accessibility reports.	0.4	
8/11/2021	JSY	Conf. w/ BU re reviewing accessibility reports.	0.5	
8/11/2021	JSY	Review and edit accessibility reports; emails re same.	6.1	
8/11/2021	AX	Team strategy meeting re class certification filing and tasks.	1.0	
8/11/2021	AX	Email correspondence w/ KES re redacting deposition transcripts.	0.1	
8/11/2021	AX	Update filing checklist and send email re miscellaneous filing related issues.	0.5	
8/11/2021	AX	Email correspondence w/ MJ re Rita and Stacia Stiner declarations.	0.1	
8/11/2021	AX	Email correspondence w/ team re revisions to Marquis declaration.	0.3	
8/11/2021	AX	Email correspondence w/ EH re OCRing Cook, Rubin, Flynt deposition transcripts.	0.1	
8/11/2021	AX	Add citations to brief sections pursuant to GW, MJ emails.	2.2	
8/11/2021	AX	Update proposed order and correspondence re same.	1.2	
8/11/2021	AX	Correct Bernie Jestrabek-Hart declaration and get signature.	0.8	
8/11/2021	EH	Categorizing and analyzing class member declarations for class cert motion.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 470

SERVICES

Date	Person	Description of Services	Hours	Discount
8/11/2021	EH	Call with co-counsel re motion for class cert.	0.5	
8/11/2021	EH	Compiling exhibits sheets for BBK's declaration ISO motion for class cert.	1.8	
8/11/2021	KES	Gather, review, redact depo excerpts and finalize expert photosets in preparation for class cert motion.	7.5	
8/12/2021	GCG	Revise and finalize Grunfeld declarations.	0.5	
8/12/2021	GCG	Confs w/ and emails to JSY and team re architectural barrier reports.	0.5	
8/12/2021	GCG	Review and analyze Kennedy and Flores declarations.	0.7	
8/12/2021	GCG	Conf w/ and emails to AX re sealing issues.	0.5	
8/12/2021	GCG	Conf w/ KES re same.	0.2	
8/12/2021	GCG	Emails to GW re expert declarations and MPAs.	0.3	
8/12/2021	BBK	Conferring w/ AX and JSY re revisions to MPA iso Class Cert.	0.1	
8/12/2021	BBK	Reviewing/approving final Mastin report re BD Anaheim.	0.2	
8/12/2021	BBK	Conferring w/ WP re finalizing accessibility reports.	0.1	
8/12/2021	BBK	Conferring w/ G Waters re updated San Juan Capistrano access report.	0.1	
8/12/2021	BBK	Conferring w/ JSY and AX re revisions to expert access reports.	0.2	
8/12/2021	BBK	Conferring w/ co-counsel re R. Stiner and S. Stiner class rep decls.	0.1	
8/12/2021	BBK	Conferring w/ co-counsel re adding fact cites to MPA iso class cert.	0.1	
8/12/2021	BBK	Drafting BBK decl ISO class cert.	5.5	
8/12/2021	BBK	Emailing w/ co-counsel re reviewing/commenting on BBK decl ISO class cert.	0.1	
8/12/2021	BBK	Conferring w/ EH re finalizing BBK decl and supporting exhibits.	0.1	
8/12/2021	BBK	Reviewing AX proposal re sealing motion.	0.1	
8/12/2021	BBK	Reviewing C. Flores expert decl paragraphs on DSS citations and drafting comments for GW thereon.	0.5	
8/12/2021	BBK	Reviewing/revising updated Waters access report on BD San Juan Capistrano.	0.7	
8/12/2021	BBK	Conferring w/ GW re meeting w/ D. Marks and J. Thornton on 8/13 re C. Flores Decl.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 471

SERVICES

Date	Person	Description of Services	Hours	Discount
8/12/2021	JSY	Edit accessibility reports; emails re same.	7.8	
8/12/2021	AX	Confer w/ team re sealing issues, including email correspondence, phone call with GCG, and in person conversations.	1.5	
8/12/2021	AX	Draft email to team re: proposal for sealing issues.	1.3	
8/12/2021	AX	Review draft MPAs for missing citations, Wallace declaration, and related correspondence w/ team.	2.5	
8/12/2021	AX	Email correspondence w/ team re case tasks.	0.3	
8/12/2021	EH	Compiling and finalizing over 500 exhibits for BBK's declaration ISO motion for class cert.	2.9	
8/12/2021	EH	Correspondence re DSS citations with co-counsel.	0.3	
8/12/2021	KES	Review draft class cert papers, gather and prepare exhibits for motion.	7.0	
8/13/2021	GCG	Revise Wallace declaration.	0.5	
8/13/2021	GCG	Review BBK declaration.	0.4	
8/13/2021	GCG	Team meeting w/ SW to discuss class cert pleadings.	1.0	
8/13/2021	GCG	Follow up meeting w/ RBGG team to discuss same.	0.3	
8/13/2021	GCG	Review and revise draft MPAs.	0.5	
8/13/2021	GCG	Confs w/ and emails to AX, JSY, BBK and KES re revisions to class cert MPAs and declarations.	1.0	
8/13/2021	MWB	Review GCG updates.	0.1	
8/13/2021	SJR	Report from GG.	0.2	
8/13/2021	BBK	Reviewing JSY report re status of expert access reports.	0.1	
8/13/2021	BBK	Conferring w/ JSY/AX/GCG and co-counsel re redactions and sealing motion approach for class cert.	0.2	
8/13/2021	BBK	Reviewing/revising updated Waters San Juan Capistrano access report.	1.7	
8/13/2021	BBK	Meeting w/ GW/MJ/D. Marks/J. Thornton re C. Flores Decl.	0.7	
8/13/2021	BBK	Meeting w/ co-counsel re class cert prep.	1.0	
8/13/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.3	
8/13/2021	BBK	Conferring w/ JSY re FU w/ G. Waters re outstanding access reports.	0.1	
8/13/2021	BBK	Reviewing/approving final Waters San Juan Capistrano report.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/13/2021	BBK	Revising draft BBK Decl ISO class cert IRT meeting w/ GW/MJ/D. Marks/J. Thornton.	0.3	
8/13/2021	BBK	Conferring w/ GW re BBK Decl ISO class cert.	0.1	
8/13/2021	BBK	Proof-reading BBK Decl ISO class cert.	0.3	
8/13/2021	BBK	Conferring w/ RBGG team re finalizing BBK Decl ISO class cert.	0.2	
8/13/2021	BBK	Conferring w/ EH re final cite check of BBK Decl ISO class cert.	0.1	
8/13/2021	BBK	Conferring w/ JSY re expert access report review.	0.2	
8/13/2021	BBK	Conferring w/ RBGG team re prepping class cert motion.	0.2	
8/13/2021	BBK	Reviewing/commenting on draft Kailes expert decl re evacuation policies.	0.6	
8/13/2021	BBK	Conferring by phone and email w/ RBGG team re revisions/cite check for MPA.	0.4	
8/13/2021	BBK	Conducting legal cite check of MPA iso class cert.	2.3	
8/13/2021	JSY	Team meeting.	1.2	
8/13/2021	JSY	Edit accessibility reports; emails re same.	6.5	
8/13/2021	AX	Email correspondence w/ team re sealing motion.	0.7	
8/13/2021	AX	Revise Kennedy declaration and related correspondence w/ team.	0.8	
8/13/2021	AX	Team strategy meeting re class certification filing and related tasks.	1.4	
8/13/2021	AX	Revise and circulate filing checklist.	0.3	
8/13/2021	AX	Cite check legal citations in MPAs and related email and phone calls re same.	4.5	
8/13/2021	AX	Email correspondence w/ Bernie Jestrabek-Hart re declaration.	0.2	
8/13/2021	AX	Email correspondence re class member declarations.	0.2	
8/13/2021	EH	Compiling exhibits for Wallace declaration and drafting index of exhibits to same.	5.8	
8/13/2021	EH	Finalizing class rep declarations, Grunfeld and Marquis declarations for ECF filing.	0.4	
8/13/2021	EH	Correspondence with KES re outstanding exhibits for Wallace declaration.	0.4	
8/13/2021	EH	Conference with team re motion for class cert.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/13/2021	KES	Team Zoom re class cert motion.	1.0	
8/13/2021	KES	Review draft class cert papers, consider filing strategy, finalize photosets and prepare other exhibit documents.	7.0	
8/14/2021	GCG	Review Marquis and Schroyer declarations ISO class cert.	1.0	
8/14/2021	GCG	Finalize Grunfeld declaration.	0.4	
8/14/2021	GCG	Revise Waters reports.	0.6	
8/14/2021	GCG	Confs w/ JSY and emails to GW, AX and team re revisions to class cert pleadings.	0.8	
8/14/2021	BBK	Conferring w/ co-counsel re caption page for class cert pleadings.	0.1	
8/14/2021	BBK	Conferring w/ JSY re revising Waters access reports.	0.3	
8/14/2021	BBK	Reviewing/revising Waters Danville Diablo Road access report.	0.8	
8/14/2021	BBK	Reviewing/revising Waters San Juan Capistrano access report.	0.8	
8/14/2021	BBK	Conferring w/ JSY re revising Waters photo reports.	0.1	
8/14/2021	BBK	Reviewing/revising Waters photo report for Danville Diablo Road.	0.2	
8/14/2021	BBK	Reviewing comm'ns w/ R. Steyer re class member declarations.	0.1	
8/14/2021	BBK	Reviewing comm'ns w/ litigation team re proposed order granting class cert.	0.1	
8/14/2021	BBK	Reviewing/revising EH cite-check of BBK Decl iso class cert.	0.3	
8/14/2021	BBK	Drafting/sending update to J. Thornton re DSS citation count for C. Flores expert decl.	0.3	
8/14/2021	BBK	Conferring w/ J. Thornton re revisions to C. Flores expert decl.	0.1	
8/14/2021	BBK	Drafting/sending update to GW re final BBK Decl iso class cert.	0.2	
8/14/2021	BBK	Reviewing/revising Waters access report for BD Danville Diablo Road.	2.7	
8/14/2021	BBK	Conferring w/ KES re redactions to photos for Waters access report for BD Danville Diablo Road.	0.1	
8/14/2021	BBK	Conferring w/ JSY re revisions to access reports.	0.2	
8/14/2021	BBK	Conferring w/ RBGG team re redactions to docs to be filed under seal.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/14/2021	BBK	Revising Waters South Tarzana access report.	0.7	
8/14/2021	BBK	Revising Waters Mirage Inn access report.	0.8	
8/14/2021	BBK	Reviewing final changes to Waters Danville Diablo Road access report.	0.2	
8/14/2021	BBK	Reviewing JSY FU to Mastin and Waters re outstanding access reports.	0.1	
8/14/2021	BBK	Reviewing draft Schroyer expert decl.	0.3	
8/14/2021	BBK	Comparing Waters Danville Diablo Road report to incorporate any changes.	0.2	
8/14/2021	JSY	Edit and finalize accessibility reports; emails and calls re same.	9.8	
8/14/2021	AX	Revise proposed order.	0.5	
8/14/2021	AX	Email correspondence w/ MJ and team re Fleet safety policy.	0.2	
8/14/2021	AX	Email correspondence w/ team re proposed order.	0.3	
8/14/2021	AX	Correspondence w/ L. Vallette re declaration.	0.2	
8/14/2021	AX	Email correspondence w/ team re class member declarations.	0.7	
8/14/2021	AX	Revise motion to seal materials, including MPA, Appendix A to admin motion to seal, Grunfeld declaration ISO, and Proposed Order.	1.8	
8/14/2021	AX	Review Schroyer declaration for redactions and related correspondence with team.	1.5	
8/14/2021	AX	Email correspondence w/ RS re class member declarations and case tasks.	0.3	
8/14/2021	EH	Correspondence with AX and KES re exhibits to Wallace declaration ISO motion for class cert.	0.3	
8/14/2021	EH	Cite checking BBK's declaration ISO motion for class cert.	3.4	
8/14/2021	EH	Confer with BBK re cite check of declaration.	0.2	
8/14/2021	EH	Reviewing class rep declarations for Rachel's declaration ISO motion for class cert.	0.3	
8/14/2021	EH	Redacting and preparing for ECF filing photo access reports for Waters declaration.	1.0	
8/14/2021	EH	Compiling exhibits for Wallace declaration.	1.6	
8/14/2021	EH	Confer with AX re redactions to confidential information in Shroyer declaration.	0.4	
8/14/2021	EH	Marking proposed redactions to Shroyer declaration ISO motion for class cert.	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/14/2021	KES	Review, redact and finalize photosets for expert report ISO class cert motion; review documents and rules in preparation for filing.	4.5	
8/15/2021	GCG	Team meeting to discuss status of class cert pleadings.	0.5	
8/15/2021	GCG	Email w/ class cert declarant.	0.1	
8/15/2021	GCG	Emails to JSY and team re finalizing architectural barrier and expert reports.	0.4	
8/15/2021	GCG	Review and analyze Kailes and Cross expert declarations.	0.5	
8/15/2021	GCG	Emails to GW and team re Wallace declaration and proposed order.	0.2	
8/15/2021	BBK	Proofing Exhibit 1 to BBK Declaration (97 page chart of DSS citations).	2.2	
8/15/2021	BBK	Conferring w/ J. Thornton re final spreadsheet of DSS citations.	0.1	
8/15/2021	BBK	Conferring w/ EH re finalizing BBK Declaration ISO class cert and exhibits thereto.	0.1	
8/15/2021	BBK	Conferring w/ TC re reviewing/commenting on Cross Expert Decl.	0.1	
8/15/2021	BBK	Reviewing/commenting on Cross Expert Decl.	0.2	
8/15/2021	BBK	Conferring w/ JSY re status of expert access report review/finalization.	0.1	
8/15/2021	BBK	Conferring w/ RBGG team and co-counsel re redactions to expert declarations and exhibits to GW Decl.	0.1	
8/15/2021	BBK	Conferring w/ JSY/KES re reviewing/revising Waters access report on BD San Jose and redacting photo set.	0.1	
8/15/2021	BBK	Meeting w/ RBGG team re class cert prep.	0.4	
8/15/2021	BBK	Conferring w/ WP re finalizing expert access reports.	0.1	
8/15/2021	BBK	Reviewing/revising Waters barrier list for BD San Jose access report.	2.1	
8/15/2021	BBK	Reviewing/revising final draft Danville Diablo Road access report and barriers list.	0.2	
8/15/2021	BBK	Reviewing/revising Waters BD San Jose access report.	0.4	
8/15/2021	BBK	Conferring w/ JSY re quality control for final expert access reports.	0.2	
8/15/2021	BBK	Quality control review and revision of all completed Waters access reports.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/15/2021	BBK	Reviewing JSY FU w/ J. Mastin and G. Waters re declarations and outstanding access reports.	0.1	
8/15/2021	BBK	Reviewing AX-MJ comm'ns re approach for redactions to GW declaration.	0.1	
8/15/2021	JSY	RBGG team call re class cert tasks.	0.5	
8/15/2021	JSY	Edit accessibility reports; multiple emails re same.	4.9	
8/15/2021	AX	Team check in call.	0.5	
8/15/2021	AX	Review Cross declaration for errors and mark redactions.	0.8	
8/15/2021	AX	Email correspondence re same.	0.2	
8/15/2021	AX	Update class certification check-list.	0.2	
8/15/2021	AX	Email correspondence re sealing Wallace declaration and related exhibit.	0.5	
8/15/2021	AX	Email correspondence re redactions to Cross declaration.	0.5	
8/15/2021	AX	Email correspondence re redactions to Schroyer declaration.	0.3	
8/15/2021	AX	Summarize points about redaction methodology for team meeting.	0.3	
8/15/2021	AX	Review Flores declaration.	0.7	
8/15/2021	AX	Discussion with EH re gathering Wallace declaration exhibits.	0.2	
8/15/2021	EH	Compiling exhibits for Wallace declaration and drafting index of exhibits to same.	4.9	
8/15/2021	EH	Call with KES re exhibits to Wallace declaration.	0.4	
8/15/2021	EH	Finalizing under seal and redacted versions of Kailes, Cross and Shroyer declarations.	0.8	
8/15/2021	EH	Conference with team re motion for class cert.	0.5	
8/15/2021	EH	Correspondence with MTJ re exhibits to Wallace declaration.	0.4	
8/15/2021	KES	Review, PDF and redact expert photos for class cert; review draft class cert docs.	4.3	
8/16/2021	GCG	Research and revise admin motion to seal.	1.0	
8/16/2021	GCG	Conf w/ AX and emails to team re same.	0.2	
8/16/2021	GCG	Prepare for and conduct team meeting re pleadings to finalize for class cert filing.	0.7	
8/16/2021	GCG	Confs w/ and emails to JSY and team re redactions, cite checking and review of pleadings.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/16/2021	BBK	Reviewing AX's updated comprehensive filing checklist for cert motion.	0.1	
8/16/2021	BBK	Conferring w/ AX re Mastin and Waters declarations and exhibits.	0.1	
8/16/2021	BBK	Meeting w/ co-counsel re class cert motion prep.	0.6	
8/16/2021	BBK	Meeting w/ RBGG team re class cert motion prep.	0.3	
8/16/2021	BBK	Reviewing/approving final draft barrier list and report for Waters BD San Jose report.	0.2	
8/16/2021	BBK	Conferring w/ JSY re finalizing/reviewing expert access reports.	0.2	
8/16/2021	BBK	Finalizing Waters BD Danville Diablo Road access report.	0.1	
8/16/2021	BBK	Conferring w/ WP re expert access reports.	0.2	
8/16/2021	BBK	Conferring w/ EH re redactions to Flores and Schroyer expert decls.	0.2	
8/16/2021	BBK	Conferring w/ team re under seal Flores and Schroyer decls.	0.1	
8/16/2021	BBK	Attending to finalizing/executing BBK Decl ISO class cert.	0.2	
8/16/2021	BBK	Reviewing/approving final BBK Decl and Exhibits.	0.2	
8/16/2021	BBK	Conferring w/ AX re potential need to seal additional portions of Flores and Schroyer Decls.	0.3	
8/16/2021	BBK	Reviewing/approving final draft Waters BD San Jose access report.	0.2	
8/16/2021	BBK	Conferring w/ JSY re quality control review of final class rep decls.	0.1	
8/16/2021	BBK	Conferring w/ B Umpierre re redactions to decls.	0.1	
8/16/2021	BBK	Conferring w/ CN and KES re finalizing Waters BD San Jose access report.	0.2	
8/16/2021	BBK	Conferring w/ AX and EH re updated final Flores and Schroyer Decls.	0.2	
8/16/2021	BBK	Conferring w/ RBGG team re Marks and Stebner Decls and Fisher class rep decl.	0.2	
8/16/2021	BBK	Preparing fact cites for MPA ISO class cert for section on DSS citations.	0.5	
8/16/2021	BBK	Reviewing/revising updated Waters BD Scotts Valley report and barrier list.	2.1	
8/16/2021	BBK	Reviewing/approving final Waters BD Scotts Valley report and barrier list.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/16/2021	BBK	Analyzing Flores Expert Decl to determine what redactions are needed.	1.8	
8/16/2021	BBK	Conferring w/ team re revisions to Wallace Decl ISO cert and Exhibits.	0.1	
8/16/2021	BBK	Conferring w/ team re revisions to sealing motion.	0.1	
8/16/2021	JSY	Team meeting re class cert tasks.	0.6	
8/16/2021	JSY	Prepare and edit documents re class cert filing; emails and calls with team re same.	8.4	
8/16/2021	AX	Update filing checklist.	0.2	
8/16/2021	AX	Team strategy meeting re class cert motion.	0.8	
8/16/2021	AX	Update filing checklist.	0.1	
8/16/2021	AX	Email correspondence re motion to seal.	0.1	
8/16/2021	AX	Review and make Schroyer declaration redactions, including reviewing Aegis and Sunrise pleadings.	0.8	
8/16/2021	AX	Review Kailes, Cross declaration redactions.	0.3	
8/16/2021	AX	Review Steyer declaration and appendix of class member/witness declarations.	0.3	
8/16/2021	AX	Call w/ RS re same.	0.3	
8/16/2021	AX	Email correspondence w/ team re cite check.	0.4	
8/16/2021	AX	Cite check part of class member and witness declaration appendix.	1.3	
8/16/2021	AX	Cite check sealing pleadings.	1.5	
8/16/2021	AX	Email correspondence re: sealing pleadings with team.	0.4	
8/16/2021	AX	Email correspondence w/ team re misc items for class cert filing.	0.3	
8/16/2021	AX	Discuss Wallace decl exhibits w/ team.	0.3	
8/16/2021	EH	Conference with co-counsel re motion for class cert.	1.0	
8/16/2021	EH	Marked proposed redactions for Kennedy declaration ISO motion for class cert.	0.8	
8/16/2021	EH	Finalizing BBK declaration ISO motion for class cert.	2.0	
8/16/2021	EH	Correspondence with team re redactions of confidential information for expert declarations.	0.6	
8/16/2021	EH	Revising and finalizing expert declarations for ECF filing.	0.5	
8/16/2021	EH	Redacting Kailes, Cross, and Shroyer declarations.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/16/2021	EH	Cite checking Steyer declaration tables with class member declarations.	2.1	
8/16/2021	EH	Compiling exhibits for Wallace declaration and revising index re same.	2.5	
8/16/2021	KES	Team Zoom re class cert motion.	1.0	
8/16/2021	KES	Review, cite check and revise documents in support of class cert motion.	7.0	
8/17/2021	GCG	Review and finalize sealing pleadings.	1.0	
8/17/2021	GCG	Confs and emails w/ SW and RBGG teams re revisions, cite checking and redacting pleadings ISO class cert motion.	1.8	
8/17/2021	GCG	Review and revise Mastin and Waters declarations.	0.2	
8/17/2021	GCG	Review and revise appendix listing sealed pleadings.	0.3	
8/17/2021	GCG	Revise case captions to prepare for filing.	0.2	
8/17/2021	BBK	Conferring w/ RBGG team re status of Mastin and Waters access reports.	0.1	
8/17/2021	BBK	Reviewing/commenting on Steyer Decl ISO class cert and Tables of class member and witness decls.	0.2	
8/17/2021	BBK	Reviewing/approving B. Umpierre proposed additional redactions to Flores Decl.	0.2	
8/17/2021	BBK	Meeting w/ co-counsel re finalizing class cert motion and pleadings.	0.6	
8/17/2021	BBK	Reviewing/commenting on final draft MPA iso Class Cert.	1.0	
8/17/2021	BBK	Conferring w/ co-counsel and RBGG team re plan for fact-citation check for MPA and Wallace Decl.	0.2	
8/17/2021	BBK	Conferring w/ JSY and EH re fact-check of number of BD facilities cited by DSS for understaffing.	0.2	
8/17/2021	BBK	Conducting fact check of Wallace Decl and MPA iso class cert.	3.9	
8/17/2021	BBK	Emailing w/ GW/MJ re fact-check of MPA and Wallace Decl.	0.1	
8/17/2021	BBK	Reviewing comm'ns w/ RBGG team re finalizing motion to seal and appendices thereto.	0.1	
8/17/2021	BBK	Conferring w/ JSY and AX re redactions to MPA and Wallace Decl.	0.2	
8/17/2021	BBK	Conferring w/ team re proposed order certifying classes.	0.1	
8/17/2021	BBK	Conferring w/ JSY and AX re protocols for redactions for MPA.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/17/2021	BBK	Emailing w/ co-counsel re protocols for redactions for MPA.	0.2	
8/17/2021	BBK	Reviewing updated comprehensive filing checklist for cert motion.	0.1	
8/17/2021	BBK	Second meeting w/ co-counsel re last pieces for cert motion.	0.6	
8/17/2021	BBK	Second meeting w/ RBGG team re last pieces for cert motion.	0.2	
8/17/2021	BBK	Conferring w/ team re preparing captions for under seal and redacted pleadings.	0.1	
8/17/2021	BBK	Conferring w/ team re finalizing Waters and Mastin expert decls.	0.2	
8/17/2021	BBK	Conferring w/ team re revisions to Wallace Decl ISO cert.	0.2	
8/17/2021	BBK	Conferring w/ team re finalizing sealing motion.	0.1	
8/17/2021	BBK	Analyzing and preparing proposed redactions to Wallace Decl ISO class cert.	1.1	
8/17/2021	JSY	Emails re finalizing access reports.	0.2	
8/17/2021	JSY	2 team meetings re class cert tasks.	1.1	
8/17/2021	JSY	Prepare and edit documents re class cert filing; multiple calls and emails re same.	8.4	
8/17/2021	AX	Email correspondence w/ team re brief cite check and related logistics.	0.8	
8/17/2021	AX	Team meeting via zoom re class certification filing and related tasks.	0.6	
8/17/2021	AX	Team meeting via zoom re class certification filing and related tasks.	0.8	
8/17/2021	AX	Record cite check of MPA and related team correspondence.	3.0	
8/17/2021	AX	Review and cite check of Wallace declaration, including related team correspondence.	0.8	
8/17/2021	AX	Review Kennedy declaration and apply redactions according to protective order, including related correspondence w/ team.	1.5	
8/17/2021	AX	Review revisions to proposed order and related correspondence w/ team.	0.7	
8/17/2021	AX	Review revisions to Appendix A of sealing motion and related correspondence w/ team.	0.8	
8/17/2021	AX	Correspondence w/ team re redactions and admin motion to seal.	0.3	
8/17/2021	AX	Email correspondence re miscellaneous issues.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/17/2021	EH	Conference with co-counsel re motion for class cert and outstanding tasks.	0.9	
8/17/2021	EH	Conference with co-counsel re motion for class cert and outstanding tasks.	0.7	
8/17/2021	EH	Finalizing motion and exhibits to admin motion to file documents under seal.	1.5	
8/17/2021	EH	Cite-checking BBK declarations and revising same.	0.8	
8/17/2021	EH	Revising and finalizing appendix a of redacted/under seal documents ISO admin motion to file under seal.	1.2	
8/17/2021	EH	Redacting Kennedy and Flores declarations.	1.1	
8/17/2021	EH	Compiling exhibits for Wallace declaration and drafting index of exhibits to same.	4.5	
8/17/2021	EH	Revising Wallace declaration and correspondence with team re same.	0.4	
8/17/2021	EH	Revising caption pages on finalized expert declarations ISO motion for class cert.	0.7	
8/17/2021	KES	Team Zoom re class cert filing.	0.5	
8/17/2021	KES	Review documents to be filed and local ECF rules; determine sequence of document filing.	1.3	
8/17/2021	KES	Review and revise exhibits and other supporting documents for class cert motion.	8.0	
8/18/2021	GCG	Team meetings to discuss finalizing class cert motion.	1.0	
8/18/2021	GCG	Review pleadings for errors.	1.0	
8/18/2021	GCG	Oversee e-filing of motion for class certification.	1.0	
8/18/2021	GCG	Draft summary of motion.	0.3	
8/18/2021	GCG	Review emails from experts.	0.2	
8/18/2021	BBK	Conferring w/ RBGG team and MJ re redactions to Wallace Decl.	0.2	
8/18/2021	BBK	Conferring w/ BU re proposed redactions and revisions to Wallace Decl.	0.2	
8/18/2021	BBK	Conferring w/ WP re finalizing Wallace Decl.	0.1	
8/18/2021	BBK	Meeting w/ co-counsel re finalizing/filing cert motion.	0.3	
8/18/2021	BBK	Meeting w/ GCG re finalizing cert motion.	0.1	
8/18/2021	BBK	Conferring w/ JSY re redacting MPA and Wallace Decl.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/18/2021	BBK	Conferring w/ co-counsel re proposed filing sequence for cert pleadings.	0.1	
8/18/2021	BBK	Conferring w/ RBGG team re plan for quality control review of docs prior to filing.	0.1	
8/18/2021	BBK	Conferring w/ co-counsel and JSY re finalizing Mastin decl.	0.1	
8/18/2021	BBK	Conferring w/ JSY/AX/CG re finalizing MPA.	0.2	
8/18/2021	BBK	Conducting quality control review of and last corrections to pleadings for class cert motion.	3.4	
8/18/2021	BBK	Filing class cert motion and admin motion to seal.	2.2	
8/18/2021	BBK	Conferring w/ RBGG team re courtesy copy requirement.	0.1	
8/18/2021	JSY	Team meeting re class cert filing.	0.4	
8/18/2021	JSY	Prepare and edit documents for class cert filing; file documents; multiple emails and calls re same and re courtesy copies of same.	7.2	
8/18/2021	AX	Team meeting re class certification issues, filing, and case tasks.	0.3	
8/18/2021	AX	Review brief for typographical errors and consistency, including review for redactions pursuant to protective order.	2.0	
8/18/2021	AX	Trouble-shooting version control issues re brief prior to filing.	2.0	
8/18/2021	AX	Assist with filing.	1.5	
8/18/2021	EH	Conference with team re motion for class cert and steps to filing.	0.5	
8/18/2021	EH	Revising caption pages on finalized expert declarations ISO motion for class cert.	0.8	
8/18/2021	EH	Finalizing Wallace declaration and index of exhibits to same.	2.4	
8/18/2021	EH	Redacting Wallace declaration.	0.5	
8/18/2021	EH	Filing with KES motion for class cert and attachments to same.	2.0	
8/18/2021	EH	Organizing and compiling to file all ECF pleadings for motion for class cert.	2.0	
8/18/2021	EH	Redacting MPA for Pls motion for class cert.	0.4	
8/18/2021	KES	Assist with review, revision and finalization of motion to certify class; efile motion and all supporting documents.	7.5	
8/19/2021	GCG	Emails to GW and team re courtesy copies, outreach to additional declarants and expert disclosures.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/19/2021	BBK	Conferring w/ RBGG team re courtesy copies of motion for class cert.	0.1	
8/19/2021	BBK	Conferring w/ co-counsel and RBGG team re class cert filing.	0.1	
8/19/2021	JSY	Emails and conf. re courtesy copies.	0.3	
8/19/2021	EH	Organizing and compiling to file all ECF pleadings for motion for class cert.	1.9	
8/19/2021	KES	Review emails from court clerk re docket entries and confer with team re same.	0.3	
8/19/2021	KES	Update electronic files with under seal documents and word versions.	0.6	
8/20/2021	GCG	Emails w/ putative class members, DW and MJ re outreach to additional declarants.	0.2	
8/20/2021	GCG	Conf w/ EH re same.	0.1	
8/20/2021	GCG	Review class member declaration.	0.1	
8/20/2021	BBK	Conferring w/ daughter of former BD Irvine resident re potential declaration ISO class cert.	0.1	
8/20/2021	BBK	Emailing w/ J. Carlson and P. Lindstrom re class cert filing.	0.2	
8/20/2021	EH	Call with GCG re class member declaration.	0.2	
8/23/2021	GCG	Emails to MJ and team re defendants' request for extension of time to file response to motion to seal.	0.2	
8/23/2021	GCG	Conf w/ RS re declarants and putative class member outreach.	0.2	
8/23/2021	GCG	Email to JSY and team re same.	0.2	
8/23/2021	BBK	Conferring w/ J. Thornton re planned production of spreadsheet of DSS citations as part of C. Flores expert disclosure.	0.2	
8/23/2021	BBK	Reviewing comm'ns w/ team re class declarants.	0.1	
8/23/2021	BBK	Conferring w/ co-counsel re Ds' request for EOT to file declaration ISO motion to seal docs designated confidential by Ds.	0.1	
8/23/2021	JSY	Emails with ML and JA re filing.	0.1	
8/23/2021	KES	Review emails re potential interview candidates.	0.2	
8/24/2021	GCG	Conf w/ MH re Fountaingrove issues.	0.2	
8/24/2021	GCG	Emails to GW re mediation and costs.	0.2	
8/24/2021	GCG	Emails to GM and MJ re stipulation.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 484

SERVICES

Date	Person	Description of Services	Hours	Discount
8/24/2021	GCG	Review court order extending time to file sealing declaration.	0.1	
8/24/2021	GCG	Confs w/ and emails to JSY and RS re declarants and additional outreach.	0.2	
8/24/2021	BBK	Reviewing Ds' admin motion for EOT to file decl ISO sealing motion and court order re same.	0.1	
8/24/2021	BBK	Reviewing/responding to GW query re BD responses to DSS citations and corrective actions re same.	0.2	
8/24/2021	BBK	Conferring w/ J. Thornton re disclosing DSS reports reviewed by C. Flores for decl ISO class cert.	0.2	
8/24/2021	BBK	Reviewing comm'ns w/ opposing counsel/co-counsel re mediation.	0.1	
8/24/2021	JSY	Conf w/ GCG re CMs; LM for CM re same.	0.2	
8/24/2021	AX	Correspondence w/ Bernie Jestrabek-Hart and Loresia Vallette re update on class certification filings.	0.3	
8/24/2021	KES	Download and circulate pleadings and calendar deadline re motion to seal.	0.3	
8/24/2021	KES	Review mediation email and calendar deadline for brief.	0.1	
8/25/2021	GCG	Review and comment on MJ letter to defendants re expert disclosure and emails to team re same.	0.2	
8/25/2021	BBK	Reviewing draft letter to opposing counsel re expert disclosures.	0.1	
8/30/2021	GCG	Outreach to putative class member.	0.1	
8/30/2021	GCG	Email to RS re same.	0.1	
8/31/2021	GCG	Conf w/ MJ and KES re putative class member files.	0.4	
8/31/2021	GCG	Draft release for CM files.	0.4	
8/31/2021	GCG	Review 5th document request.	0.2	
8/31/2021	GCG	Email GW re mediation preparation.	0.1	
8/31/2021	GCG	Interview putative class member WL and RS.	0.9	
8/31/2021	GCG	Email CW and JY re same.	0.2	
8/31/2021	BBK	Conferring w/ co-counsel re request for class member declarant files from BD.	0.1	
8/31/2021	AX	Review team correspondence re release of putative class member documentation.	0.1	
8/31/2021	AX	Call with putative class member at Scotts Valley re update on case.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/31/2021	EH	Drafting form re release of protected health information for putative class members.	0.6	
9/1/2021	GCG	Confs w/ and emails to GW and MJ re class member outreach and overall strategy.	0.6	
9/1/2021	GCG	Email to GW re mediation plan.	0.1	
9/1/2021	GCG	Email to MJ re putative class member files.	0.1	
9/1/2021	GCG	Confs w/ and emails to CW re class member outreach.	0.2	
9/1/2021	GCG	Conf w/ WD re San Ramon issues.	0.2	
9/2/2021	GCG	Confs w/ CW and TC and emails to team re class member outreach.	0.4	
9/2/2021	GCG	Conf w/ and email to declarant WD re San Ramon issues.	0.5	
9/2/2021	GCG	Email to GW re mediation preparation.	0.1	
9/2/2021	GCG	Research and draft memo to file re local facilities and declarants.	0.5	
9/2/2021	GCG	Email to JSY and RS re putative class member contacts and files.	0.1	
9/2/2021	GCG	Email to class rep ML.	0.1	
9/2/2021	BBK	reviewing comm'ns w/ co-counsel re class declarants.	0.1	
9/2/2021	JSY	Emails re declarant contact information.	0.2	
9/3/2021	GCG	Research re Bay Area facilities for class member outreach.	0.3	
9/3/2021	GCG	Emails to BBK and team re same.	0.1	
9/3/2021	GCG	Emails to ML, CW and WD re same.	0.2	
9/3/2021	GCG	Email to MJ, defendants and team re requests for putative class member files.	0.2	
9/3/2021	BBK	Conferring w/ co-counsel and RBGG re declarants from Bay Area Brookdale facilities.	0.1	
9/3/2021	BBK	Updating list of declarants from Bay Area Brookdale facilities.	0.2	
9/3/2021	AX	Review team correspondence re case tasks and miscellaneous topics.	0.3	
9/4/2021	GCG	Email to Ax and team re outreach to putative class members.	0.1	
9/4/2021	GCG	Email to putative class member re POA and related documents.	0.1	
9/5/2021	GCG	Email to GW, KS and MJ re preparation for mediation.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 486

SERVICES

Date	Person	Description of Services	Hours	Discount
9/6/2021	GCG	Conf w/ CW and emails to WD re class member outreach and issues.	0.5	
9/6/2021	GCG	Prepare for mediation.	0.3	
9/6/2021	GCG	Draft memo to partners re same.	0.3	
9/6/2021	GCG	Emails to GW and MJ re same.	0.3	
9/7/2021	GCG	Review and analyze expert report on Brookdale operations.	0.2	
9/7/2021	GCG	Prepare for and conduct call w/ co-counsel to discuss mediation brief and strategy.	0.7	
9/7/2021	GCG	Emails to JSY and team re same.	0.3	
9/7/2021	GCG	Emails w/ CW and declarants re various.	0.3	
9/7/2021	GCG	Review defendant's requested sealing in Vick declaration.	0.3	
9/7/2021	GCG	Email to MJ and team re same.	0.2	
9/7/2021	BBK	reviewing comm'ns w/ co-counsel re prep for mediation.	0.1	
9/7/2021	BBK	conferring w/ RBGG team re identifying additional class declarants for reply brief.	0.1	
9/7/2021	BBK	Reviewing comm'ns w/ co-counsel re records requests to BD OBO class declarants.	0.1	
9/7/2021	BBK	Reviewing Decl of J. Vick ISO Admin Motion to Seal and Proposed Order; conferring w/ co-counsel and RBGG team re same.	0.2	
9/7/2021	JSY	Emails re mediation brief.	0.1	
9/7/2021	AX	Review team correspondence re mediation, P. Kennedy memo, Brookdale sealing filings, discovery issues.	0.8	
9/8/2021	GCG	Emails to GW, JSY and team re mediation brief and strategy.	0.2	
9/8/2021	GCG	VM and email w/ CW re putative class member outreach.	0.1	
9/8/2021	BBK	Reviewing mediation documents.	0.1	
9/8/2021	BBK	Conferring w/ co-counsel re MTC ILO opposing counsel's refusal to produce missing assessment and move-out data prior to filing Opp to cert motion.	0.1	
9/8/2021	JSY	Review and edit mediation brief.	0.7	
9/8/2021	AX	Review team correspondence re requests for plaintiff/deponent resident files, assessment data and related discovery issues, plaintiffs' mediation letter to Judge Infante.	1.0	
9/8/2021	KES	Review emails re declarant doc requests and update electronic files.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 487

SERVICES

Date	Person	Description of Services	Hours	Discount
9/9/2021	BBK	Reviewing Pls' mediation statement.	0.3	
9/9/2021	BBK	Reviewing MJ-G.Maatman comm'ns re meeting and conferring re: Ps' record requests OBO class declarants.	0.1	
9/9/2021	AX	Call with potential putative class member re issues at San Diego facility and making related notes to file.	0.5	
9/9/2021	AX	Review team correspondence and letter brief re assessment data.	0.2	
9/9/2021	AX	Review team correspondence re requests for resident records.	0.2	
9/9/2021	AX	Review mediation letter.	0.5	
9/9/2021	KES	Update electronic files re declarant records.	0.2	
9/10/2021	GCG	Emails to MH re authorization form for file.	0.1	
9/10/2021	GCG	Emails to MJ and GM re disc. dispute.	0.1	
9/11/2021	GCG	Research and draft email to plaintiff ML re various.	0.3	
9/11/2021	GCG	Putative class member outreach and communications.	0.3	
9/13/2021	GCG	Prepare for mediation.	0.3	
9/13/2021	GCG	Emails to WD, CW and ML re class member outreach.	0.3	
9/13/2021	BBK	Reviewing MJ report re 9/10 M&C w/ Ds re request for resident-declarant BD files.	0.1	
9/13/2021	AX	Review team correspondence on discovery issues and other case tasks.	0.4	
9/13/2021	KES	Update records requests electronic files.	0.1	
9/14/2021	GCG	Prepare for mediation.	0.3	
9/14/2021	BBK	Reviewing communications in prep for mediation.	0.1	
9/14/2021	JSY	Emails re docs from ML.	0.1	
9/15/2021	GCG	Call w/ named plaintiff ML re various.	0.5	
9/15/2021	GCG	(Reduced Charge) Travel to participate in JAMS mediation w/ Brookdale.	0.2	0.2
9/15/2021	GCG	Follow up conferences w/ JSY and KES re same.	0.2	
9/15/2021	GCG	Emails to CW and team and conf w/ RS re putative class member outreach and declaration drafting.	0.7	
9/15/2021	GCG	Participate in JAMS mediation w/ Brookdale.	5.6	
9/15/2021	JSY	Conf. w/ GCG re mediation.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/15/2021	KES	Review emails re declarant documents.	0.3	
9/16/2021	GCG	Prepare for and meet w/ CW and ML.	1.0	
9/16/2021	GCG	Conf w/ CW and ML re same.	0.2	
9/16/2021	GCG	Emails to CW and WD re same.	0.2	
9/16/2021	GCG	Emails to JSY, EH and team re class member outreach.	0.4	
9/16/2021	GCG	Draft memos to file re mediation take aways and discovery priorities.	1.0	
9/16/2021	GCG	Emails w/ GW re mediation and litigation strategy.	0.2	
9/16/2021	GCG	Email to MJ and GW re deposition "errata".	0.1	
9/16/2021	KES	Email with L. Castro re depo transcript letter and review files re same.	0.2	
9/17/2021	GCG	Conf w/ and email to MH re interview and outreach.	0.5	
9/17/2021	GCG	Conf w/ JSY and email to EH re putative class member outreach.	0.4	
9/17/2021	GCG	Email w/ GW re legal research re class cert and impact of Burger King case.	0.1	
9/17/2021	AX	Review team correspondence re class member outreach and other case tasks.	0.4	
9/17/2021	EH	Finalizing correspondence to 83 declarants re photos of loved ones.	0.6	
9/18/2021	GCG	Email w/ witness MH re Fountaingrove issues.	0.2	
9/18/2021	GCG	Email w/ CW and JSY re class member outreach.	0.2	
9/20/2021	GCG	Review mediation brief and draft summary of cases.	1.6	
9/20/2021	GCG	Conf w/ witness MH re Fountaingrove issues.	0.5	
9/20/2021	GCG	Conf w/ JSY and EH and emails to CW re class member outreach.	1.0	
9/20/2021	GCG	Emails to GW re meeting to discuss ongoing legal research and class cert issues.	0.5	
9/20/2021	BBK	Reviewing MJ notes from 9/15 mediation and GCG report re: post-mediation discovery follow-up.	0.2	
9/20/2021	BBK	Reviewing comm'ns w/ co-counsel re outreach to class declarants re: docs and photos.	0.2	
9/20/2021	BBK	Reviewing comm'ns w/ opposing counsel re: M&C on outstanding discovery and Ds' request for supp expert production (and internal comm'ns re same).	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/20/2021	BBK	Reviewing comm'ns w/ co-counsel re proving BD corporate control over CA facilities.	0.1	
9/20/2021	BBK	Reviewing MJ draft letter to Ds objecting to improper errata sheets for deposition transcripts.	0.1	
9/20/2021	JSY	Emails with declarant.	0.1	
9/20/2021	JSY	Emails re class member outreach.	0.1	
9/20/2021	JSY	Conf. w/ GCG re same.	0.1	
9/20/2021	JSY	Emails re outline for same.	0.1	
9/20/2021	AX	Review correspondence from cocounsel and opposing counsel re expert disclosure information.	0.3	
9/20/2021	EH	Communication re declarants and organizing documents re same to file.	0.7	
9/20/2021	EH	Revising memo re history of Brookdale case.	0.4	
9/21/2021	GCG	Initial review of defendant's interrogatories and deposition requests.	0.2	
9/21/2021	GCG	Email to WM re photos of grandmother.	0.1	
9/21/2021	GCG	Meet w/ putative class member MH.	1.0	
9/21/2021	GCG	Prepare for and participate in NBC interview of MH and GCG.	2.2	
9/21/2021	GCG	Research and draft memo to file summarizing status of case.	1.0	
9/21/2021	GCG	Meet w/ CW and JSY re class member outreach.	0.5	
9/21/2021	GCG	Confs w/ KES and EH e same.	0.3	
9/21/2021	GCG	Conf w/ JC re status.	0.2	
9/21/2021	GCG	Email to MH re photos of MB.	0.2	
9/21/2021	BBK	Reviewing MJ-D.Marks comm'ns re missing assessment/PSS data and outreach to opposing counsel re same.	0.1	
9/21/2021	BBK	Conferring w/ GCG and C. Whitaker re key evidence from BBK Decl ISO class cert.	0.2	
9/21/2021	JSY	Emails re team meeting.	0.1	
9/21/2021	JSY	Meeting to prepare for GCG TV interview; observe same; emails re same.	1.5	
9/21/2021	EH	Calls with GCG re NBC press coverage tasks.	0.3	
9/21/2021	EH	Drafting summary of DSS analysis for GCG.	0.4	
9/21/2021	EH	Correspondence re declarant photos.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/21/2021	KES	Review putative class member and client documents and email team re photos.	0.6	
9/22/2021	GCG	Conf w/ putative class member re issues at Fountaingrove.	0.4	
9/22/2021	GCG	Emails to GW and MJ e DOJ litigation related to ADA and senior housing.	0.2	
9/22/2021	GCG	Email to GW re mediation.	0.1	
9/22/2021	GCG	Conf w/ EH and email to JSY re photographs of class members and outreach issues.	0.1	
9/22/2021	JSY	Emails re photos for TV.	0.1	
9/22/2021	EH	Call with GCG re declarant photos.	0.2	
9/23/2021	JSY	Emails re photos of residents.	0.1	
9/23/2021	JSY	Texts with JA re deposition.	0.1	
9/23/2021	KES	Organize photos for possible use.	0.2	
9/23/2021	KES	Calendar discovery response deadline.	0.1	
9/24/2021	GCG	Prepare for and conduct team meeting re ongoing class certification discovery issues and expert analysis.	1.3	
9/24/2021	JSY	Conf. w/ JA re deposition and ROG responses.	0.4	
9/24/2021	JSY	Conf. w/ GCG re case tasks.	0.1	
9/24/2021	JSY	Team meeting re case tasks.	1.1	
9/24/2021	AX	Attend team meeting re case tasks.	1.0	
9/24/2021	AX	Related correspondence w/ team re case tasks.	0.5	
9/24/2021	AX	Correspondence w/ team re named plaintiff depositions.	0.2	
9/24/2021	AX	Review team correspondence re discovery issues.	0.2	
9/24/2021	EH	Organizing to file photos from declarants.	0.3	
9/24/2021	KES	Zoom with co-counsel re depo prep and other tasks.	1.0	
9/25/2021	JSY	Emails re class member photos.	0.1	
9/27/2021	GCG	Review emails from JM and GW re document requests.	0.2	
9/27/2021	GCG	Conf w/ and emails to JSY and AX re planning for plaintiffs' depositions and insurance follow up.	0.2	
9/27/2021	BBK	Reviewing comm'ns w/ RBGG team re outreach to class declarants.	0.1	
9/27/2021	BBK	Reviewing interrogatories served by Ds.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/27/2021	BBK	Reviewing MJ-DM comm'ns re Ds' request for additional expert doc production.	0.1	
9/27/2021	BBK	Reviewing MJ-G.Maatman emails re meeting and conferring on missing data from prior productions, failure to produce responsive documents to Ps' RFP Set 4, and Ds' request for production of additional expert docs.	0.1	
9/27/2021	BBK	Reviewing Ds' request for deposition dates for Pls' experts and named Plaintiffs, and for supp disc resps.	0.1	
9/27/2021	BBK	Reviewing AX report re 9/24 co-counsel meeting on case strategy and updated case task list.	0.1	
9/27/2021	AX	Call w/ GCG and JSY re case tasks.	0.2	
9/27/2021	AX	Call w/ BU re plaintiff depositions.	0.7	
9/27/2021	AX	Review materials and draft skeleton outline.	2.0	
9/27/2021	KES	Review Relativity for named plaintiff files produced in discovery (os).	0.6	
9/28/2021	GCG	Emails to GW, MJ and team re expert discovery.	0.1	
9/28/2021	GCG	Prepare for and conduct meeting w/ JSY, BBK and AX re preparation for plaintiffs' depositions and work for reply brief.	0.6	
9/28/2021	GCG	Conf w/ and email to KES re plaintiffs' Brookdale files.	0.2	
9/28/2021	GCG	Review report on abuse at Brookdale Folsom; emails to team re same.	0.2	
9/28/2021	GCG	Conf w/ EH and email to MH re documents and other evidence.	0.1	
9/28/2021	BBK	Reviewing article re: elder abuse at BD Folsom and conferring w/ litigation team re same.	0.1	
9/28/2021	BBK	Meeting w/ RBGG team re case strategy and tasks.	0.7	
9/28/2021	BBK	Reviewing MJ emails re: M&C w/ Ds and re: scheduling depositions.	0.1	
9/28/2021	BBK	Emailing P. Lindstrom, J. Carlson and R. Carlson re depositions.	0.2	
9/28/2021	JSY	Emails re depositions and issues with resident files.	0.2	
9/28/2021	JSY	Meeting with GCG, AX, BBK re case tasks.	0.8	
9/28/2021	AX	Review legal research re class certification.	0.8	
9/28/2021	AX	Review team notes re mediation.	0.3	
9/28/2021	AX	Review team correspondence re discovery issues.	0.1	
9/28/2021	AX	Draft sample outline.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/28/2021	AX	Team strategy meeting re case tasks.	0.6	
9/28/2021	EH	Correspondence with Brookdale declarants re photos.	0.4	
9/28/2021	EH	Call with GCG re stories about Brookdale.	0.2	
9/29/2021	BBK	Conferring w/ P. Lindstrom re scheduling deposition.	0.2	
9/29/2021	BBK	Emailing JSY update re scheduling of P Lindstrom deposition.	0.2	
9/29/2021	BBK	Conferring w/ JSY and AX re outreach to named plaintiffs to schedule depositions.	0.1	
9/29/2021	JSY	Emails re deposition dates for class reps.	0.2	
9/29/2021	AX	Call w/ Bernie Jestrabek Hart re deposition scheduling and other case issues.	0.2	
9/29/2021	AX	Email correspondence w/ team re deposition scheduling.	0.2	
9/29/2021	AX	Email correspondence w/ team re resident files.	0.2	
9/29/2021	EH	Correspondence with declarants.	0.3	
9/29/2021	KES	Review files and database to determine status of all named plaintiff resident files and email team re same.	2.0	
9/30/2021	GCG	Emails to AX and team re class member deposition preparation.	0.1	
9/30/2021	BBK	Reviewing KES report re requests for named plaintiffs' resident files from BD.	0.1	
9/30/2021	BBK	Reviewing D. Marks - M. Johnson comm'ns re legal research on discovery of .mod and .pkg files.	0.1	
9/30/2021	BBK	Conferring w/ J. Carlson re J and R Carlson availability for depositions and depo prep.	0.3	
9/30/2021	BBK	Reporting to RBGG team re Carlsons' availability for depositions.	0.2	
9/30/2021	BBK	Reviewing AX-RS comm'ns re outreach to putative class members at BD Scotts Valley.	0.1	
9/30/2021	BBK	Reviewing MJ update re M&C on Ds' failure to produce omitted data from prior productions.	0.1	
9/30/2021	BBK	Conferring w/ co-counsel re plan for scheduling expert and named plaintiff depositions and defending same.	0.2	
9/30/2021	BBK	Conferring w/ JSY/AX/GCG re requesting additional availability from named Plaintiffs for depositions.	0.3	
9/30/2021	BBK	Conferring w/ P. Lindstrom and J. Carlson re additional availability for depositions.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/30/2021	BBK	Reviewing photographs rec'd from putative class member declarants and named plaintiffs.	0.1	
9/30/2021	BBK	Reviewing Ds' response to RFP seeking resident files of class members and conferring w/ co-counsel re same.	0.1	
9/30/2021	JSY	Multiple emails re scheduling class rep depos.	0.4	
9/30/2021	JSY	Review declarant photos; emails re same.	0.2	
9/30/2021	AX	Draft sample outline for named plaintiff and declarant depositions.	4.2	
9/30/2021	AX	Correspondence w/ named plaintiffs and team re deposition schedule.	0.5	
9/30/2021	AX	Review team correspondence re case issues.	0.5	
9/30/2021	AX	Correspondence w/ team re issues at Scotts Valley.	0.3	
9/30/2021	EH	Creating and compiling sharefile with declarant photos.	1.5	
9/30/2021	EH	Correspondence with declarants.	0.3	
10/1/2021	GCG	Gather loved one photos for class member outreach.	0.3	
10/1/2021	BBK	Drafting/sending proposed schedules for depositions of P. Lindstrom, J. Carlson and R. Carlson to RBGG team.	0.3	
10/1/2021	BBK	Reviewing AX proposed scheduled for depositions of B. Jestrabek-Hart and L. Vallette.	0.1	
10/1/2021	BBK	Reviewing T. Close notes re 10/1 meet and confer w/ Ds and MJ FU to D. Marks re same.	0.1	
10/1/2021	BBK	Reviewing MJ FU email to Ds memorializing agreements reached at 10/1 M&C.	0.1	
10/1/2021	BBK	Reviewing MJ draft Joint Discovery Letter Brief re failure to produce docs IRT Pls' 4th Set of RFPs.	0.1	
10/1/2021	JSY	Draft supp ROG and RPD responses for JA.	1.5	
10/1/2021	JSY	Emails re meet and confer and extension request by Defs.	0.1	
10/1/2021	JSY	Emails re depo dates.	0.1	
10/1/2021	JSY	Emails re photos from class members.	0.1	
10/1/2021	AX	Draft memo re preparing named plaintiffs for depositions and related correspondence w/ team.	3.0	
10/1/2021	AX	Email correspondence w/ team re deposition dates for Bernie-Jestrabek Hart and Loresia Vallette.	0.3	
10/1/2021	EH	Preparing and finalizing photos of declarants.	1.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/4/2021	GCG	Email to GW and team re defendant's request for extension of time on class cert opp.	0.1	
10/4/2021	BBK	Reviewing AX memo re topics for named Plaintiff deposition prep.	0.3	
10/4/2021	BBK	Reviewing JSY proposed deposition schedule for class reps.	0.1	
10/4/2021	BBK	Reviewing Ds' proposed stipulation for EOT for Ds to file Opposition to Class Cert Motion; conferring w/ co-counsel re same.	0.1	
10/4/2021	JSY	Emails with ML re depo dates.	0.1	
10/4/2021	JSY	Emails re depo schedule for class reps.	0.2	
10/5/2021	GCG	Conf w/ JSY and emails to MJ and GW re approach to class cert discovery and defendant's request for extension.	0.3	
10/5/2021	GCG	Email w/ BBK re research into potentially relevant bill.	0.1	
10/5/2021	GCG	Email to MH and Cw re class member outreach.	0.1	
10/5/2021	BBK	Researching recently signed law AB 1042 to assess impact on case and reporting to GCG re same.	0.3	
10/5/2021	BBK	Conferring w/ JSY re changes to proposed deposition schedule for class reps.	0.1	
10/5/2021	BBK	Conferring w/ J Carlson re planned proposal for her and R. Carlson's depositions.	0.1	
10/5/2021	BBK	Reviewing MJ comm'ns w/ opposing counsel re scheduling expert depositions.	0.1	
10/5/2021	BBK	Conferring w/ JSY and co-counsel re Ds' proposed stipulation for EOT to file opp to class cert motion.	0.2	
10/5/2021	BBK	Conferring w/ litigation team re finalizing proposal for deposition schedule for class reps.	0.1	
10/5/2021	BBK	Reviewing JSY update re supplemental ROG/RFP responses and doc production by Algarme.	0.1	
10/5/2021	BBK	Reviewing G. Maatman - M. Johnson comm'ns re production of expert materials and comm'ns w/ co-counsel re same.	0.1	
10/5/2021	JSY	Emails re depo schedule.	0.2	
10/5/2021	JSY	Review proposed stip re extension; multiple calls and emails re same.	0.3	
10/5/2021	JSY	Call with JA re discovery responses.	0.8	
10/5/2021	JSY	Draft ROG responses for JA and search for responsive documents.	1.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 495

SERVICES

Date	Person	Description of Services	Hours	Discount
10/6/2021	GCG	Emails to GW re approach to defendant's request for extension to class cert opposition.	0.1	
10/6/2021	GCG	Emails to MJ, JSY and team re expert and class member deposition schedule.	0.1	
10/6/2021	GCG	Email to MH re class/member/declaration outreach.	0.1	
10/6/2021	BBK	Reviewing comm'ns w/ opposing counsel re scheduling expert and class rep depositions.	0.1	
10/6/2021	BBK	Updating P. Lindstrom re proposed schedule for her deposition.	0.1	
10/6/2021	BBK	Reviewing MJ response to Ds re requested EOT to oppose class cert motion and red-lined stipulation re same.	0.1	
10/6/2021	BBK	Reviewing comm'ns w/ co-counsel re addressing Ds' section of joint letter brief re discovery of contracts relating to BD ownership of CA facilities.	0.1	
10/6/2021	JSY	Emails re class rep depo schedule.	0.2	
10/6/2021	JSY	Draft Supp. ROG responses for JA; emails re same.	1.0	
10/7/2021	GCG	Emails to MJ, JM and team re joint letter brief.	0.1	
10/7/2021	BBK	Conferring w/ RBGG litigation team re recent opinion on franchiser liability under Title III of ADA.	0.2	
10/7/2021	BBK	Reviewing MJ comm'ns w/ opposing counsel re scheduling expert depositions.	0.1	
10/7/2021	BBK	Conferring w/ P. Lindstrom re deposition date and deposition prep.	0.1	
10/7/2021	BBK	Conferring w/ EH re updating BBK class cert declaration w/ DSS citations issued to CA facilities post-class cert motion.	0.2	
10/7/2021	EH	Revising PDF documents produced by named plaintiff and organizing to file for supplemental rog responses.	0.5	
10/8/2021	GCG	Team meeting to plan for depositions and additional discovery.	0.9	
10/8/2021	GCG	Email to KS and GW re defendant's request for extension.	0.1	
10/8/2021	BBK	Conferring w/ co-counsel re opposing Ds' request for in-person depositions during pandemic.	0.1	
10/8/2021	BBK	Reviewing JSY redlines to AX memo re topics for class rep depositions; conferring w/ JSY re same.	0.1	
10/8/2021	BBK	Meeting w/ co-counsel re defending depositions and discovery needed for reply ISO class cert.	1.0	
10/8/2021	BBK	Reviewing MJ emails w/ opposing counsel re production of MedModel files.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/8/2021	BBK	Conferring w/ team re finalizing supp discovery responses by Algarme and supp doc production.	0.1	
10/8/2021	BBK	Emailing w/ J. Carlson re logistics for depo prep.	0.1	
10/8/2021	BBK	Reviewing co-counsel comments on memo re topics for class rep depositions.	0.1	
10/8/2021	BBK	Reviewing revised joint discovery letter brief seeking production of docs establishing BD's ownership/operation of CA facilities.	0.2	
10/8/2021	JSY	Meeting with co counsel re case tasks.	1.0	
10/8/2021	JSY	Edit memo re depo prep.; emails re same.	0.5	
10/8/2021	JSY	Emails re updating discovery responses.	0.3	
10/8/2021	KES	Zoom meeting with co-counsel re upcoming depositions and discovery.	1.2	
10/9/2021	GCG	Email MJ and team re expert and plaintiff deposition schedule.	0.1	
10/10/2021	BBK	Conferring w/ J. Carlson re PC re deposition prep.	0.1	
10/11/2021	GCG	Review defendant's motion for extension of time.	0.1	
10/11/2021	GCG	Email to GW and MJ re response to same.	0.1	
10/11/2021	BBK	Preparing for call w/ J. and R. Carlson.	0.2	
10/11/2021	BBK	Phone call w/ J. and R. Carlson re depositions.	0.8	
10/11/2021	BBK	Conferring w/ JSY re depo prep sessions w/ clients.	0.1	
10/11/2021	BBK	Reviewing Ds' motion for extension of time to oppose class cert.	0.2	
10/11/2021	KES	Download and circulate motion and calendar deadlines re same.	0.2	
10/12/2021	GCG	Emails w/ team re court hearing on defendant's motion for extension, preparing for plaintiffs' depositions and DSS citations for Folsom beating.	0.4	
10/12/2021	BBK	Conferring w/ JSY and co-counsel re opposing Ds' motion for EOT to respond to class cert motion.	0.1	
10/12/2021	BBK	Conferring w/ RBGG team re DSS citations documenting staff misconduct by BD employees at CA facilities.	0.2	
10/12/2021	BBK	Reviewing MJ email to G. Maatman re M&C over dispute over production of expert docs and email w/ D. Marks re same.	0.1	
10/12/2021	JSY	Emails re CMC set by judge.	0.1	
10/12/2021	JSY	Emails re Supp. ROG responses for JA; edit same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 497

SERVICES

Date	Person	Description of Services	Hours	Discount
10/12/2021	JSY	Emails re complaints for Reply ISO class cert.	0.1	
10/12/2021	KES	Online research re BKD Folsom citation and email team re same.	0.3	
10/13/2021	GCG	Conf w/ JSY re MJ's revisions to plaintiffs' discovery requests.	0.1	
10/13/2021	GCG	Email to BBK re plaintiff deposition preparation.	0.1	
10/13/2021	BBK	Reviewing comm'ns w/ opposing counsel re scheduling expert depositions.	0.1	
10/13/2021	BBK	Conferring w/ GCG re setting deposition prep session w/ H Carlson and R Carlson.	0.1	
10/13/2021	BBK	Reviewing B. Umpierre memo re likely deposition questions for class reps.	0.2	
10/14/2021	GCG	Emails to MH, CW and EH re class member outreach and history.	0.3	
10/14/2021	GCG	Review and comment on opposition to extension of time.	0.4	
10/14/2021	BBK	Reviewing G. Maatman email rejecting dates proposed for depositions of named Ps and experts.	0.1	
10/14/2021	BBK	Conferring w/ KES re locating venue for depo prep w/ Carlsons and assessing options.	0.4	
10/14/2021	BBK	Reviewing/commenting on draft opposition to Ds' motion for 3-month EOT to file opposition to class cert.	0.2	
10/14/2021	JSY	Emails and texts with JA re ROG responses; edit same.	0.5	
10/14/2021	JSY	Emails and conf. re Opp to Admin Mtn.	0.2	
10/14/2021	KES	Research locations near Sebastopol to conduct depo prep meetings with Carlson and emails and tcs with First Legal and potential locations re same; confer BBK re same.	1.5	
10/15/2021	BBK	Reviewing revised opposition to Ds' motion for EOT to file class cert opposition and supporting declaration.	0.2	
10/15/2021	BBK	Reviewing comm'ns re serving supplemental Algarme discovery responses and supp doc production.	0.1	
10/15/2021	BBK	Conferring w/ KES re booking location for depo prep session w/ Carlsons.	0.1	
10/15/2021	BBK	Reviewing G. Maatman M&C email re expert files and co-counsel comm'ns re same.	0.1	
10/15/2021	BBK	Updating J. Carlson re deposition and depo prep.	0.2	
10/15/2021	JSY	Emails re depo prep.	0.1	
10/15/2021	JSY	File and serve supp. ROG responses from JA.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/15/2021	JSY	Emails re doc production of JA docs.	0.1	
10/15/2021	KES	Prepare POS, finalize and serve Algarme supplemental responses.	0.4	
10/15/2021	KES	Confirm depo prep location for Carlson and cancel duplicate booked site.	0.5	
10/15/2021	KES	Download and circulate opposition to Defs motion.	0.2	
10/18/2021	GCG	Prepare for hearing on defendant's request for extension.	0.2	
10/18/2021	GCG	Email GW, MJ and AX re same.	0.1	
10/18/2021	BBK	Reviewing MJ-DM comm'ns re meeting and conferring w/ Ds re expert files; reviewing MJ-opposing counsel comm'ns re expert depositions.	0.1	
10/18/2021	BBK	Conferring w/ co-counsel re finalizing discovery letter brief.	0.1	
10/18/2021	BBK	Conferring w/ JSY and AX re meeting on status of BD projects.	0.1	
10/18/2021	BBK	Meeting w/ JSY and AX re defending depositions of Ps and experts.	0.5	
10/18/2021	BBK	Conferring w/ J. Carlson re deposition.	0.2	
10/18/2021	JSY	Meeting with BBK and AX re status of case and depositions.	0.5	
10/18/2021	AX	Review team correspondence and recent pleadings.	0.8	
10/18/2021	AX	Call with JSY and BBK re client depositions and other case issues.	0.5	
10/19/2021	GCG	Conf w/ GW and MJ re preparation for CMC w/ Judge Gilliam and defendants re request for extension.	0.5	
10/19/2021	GCG	Prepare for and appear at CMC.	0.4	
10/19/2021	GCG	Conf w/ GW and MJ re drafting stipulation in accordance w/ court's instructions and expert depositions.	0.5	
10/19/2021	GCG	Research and draft stipulation.	0.8	
10/19/2021	GCG	Confer w/ co-counsel re same.	0.2	
10/19/2021	GCG	Draft email to GM and defendants' counsel re stipulation.	0.2	
10/19/2021	GCG	Confs w/ JSY, AX and KES re plan for depositions.	0.2	
10/19/2021	GCG	Email to AX and team re sealing motion.	0.1	
10/19/2021	SJR	GG update email.	0.1	
10/19/2021	BBK	Reviewing comm'ns w/ co-counsel re scheduling expert depositions and joint discovery letter brief on dispute over expert files.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/19/2021	BBK	Conferring w/ KES re canceling depo prep session w/ Carlsons ILO Ds' rejection of depo dates.	0.1	
10/19/2021	BBK	Conferring w/ J. Carlson re canceling depo prep session w/ Carlsons ILO Ds' rejection of depo dates.	0.1	
10/19/2021	BBK	Reviewing MJ memo and report re facts supporting BD ownership/operation of CA BD facilities.	0.2	
10/19/2021	BBK	Conferring w/ AX and JSY re hearing on Ds' motion for extension of time to oppose class cert.	0.1	
10/19/2021	BBK	Reviewing GCG report re hearing and comm'ns w/ co-counsel re stipulation re briefing schedule for class cert ILO today's hearing.	0.1	
10/19/2021	JSY	Emails and conf. re CMC and extension request stipulation; review same.	0.5	
10/19/2021	AX	Observe case management conference before Judge Gilliam and communication with JSY, BBK afterwards.	0.5	
10/19/2021	AX	Email correspondence w/ team re administrative motion to seal and follow up.	0.4	
10/19/2021	KES	Cancel depo prep room reservation.	0.1	
10/19/2021	KES	Download and circulate pleading.	0.1	
10/20/2021	GCG	Confs w/ JG and KES and emails to GW and team re stipulation and order re extension of time.	0.2	
10/20/2021	GCG	Oversee e-filing of stipulation and order.	0.1	
10/20/2021	GCG	Email to JG and GW re deposition schedule changes.	0.1	
10/20/2021	BBK	Emailing w/ RBGG team re negotiating schedule for named plaintiff depositions.	0.2	
10/20/2021	BBK	Reviewing GCG-G. Maatman comm'ns re finalizing and filing stipulation for briefing schedule on Ds' opp and Ps' Reply for class cert.	0.1	
10/20/2021	FGL	(Billing Judgment) Email from/to GCG re stipulation/proposed order and format/finalize same for efiling.	0.0	0.1
10/20/2021	KES	Finalize and email stipulation and proposed order; email order to judge.	0.4	
10/21/2021	BBK	Reviewing Ds' draft discovery letter brief re dispute over format of expert files; reviewing comm'ns w/ opposing counsel re scheduling expert depos.	0.1	
10/21/2021	BBK	Conferring w/ P. Lindstrom re depo prep.	0.2	
10/21/2021	BBK	Reviewing Pls' Responses to Second Sets of ROGS to Stiner, Lindstrom, and Jestrabek-Hart.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 500

SERVICES

Date	Person	Description of Services	Hours	Discount
10/21/2021	KES	Download and circulate order re class cert and calendar new deadlines re same.	0.5	
10/21/2021	KES	Review expert depo notice and calendar depo date.	0.2	
10/21/2021	KES	Review status of depositions.	0.2	
10/22/2021	BBK	Conferring w/ P. Lindstrom re deposition preparation.	0.1	
10/22/2021	BBK	Conferring w/ co-counsel re team meeting on depositions and discovery.	0.1	
10/22/2021	BBK	Conferring w/ JSY and AX re follow-up w/ co-counsel re plan for setting plaintiffs' depositions.	0.1	
10/22/2021	BBK	Reviewing Ps' portion of joint letter brief re Ds' demand for production of unprotected expert files.	0.1	
10/22/2021	BBK	Reviewing comm'ns re finalizing/serving supp doc production of Algarme e-mails.	0.1	
10/22/2021	JSY	Emails re team meeting.	0.2	
10/22/2021	JSY	Emails re class rep. depo schedule.	0.1	
10/22/2021	AX	Email correspondence w/ team re case issues and plaintiff depositions.	0.3	
10/23/2021	BBK	Conferring w/ JSY and G. Wallace re scheduling Plaintiffs' depositions.	0.2	
10/23/2021	JSY	Emails re depo schedule for class reps.	0.1	
10/25/2021	BBK	Conferring w/ co-counsel and JSY/AX re obtaining confirmation from Ds re class rep deposition dates.	0.2	
10/25/2021	BBK	Reviewing court's order on discovery dispute over BD ownership docs withheld by Ds.	0.1	
10/25/2021	KES	Download and circulate pleadings and email team re same.	0.5	
10/26/2021	GCG	Confs w/ JSY and AX re deposition plan.	0.2	
10/26/2021	GCG	Emails to GW, MJ and team re same.	0.2	
10/26/2021	GCG	Review court order re class cert schedule.	0.1	
10/26/2021	BBK	Conferring w/ AX re depo prep for class reps.	0.1	
10/26/2021	BBK	Reviewing MJ-opposing counsel comm'ns re meeting and conferring per Court Order on discovery letter brief and re scheduling expert depos.	0.1	
10/26/2021	BBK	Conferring w/ co-counsel and JSY/AX re meeting on case strategy.	0.1	
10/26/2021	BBK	Conferring w/ co-counsel and JSY/AX re FU w/ opposing counsel re setting deposition dates.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 501

SERVICES

Date	Person	Description of Services	Hours	Discount
10/26/2021	BBK	Reviewing AX-G.Maatman emails re setting class rep depo dates and conferring w/ team re same.	0.2	
10/26/2021	JSY	Conf. w/ GCG re status of case tasks and deposition schedule.	0.2	
10/26/2021	JSY	Emails and calls re Aegis tasks times; research same.	0.3	
10/26/2021	JSY	Emails and meeting re deposition schedule and prep for client depositions.	1.0	
10/26/2021	AX	Email correspondence w/ team re plaintiff deposition dates and related issues.	0.7	
10/26/2021	AX	Team meeting with GW, MJ, RS, JSY to discuss plaintiff deposition dates and related prep issues.	0.5	
10/26/2021	KES	Zoom with co-counsel re depo prep.	0.4	
10/27/2021	BBK	Conferring w/ co-counsel/JSY/AX re prepping named plaintiffs for depositions.	0.2	
10/27/2021	BBK	Prep for phone meeting w/ P. Lindstrom re deposition.	0.1	
10/27/2021	BBK	Phone meeting w/ P. Lindstrom re deposition.	0.7	
10/27/2021	BBK	Emailing w/ G. Wallace re setting final depo prep session w/ P. Lindstrom in advance of 11/16 depo.	0.1	
10/27/2021	BBK	Conferring w/ KES re locating/booking conference rooms for depo prep sessions w/ P. Lindstrom in advance of 11/16 depo.	0.2	
10/27/2021	BBK	Reviewing MJ email to Ds re scheduling court-ordered meet and confer on production of BD ownership records.	0.1	
10/27/2021	BBK	Reviewing G. Maatman email requesting new depo dates for plaintiffs in January.	0.1	
10/27/2021	JSY	Multiple emails and conf. re depo schedule and depo prep.	0.5	
10/27/2021	JSY	Review depo prep documents; emails re same.	0.3	
10/27/2021	AX	Email correspondence w/ team re plaintiff depositions.	0.5	
10/28/2021	BBK	Reviewing MJ emails to opposing counsel seeking production of putative CM declarant resident files and transportation policies about which 30b6 ADA designee testified.	0.1	
10/28/2021	BBK	Emailing w/ co-counsel re strategy for addressing Ds' request for new dates for class reps in January.	0.2	
10/28/2021	BBK	Meeting w/ co-counsel re class rep depositions.	0.4	
10/28/2021	BBK	Emailing w/ team re requesting supp production of resident files for named Ps.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/28/2021	BBK	Emailing w/ J. and R. Carlson re Ds' request for January depo availability.	0.2	
10/28/2021	BBK	Emailing w/ P. Lindstrom re Ds' request for January depo availability.	0.2	
10/28/2021	BBK	Reviewing/revising MJ's draft 5th Set of RFPs and conferring w/ MJ re same.	0.3	
10/28/2021	JSY	Emails and calls re depo schedule and prep.	0.5	
10/28/2021	AX	Call w/ BJH re deposition preparation and related case issues.	0.7	
10/28/2021	AX	Call w/ team to discuss meet and confer and discovery issues.	0.4	
10/28/2021	AX	Review email correspondence w/ team re discovery responses and RFPs.	0.2	
10/28/2021	KES	Team conference call re depos and follow up email re same.	0.4	
10/29/2021	BBK	Conferring w/ J. Carlson re R. and J. Carlson availability for January deposition.	0.1	
10/29/2021	BBK	Conferring w/ P. Lindstrom re availability for January deposition.	0.1	
10/29/2021	AX	Review email correspondence from team re discovery issues.	0.1	
11/1/2021	BBK	Drafting proposal re P Lindstrom and R Carlson depositions to RBGG team.	0.2	
11/1/2021	BBK	Reviewing Discovery Order re production of unlocked expert file and opposing counsel FU re same.	0.1	
11/1/2021	BBK	Reviewing MJ email to opposing counsel memorializing meet and confer re purported burden to produce docs demonstrating BD ownership of CA facilities.	0.1	
11/1/2021	KES	Download and circulate pleading.	0.1	
11/2/2021	GCG	Research number of class members.	0.3	
11/2/2021	GCG	Confs w/ JSY and emails to GW and team re expert deposition schedule, class rep depositions, declarant outreach and discovery order.	0.3	
11/2/2021	BBK	Conferring w/ JSY and co-counsel re proposing additional dates for Plaintiffs' depositions; reviewing comm'ns w/ opposing counsel re same.	0.2	
11/2/2021	JSY	Emails re class size; research same.	0.3	
11/2/2021	JSY	Emails re depo scheduling.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/2/2021	JSY	Draft and edit memo re depo prep.	2.0	
11/3/2021	GCG	Conf w/ JSY re draft deposition outline for plaintiffs' depositions.	0.1	
11/3/2021	BBK	Reviewing JSY-co-counsel comm'ns re 11/5 co-counsel meeting and preparing for P depositions.	0.1	
11/3/2021	BBK	Conferring w/ JSY re Pls' depositions.	0.1	
11/3/2021	JSY	Draft and edit memo re depo prep for clients; emails re same.	2.5	
11/3/2021	AX	Email correspondence w/ RB re Bernie Jestrabek Hart email production.	0.3	
11/3/2021	KES	Calendar deposition dates.	0.2	
11/4/2021	GCG	Conf w/ JSY and emails to GW, MJ and team re preparation for meet and confer and plaintiffs' depositions.	0.2	
11/4/2021	BBK	Reviewing MJ FU w/ Ds re inadequate/incomplete production of resident assessment data.	0.1	
11/4/2021	BBK	Reviewing GW tasklist re defending depositions and further discovery needed for reply ISO class cert.	0.1	
11/4/2021	BBK	Reviewing MJ emails w/ opposing counsel re dispute over purported burden of producing ownership docs for BD California facilities.	0.1	
11/4/2021	BBK	Reviewing MJ emails w/ opposing counsel re setting schedule for plaintiff and expert depositions.	0.1	
11/4/2021	JSY	Emails re class member outreach efforts and declarant.	0.1	
11/4/2021	JSY	Emails re depo schedule.	0.2	
11/4/2021	JSY	T/Cs with JA re documents and depo prep.	0.6	
11/4/2021	JSY	Review case task list.	0.1	
11/4/2021	KES	Calendar expert depo dates.	0.2	
11/4/2021	KES	Draft chart re upcoming depositions.	0.5	
11/5/2021	GCG	Emails to MJ and defendants re meet and confer re burdensomeness issues.	0.2	
11/5/2021	GCG	Review MJ agenda for and TC recap of meet and confer w/ defendants.	0.2	
11/5/2021	GCG	Prepare for and conduct meeting w/ SW and Stebner firms to discuss discovery for reply and defending expert and class resp. depositions.	1.5	
11/5/2021	GCG	Follow up meeting w/ RBGG team to discuss legal and factual research needed.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/5/2021	GCG	Review notices of deposition served by new Brookdale counsel.	0.1	
11/5/2021	BBK	Reviewing T. Close notes from 11/5 M&C on discovery disputes and MJ memo re: follow-up needed.	0.2	
11/5/2021	BBK	Meeting w/ co-counsel re defending depositions and discovery/research in prep for reply ISO class cert.	1.6	
11/5/2021	BBK	Meeting w/ RBGG team re case strategy and priorities.	0.4	
11/5/2021	BBK	Conferring w/ R. Steyer re updating Pls' supplemental disclosures.	0.1	
11/5/2021	BBK	Reviewing JSY-R. Steyer comm'ns re revised script for calls w/ putative class members seeking declarations.	0.1	
11/5/2021	BBK	Reviewing MJ-opposing counsel comm'ns re draft joint letter brief on resolving dispute over purported burden in producing ownership agreements for CA facilities.	0.2	
11/5/2021	JSY	Team meeting re case tasks.	2.0	
11/5/2021	JSY	Research re corporate control issue; emails re same.	0.5	
11/5/2021	JSY	Emails re class member intake script.	0.1	
11/5/2021	JSY	Research re class list production issue; emails re same.	0.5	
11/5/2021	JSY	Multiple calls and texts with JA re producing additional documents; conf. w/ GCG and KES re same.	2.0	
11/5/2021	AX	Meeting with team re case tasks, depositions, and other issues for opposing class certification.	2.0	
11/5/2021	KES	Zoom meetings with team and co-counsel re upcoming case tasks, discovery, depositions.	1.9	
11/5/2021	KES	Review depo notices of two experts and email team re same.	0.2	
11/6/2021	JSY	Emails re class member and declarant outreach efforts.	0.1	
11/8/2021	GCG	Conf w/ AX re legal and factual research needed for corporate control issue.	0.2	
11/8/2021	GCG	Emails to MJ, JY and BBK re additional discovery and letter brief.	0.2	
11/8/2021	GCG	Initial review of proposed experts on corporate control.	0.1	
11/8/2021	GCG	Email to MJ and AX re same.	0.1	
11/8/2021	BBK	Reviewing M. Johnson - M. Jacobsen comm'ns re purported burden of producing BD docs re ownership of CA facilities.	0.1	
11/8/2021	BBK	Reviewing draft joint discovery letter brief re purported burden of producing BD docs re ownership of CA facilities.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/8/2021	BBK	Emailing P. Lindstrom re new deposition date.	0.1	
11/8/2021	BBK	Emailing J. and R. Carlson re new deposition date.	0.2	
11/8/2021	BBK	Analyzing existing sets of RFPs to ID any covering comm'ns w/ DSS re citations and drafting new RFP re same.	0.8	
11/8/2021	BBK	Drafting proposal to co-counsel re serving new RFP and M&C w/ Ds re obtaining responsive comm'ns w/ DSS re citations issued to CA BD facilities.	0.3	
11/8/2021	JSY	Draft letter brief re class list data; research re same; emails re same.	5.2	
11/8/2021	JSY	Review letter brief re operating agreements; emails re same.	0.2	
11/8/2021	AX	Email correspondence with RB re Bernie Jestrabek Hart emails for production.	0.4	
11/8/2021	AX	Review team correspondence re joint letter brief.	0.2	
11/8/2021	AX	Email correspondence with GCG, GW, MJ re expert on corporate unity issues.	0.1	
11/8/2021	KES	Update electronic files.	0.2	
11/9/2021	GCG	Confs w/ JSY and AX re approach to corporate control analysis.	0.5	
11/9/2021	BBK	Emailing w/ J. and R. Carlson re new depo date for R. Carlson and pre-depo meetings.	0.2	
11/9/2021	BBK	Reviewing JSY draft discovery letter brief re obtaining class list and conferring w/ co-counsel re same.	0.2	
11/9/2021	BBK	Reviewing MJ draft discovery letter brief seeking production of resident files of declarants.	0.1	
11/9/2021	BBK	Conferring w/ KES re logistical planning for Pls' depositions.	0.1	
11/9/2021	BBK	Reviewing M. Jacobson outreach re moving P. Lindstrom deposition date and conferring w/ co-counsel re same.	0.1	
11/9/2021	BBK	Emailing w/ P. Lindstrom re Ds' request to move depo date.	0.2	
11/9/2021	JSY	Edit letter brief re class list issue; multiple emails re same.	0.6	
11/9/2021	JSY	Conf and emails with AX re corporate control issues.	0.3	
11/9/2021	JSY	Review and save client documents; multiple conf. and emails re Algarme paper documents.	1.5	
11/9/2021	AX	Discuss plaintiff depositions, document production updates, and Brookdale corporate unity issues with JSY and GCG.	0.8	
11/9/2021	AX	Legal research re unity of interest issues.	1.3	
11/9/2021	AX	Annotate Kevin Bowman PMK topic #3 deposition transcript.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/9/2021	AX	Review Travis Close memo re owner/operator issues.	0.4	
11/9/2021	AX	Email correspondence w/ team re discovery requests.	0.1	
11/9/2021	KES	Download and circulate pleading.	0.1	
11/9/2021	KES	Download, review and organize Algarme text messages for upload to Relativity.	1.0	
11/9/2021	KES	Research potential depo locations near Scotts Valley.	2.3	
11/9/2021	KES	Follow up re Cross depo transcript.	0.1	
11/10/2021	BBK	Reviewing MJ emails w/ opposing counsel re: SDTs to Pls' experts and supp production of Pls' resident files.	0.1	
11/10/2021	BBK	Reviewing MJ draft discovery letter brief re production of local transportation policies.	0.1	
11/10/2021	BBK	Conferring w/ P. Lindstrom re Ds' request for new depo date.	0.2	
11/10/2021	BBK	Conferring w/ MJ re FU w/ Ds to change P. Lindstrom depo date.	0.1	
11/10/2021	JSY	Conf. w/ ML re depo prep and documents.	0.4	
11/10/2021	JSY	Conf. and emails re depo prep. and document preservation issues.	0.3	
11/10/2021	JSY	Conf. w/ AX re corporate control issues; emails re same.	0.2	
11/10/2021	AX	Review team correspondence re letter brief.	0.2	
11/11/2021	GCG	Emails to MJ re document production and KES re class member outreach.	0.1	
11/11/2021	BBK	Reviewing MJ FU w/ Ds' re production of expert records IRT subpoenas; conferring w/ team re FU re Ds' portions of draft joint discovery letter briefs.	0.1	
11/11/2021	JSY	Emails re letter briefs.	0.1	
11/11/2021	JSY	Review white paper re insurance issues and email team.	0.2	
11/11/2021	JSY	Conf and emails re JA documents; review and redact same.	2.5	
11/11/2021	AX	Draft memo re expert witnesses for class certification reply brief.	0.5	
11/12/2021	GCG	Conf w/ CW and emails to ML and team re declarant outreach efforts.	0.5	
11/12/2021	GCG	Con w/ MJ and AX re discovery and expert testimony on ownership and control.	0.8	
11/12/2021	BBK	Reviewing NBC Bay Area story on Brookdale.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 507

SERVICES

Date	Person	Description of Services	Hours	Discount
11/12/2021	BBK	Conferring w/ litigation team re impact on litigation of BD comments for NBC Bay Area story.	0.1	
11/12/2021	BBK	Conferring w/ litigation team re responding to class member calls re BD after NBC Bay Area story.	0.1	
11/12/2021	BBK	Reviewing Ds' section of joint letter brief re production of resident files of class declarants.	0.1	
11/12/2021	BBK	Reviewing Ds' section of joint letter brief re production of class list and JSY revisions to Ps' section IRT same.	0.2	
11/12/2021	BBK	Reviewing R. Steyer draft supplemental disclosures.	0.2	
11/12/2021	BBK	Conferring w/ R. Steyer re including DSS citations in supplemental disclosures.	0.2	
11/12/2021	BBK	Conferring w/ KES re preparing additions to witness and doc list for supplemental disclosures.	0.1	
11/12/2021	JSY	Emails re NBC news story edit email to declarants re same.	0.5	
11/12/2021	JSY	Edit letter brief re class list; emails re same.	1.1	
11/12/2021	AX	Call with GCG and MJ re Brookdale owner/operator issues.	1.0	
11/12/2021	AX	Email correspondence w/ team re expert issues.	0.3	
11/12/2021	AX	Draft memo with research on owner/operator issues, background research on experts.	2.0	
11/12/2021	EH	Drafting and finalizing email to declarants.	0.5	
11/15/2021	GCG	Conf w/ JSY and emails to MJ and team re discovery dispute letter briefs and deposition preparation.	0.2	
11/15/2021	BBK	Reviewing B. Umpierre revisions to Pls' section of discovery letter brief re resident files.	0.1	
11/15/2021	BBK	Reviewing revised draft joint letter brief on local transportation policies w/ Ds' section and Pls' revisions IRT same.	0.1	
11/15/2021	BBK	Conferring w/ co-counsel and JSY re Ds' additional edits to their sections of joint letter briefs.	0.1	
11/15/2021	BBK	Conferring w/ RBGG team re intake calls from families of putative class members.	0.1	
11/15/2021	JSY	Conf. w/ GCG re status of document productions from clients.	0.1	
11/15/2021	JSY	Conf. w/ JA's son re paper documents for production.	0.2	
11/15/2021	JSY	Texts and emails re documents from JA storage unit.	0.5	
11/15/2021	JSY	Emails re calls from potential declarants.	0.2	
11/15/2021	JSY	Emails re letter brief re resident info.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/15/2021	JSY	Review text message production from JA.	0.1	
11/15/2021	JSY	LM for potential declarant.	0.1	
11/15/2021	AX	Call with Loresia Vallette re document production and deposition prep issues.	1.1	
11/15/2021	AX	Set up remaining deposition prep sessions with Loresia Vallette.	0.2	
11/15/2021	AX	Email correspondence w/ RB re Bernie Jestrabek-Hart emails.	0.2	
11/15/2021	AX	Calls with two putative class members re case, and potential declaration.	0.8	
11/15/2021	AX	Review email correspondence re letter brief on 5th set of RPD.	0.1	
11/15/2021	AX	Email correspondence w/ RS re sharepoint and documenting putative class member communications.	0.2	
11/15/2021	AX	Review email correspondence from team re letter brief re resident contact information.	0.1	
11/15/2021	AX	Review email correspondence re document review project on corporate control issues.	0.1	
11/16/2021	GCG	Email to GW and team re related case class cert decision.	0.1	
11/16/2021	GCG	Email to JSY and defendants re letter brief.	0.1	
11/16/2021	BBK	Conferring w/ JSY, AX and KES re intakes from Brookdale residents and family.	0.1	
11/16/2021	BBK	Reviewing emails re supp doc production and expert docs.	0.1	
11/16/2021	BBK	Conferring w/ team re issuance of class cert order in Sunrise case.	0.1	
11/16/2021	BBK	Reviewing comm'ns w/ opposing counsel re finalizing/filing joint discovery letter briefs.	0.1	
11/16/2021	JSY	T/C with AX re discovery issues and corporate control research.	0.5	
11/16/2021	JSY	Emails re letter brief.	0.2	
11/16/2021	JSY	Messages with JA's son re documents.	0.1	
11/16/2021	JSY	Review class cert order in Sunrise.	0.5	
11/16/2021	JSY	Emails re client document production issues; review client documents.	1.5	
11/16/2021	AX	Email correspondence with KES, RB, JSY re Bernie Jestrabek-Hart emails for production.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/16/2021	AX	Email correspondence w/ team re Brookdale putative class member calls.	0.3	
11/16/2021	AX	Email correspondence with KES re deposition space.	0.2	
11/16/2021	AX	Legal research and draft memo for expert on alter ego and corporate control issues.	0.5	
11/16/2021	AX	Review Defendants' second set of interrogatories to Ralph Schmidt.	0.1	
11/16/2021	AX	Review email correspondence re Flores and Schroyer subpoena responses.	0.1	
11/16/2021	AX	Review Sunrise class certification order as legal research for Brookdale.	0.3	
11/16/2021	AX	Review case task list in advance of 11/17 meeting.	0.1	
11/17/2021	EG	Attending to questions re shared CaseMap database for Brookdale.	0.4	
11/17/2021	GCG	Prepare for and conduct meeting w/ BU, SW and our team re deposition preparation and plaintiffs' reply.	1.0	
11/17/2021	BBK	Preparing for call w/ Carlsons re deposition.	0.1	
11/17/2021	BBK	Conferring by phone w/ Carlsons re deposition.	0.7	
11/17/2021	BBK	Reviewing AX report re pendant data.	0.1	
11/17/2021	BBK	Reviewing MJ-opposing counsel comm'ns re supplemental production of plaintiff resident files in advance of deposition.	0.1	
11/17/2021	JSY	Team meeting (1.0) and conf. w/ MJ and AX re depo schedules and messages with JA re same (.2).	1.2	
11/17/2021	JSY	Emails and messages re documents from JA.	0.4	
11/17/2021	JSY	Emails re letter briefs; finalize and file same.	0.6	
11/17/2021	JSY	Review class cert order in Sunrise case.	0.5	
11/17/2021	JSY	Emails and messages re depo schedule.	0.2	
11/17/2021	JSY	Conf. w/ GCG re Sunrise class cert and case status.	0.1	
11/17/2021	AX	Team meeting re case tasks and other issues re class certification reply, depositions.	1.2	
11/17/2021	AX	Email correspondence w/ team re pendant response data and related issues.	0.8	
11/17/2021	AX	Email correspondence re Bernie Jestrabek-Hart email production.	0.3	
11/17/2021	EH	Weekly call with co-counsel re named plaintiffs depositions, discovery, etc.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/18/2021	GCG	Conf w/ AX re plan for reply regarding owner/operator issue.	0.2	
11/18/2021	GCG	Run conflicts check on new opposing counsel and potential reply expert.	0.1	
11/18/2021	GCG	Review and analyze class cert schedule and filing plan.	0.1	
11/18/2021	BBK	Emailing w/ P. Lindstrom re case.	0.1	
11/18/2021	BBK	Conferring w/ KES re confirming J. Carlson email was already produced.	0.1	
11/18/2021	BBK	Conferring w/ KES re intake from former BD resident.	0.2	
11/18/2021	BBK	Conferring w/ KES re depo prep sessions w/ plaintiffs.	0.1	
11/18/2021	JSY	Review JA documents; emails re same.	0.4	
11/18/2021	AX	Call with GCG re expert issues and email correspondence re same.	0.2	
11/19/2021	GCG	Conf w/ BBK re preparation for plaintiffs' depositions.	0.1	
11/19/2021	GCG	Conf w/ KES and email to JSY and team re plaintiffs' document production.	0.1	
11/19/2021	BBK	Reviewing JSY-co-counsel comm'ns re December depositions of named Pls.	0.1	
11/19/2021	BBK	Conferring by phone w/ GCG re deposition prep for Plaintiffs.	0.1	
11/19/2021	JSY	Emails re deposition schedule.	0.2	
11/19/2021	JSY	Review JA documents; conf. w/ KES re production of same.	1.5	
11/19/2021	AX	Email correspondence re Bernie Jestrabek-Hart email search and production.	0.2	
11/19/2021	AX	Prepare for Bernie Jestrabek-Hart deposition preparation session, including discussions with KES.	0.8	
11/20/2021	GCG	Review, research and respond to MJ requests for information re defendants production of plaintiffs' files.	1.0	
11/21/2021	GCG	Emails to MJ and team re obtaining emails regarding our clients.	0.4	
11/21/2021	GCG	Review and analyze three pending discovery letter briefs.	0.5	
11/21/2021	GCG	Review and analyze expert disclosure.	0.3	
11/22/2021	GCG	Conf w/ AX and email to BBK, AX and JSY re preparation for meeting w/ SS re expert testimony.	0.3	
11/22/2021	GCG	Conf w/ KES re plaintiffs' files and defendants' production of same.	0.1	
11/22/2021	GCG	Meet w/ plaintiff BJH re her deposition.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 511

SERVICES

Date	Person	Description of Services	Hours	Discount
11/22/2021	GCG	Review and revise discovery requests.	0.2	
11/22/2021	GCG	Conf w/ and email to MJ re same.	0.2	
11/22/2021	GCG	Review Judge Beeler discovery order.	0.1	
11/22/2021	GCG	Email to KES re plaintiffs' discovery responses.	0.1	
11/22/2021	AX	Review client documents and prepare for deposition prep session.	1.0	
11/22/2021	AX	Video conference with Bernie Jestrabek Hart to prepare for deposition.	2.0	
11/22/2021	AX	Call with GCG re case tasks.	0.2	
11/22/2021	AX	Email correspondence with potential expert and team re meeting.	0.3	
11/23/2021	GCG	Conf w/ GW and MJ re settlement communications and need for co-counsel discussion.	0.3	
11/23/2021	AX	Review Bernie Jestrabek Hart documents for production and related email correspondence with RB and team.	2.0	
11/23/2021	AX	Prepare for next deposition prep session.	0.5	
11/24/2021	GCG	Emails to JSY and KES re plaintiff's document production.	0.1	
11/24/2021	JSY	Emails re document productions.	0.2	
11/24/2021	AX	Email correspondence and phone call w/ RB and team re document production and related issues (.5).	0.5	
11/29/2021	GCG	Conf w/ AX re alter ego issue and preparation for call w/ expert.	0.2	
11/29/2021	GCG	Zoom meeting w/ SS and QI re Brookdale claims not to own or operate facilities in CA.	0.7	
11/29/2021	GCG	Follow up conf w/ and emails to AX and MJ re same and re plan for hearing before Judge Beeler.	0.2	
11/29/2021	GCG	Emails to GW, MJ, AX and JSY re same and re case management statement and deposition preparation.	0.7	
11/29/2021	GCG	Review defendants' discovery responses.	0.2	
11/29/2021	BBK	Reviewing Court's 11/21 discovery order on pending discovery letter briefs.	0.1	
11/29/2021	BBK	Reviewing opposing counsel letter re in-person depositions.	0.1	
11/29/2021	BBK	Conferring w/ EH re BBK Reply Class Cert Declaration re DSS citations.	0.1	
11/29/2021	BBK	Conferring w/ co-counsel/RBGG team re M&C w/ Ds on Court-ordered statement on case schedule.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/29/2021	BBK	Conferring w/ co-counsel/RBGG team re Ds' objections and refusal to produce any docs IRT RFPs seeking named Plaintiffs' resident files to extent not already produced.	0.1	
11/29/2021	JSY	Multiple emails and messages re deposition schedule and resident files.	0.3	
11/29/2021	JSY	Emails re deposition prep.	0.1	
11/29/2021	JSY	Review RFP responses; emails re same.	0.2	
11/29/2021	AX	Prepare for meeting with SS re alter ego issues, including reviewing expert disclosures in prior cases.	1.0	
11/29/2021	AX	Meeting with SS, QT, GCG, MJ re alter ego and Brookdale ownership issues.	1.0	
11/29/2021	AX	Email correspondence with SS, GCG, MJ on follow up issues.	0.2	
11/29/2021	AX	Email correspondence and phone call with KES, RB re document production.	0.8	
11/29/2021	AX	Email correspondence w/ team re case tasks.	0.6	
11/29/2021	AX	Email correspondence with TC re 10-Ks.	0.1	
11/29/2021	AX	(Billing Judgment) Make travel and transportation arrangements for deposition prep in Scotts Valley for AX and plaintiff.	0.0	0.3
11/29/2021	AX	Email correspondence re Brookdale Alhambra class member and related documents.	0.2	
11/29/2021	KES	Return client document.	0.3	
11/29/2021	KES	(Billing Judgment) TC Paracruz re transportation for Bernie for depo and email AX re same.	0.0	0.4
11/29/2021	KES	Confer AX and R. Bonner re client document production and review and finalize Jestrabek-Hart documents.	2.3	
11/30/2021	GCG	Conf w/ JSY re discovery disputes and deposition preparation.	0.1	
11/30/2021	GCG	Review plaintiffs' and defendants' statements filed with the court.	0.2	
11/30/2021	GCG	Review multiple emails between GM, GW, MJ and team re ongoing discovery issues and preparation for plaintiffs' and expert depositions.	0.3	
11/30/2021	GCG	Review and comment on SS retainer agreement.	0.1	
11/30/2021	BBK	Conferring w/ co-counsel and RBGG team re disputes w/ Ds over court-ordered submission re case schedule.	0.1	
11/30/2021	BBK	Reviewing Ps and Ds separate submissions re case schedule.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/30/2021	BBK	Conferring w/ co-counsel re objections to deposition notices for named Ps.	0.1	
11/30/2021	JSY	Multiple conf. with GCG, BBK, AX re depo dates and discovery disputes; emails re same.	0.5	
11/30/2021	JSY	Review schedules filed with court.	0.1	
11/30/2021	AX	Review team correspondence re expert on alter ego issues.	0.2	
11/30/2021	AX	Review team correspondence on meet and confer efforts with Defendants and other issues.	0.3	
11/30/2021	AX	Meeting with Bernie Jestrabek-Hart re deposition.	1.7	
11/30/2021	AX	Review documents and prepare for Bernie Jestrabek-Hart deposition.	2.5	
11/30/2021	AX	Email correspondence re document production.	0.2	
12/1/2021	GCG	Prepare for and participate in team meeting re upcoming depositions and hearing before MJ.	1.3	
12/1/2021	GCG	Communications w/ expert SS, AX and KES re initial document review and retention.	0.5	
12/1/2021	GCG	Review defendants' response to deposition objections and offer to produce files.	0.1	
12/1/2021	GCG	Emails to AX, GW, MJ and JSY re next steps and client files.	0.4	
12/1/2021	BBK	Reviewing MJ emails w/ opposing counsel re Ds' refusal to M&C on producing Ps' resident files in advance of depositions.	0.1	
12/1/2021	BBK	Meeting w/ co-counsel re depositions and discovery disputes.	1.1	
12/1/2021	BBK	Reviewing AX proposed revisions to MJ draft objections to deposition notices of named Ps.	0.1	
12/1/2021	BBK	Conferring w/ co-counsel re opposing counsel's changed position on production of resident files for named Ps.	0.1	
12/1/2021	JSY	Team meeting re case tasks.	1.0	
12/1/2021	JSY	Multiple conf. and emails re deposition dates and discovery issues.	0.5	
12/1/2021	JSY	Conf with JA re depo date.	0.1	
12/1/2021	AX	Email correspondence w/ putative class member re claims at Brookdale Alhambra.	0.2	
12/1/2021	AX	Prepare for team meeting.	0.6	
12/1/2021	AX	Attend strategy meeting with GCG, MJ, GW, JSY, BBK, BU, TC re case issues.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/1/2021	AX	Send expert retainer agreement to SS, including related email and phone conversations with GCG, KC, KES.	0.5	
12/1/2021	AX	Additional conflict check information re SS.	0.1	
12/1/2021	AX	Email correspondence w/ team re Bernie Jestrabek-Hart document production.	0.1	
12/1/2021	AX	Draft letter brief re motion for protective order, including legal research.	3.5	
12/1/2021	AX	Email correspondence w/ team re Pls depositions and related issues.	0.6	
12/1/2021	KES	Zoom meeting with co-counsel re discovery and depos.	1.2	
12/1/2021	KES	Gather BKD SEC filings.	0.5	
12/1/2021	KES	Create Sharefile for expert and upload docs.	0.3	
12/1/2021	KES	Emails with R. Bonner re supplemental client production and confer JY re same.	0.4	
12/2/2021	GCG	Participate in portions of discovery hearing before MJ Beeler.	1.0	
12/2/2021	GCG	Confs w/ GW, MJ and JSY re same.	0.7	
12/2/2021	GCG	Draft and circulate notes from conference.	0.4	
12/2/2021	GCG	Emails to SS, MJ and AX re retention.	0.3	
12/2/2021	GCG	Email to EH re minute order.	0.1	
12/2/2021	BBK	Reviewing emails w/ opposing counsel re whether Ds will produce Ps resident files in advance of depositions.	0.1	
12/2/2021	BBK	Reviewing JSY/AX draft discovery letter brief seeking protective order against deposition of Ps until 7 days after production of resident files.	0.1	
12/2/2021	BBK	Reviewing Court's minute order on 12/2 discovery hearing.	0.1	
12/2/2021	BBK	Conferring w/ JSY and AX re 12/2 discovery hearing.	0.2	
12/2/2021	BBK	Reviewing GCG memo re 12/2 discovery hearing.	0.1	
12/2/2021	JSY	Depo prep meeting with JA.	2.0	
12/2/2021	JSY	Team call re depo schedule.	0.4	
12/2/2021	JSY	Edit letter brief re motion for protective order re depos.	0.8	
12/2/2021	JSY	Multiple calls and emails re discovery hearing.	0.5	
12/2/2021	JSY	Prep for Algarme deposition; document review re same.	2.6	
12/2/2021	AX	Email correspondence w/ Bernie Jestrabek-Hart re deposition.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/3/2021	BBK	Conferring w/ JSY and co-counsel re letter brief seeking protective order against Pls' depositions.	0.1	
12/3/2021	BBK	Conferring w/ JSY and AX re preparing clients for their depositions.	0.1	
12/3/2021	BBK	Conferring w/ JSY and AX re addressing Ds' demand to depose Pls in December notwithstanding delays in producing resident files.	0.2	
12/3/2021	BBK	Conferring w/ JSY/AX and co-counsel re analyzing production of resident files for Pls to assess completeness prior to agreeing to depositions of Ps going forward.	0.2	
12/3/2021	JSY	Multiple emails and calls re deposition schedule and document production; depo prep with JA re same.	2.2	
12/3/2021	AX	Email correspondence w/ RB, KES re production of Bernie Jestrabek-Hart documents.	0.2	
12/3/2021	AX	Call w/ Bernie Jestrabek-Hart re deposition prep.	0.5	
12/3/2021	AX	Email correspondence w/ team re price increases at Scotts Valley and related issues.	0.2	
12/3/2021	AX	Review team correspondence re missing assessment data.	0.1	
12/3/2021	AX	Email correspondence w/ team re Emeritus issues, including review of TAC and class cert motion.	0.4	
12/3/2021	AX	Confer w/ team re resident files and depositions.	0.4	
12/3/2021	AX	Review resident file production and related correspondence w/ team.	0.5	
12/3/2021	AX	Email correspondence w/ The Satellite in Felton re deposition space.	0.2	
12/3/2021	AX	Call with Bernie Jestrabek-Hart re deposition availability and related correspondence w/ team.	0.2	
12/4/2021	GCG	Emails and texts w/ GW, MJ, JSY and AX re defendants' production of documents related to named plaintiffs and follow up response to defendants.	0.7	
12/4/2021	BBK	Reviewing comm'ns w/ co-counsel re analysis of resident files produced for named Ps and strategy for going forward w/ Ps depos ILO incompleteness of same.	0.1	
12/4/2021	BBK	Reviewing MJ draft email to Ds re upcoming Ps depositions and JSY/AX comments on same.	0.1	
12/4/2021	JSY	Multiple emails and conf. re Defs' resident file production; review same re JA.	1.9	
12/4/2021	AX	Email correspondence w/ team, opposing counsel re deposition availability.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2021	AX	Review Bernie Jestrabek-Hart resident file and related correspondence w/ JSY.	1.6	
12/4/2021	AX	Draft email summary with analysis of resident file to team.	0.4	
12/4/2021	AX	Review team correspondence re deposition and resident file issues.	0.8	
12/5/2021	JSY	Arrangements for JA depo; messages re same.	0.2	
12/6/2021	GCG	Conf w/ JSY and email to JSY and AX re preparation for plaintiffs' depositions.	0.2	
12/6/2021	GCG	Conf w/ KES re same.	0.1	
12/6/2021	BBK	Conferring w/ JSY/AX/co-counsel re Pls' depositions.	0.1	
12/6/2021	JSY	Conf. w/ GCG re deposition prep.	0.4	
12/6/2021	JSY	Deposition prep for JA depo.	2.3	
12/6/2021	AX	Email correspondence w/ Bernie Jestrabek-Hart and team re revised deposition schedule.	0.5	
12/6/2021	AX	Prepare for deposition prep session with Bernie Jestrabek-Hart.	1.0	
12/6/2021	AX	Correspondence w/ team re case tasks.	0.4	
12/7/2021	GCG	Conf w/ JSY and AX re preparation for plaintiffs' depositions.	0.5	
12/7/2021	BBK	Reviewing JSY report re issues arising from depo prep for JA and Jestrabek-Hart.	0.1	
12/7/2021	JSY	Conf. w/ AX re depo prep.	0.2	
12/7/2021	JSY	Conf. w/ AX and GCG re depo prep issues.	0.4	
12/7/2021	JSY	Depo prep with JA.	1.5	
12/7/2021	JSY	Prepare for JA deposition.	1.5	
12/7/2021	AX	Deposition prep session with Bernie Jestrabek-Hart.	1.8	
12/7/2021	AX	Email correspondence and phone call with JSY, GCG re deposition logistics.	0.6	
12/7/2021	AX	Email correspondence with Bernie Jestrabek-Hart regarding deposition logistics.	0.2	
12/7/2021	AX	review documents to prepare for deposition.	1.0	
12/7/2021	AX	Correspondence w/ Brookdale Alhambra family member.	0.3	
12/7/2021	KES	Schedule Felton office space for client depo prep and depo and schedule transportation re same.	0.8	
12/7/2021	KES	Download and organize client files produced by Brookdale.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/8/2021	GCG	Emails to JSY, AX and team re document production related to plaintiffs' depositions.	0.1	
12/8/2021	GCG	Attend to expert retention.	0.1	
12/8/2021	BBK	Reviewing JSY/AX reports re Pls' supp doc production.	0.1	
12/8/2021	JSY	Prep for JA deposition; multiple emails and conf. Re same and re issues with JA document productions; review same.	3.8	
12/8/2021	AX	Email correspondence w/ team re service list.	0.1	
12/8/2021	AX	Review Brookdale produced documents re Bernie Jestrabek-Hart.	0.5	
12/8/2021	AX	Email correspondence w/ team re case tasks.	0.2	
12/8/2021	KES	Download, organize and review supplemental plaintiff productions and BKD supp production; confer AX and JY re plaintiff production issues.	3.0	
12/9/2021	GCG	Email to BBK and team re stipulation filed re expert depo schedule and plan.	0.1	
12/9/2021	BBK	Reviewing JSY and M. Johnson comm'ns w/ opposing counsel re Algarme and Stiner depositions on 12/11.	0.1	
12/9/2021	BBK	Conferring w/ RBGG team re stipulation re G. Waters deposition.	0.1	
12/9/2021	JSY	(Reduced Charge) Travel to JA residence for depo prep.	2.2	2.3
12/9/2021	JSY	Depo prep with JA.	4.3	
12/9/2021	JSY	Emails re exhibits for JA deposition.	0.2	
12/9/2021	AX	Preparing document binder for Bernie Jestrabek-Hart deposition prep session and related review of documents.	2.2	
12/9/2021	AX	Review email correspondence from team re stipulation.	0.1	
12/9/2021	AX	Email correspondence w/ MJ re depositions.	0.1	
12/9/2021	AX	Confer with JSY re deposition issues.	0.3	
12/9/2021	AX	Email correspondence w/ GW re Bernie Jestrabek-Hart deposition prep.	0.2	
12/9/2021	AX	Email correspondence w/ MJ, GCG, GW re documents for expert analysis (.2).	0.2	
12/9/2021	KES	Create Sharefile and email co-counsel with depo prep docs.	0.2	
12/9/2021	KES	Confer JY and AX re depo prep logistics.	0.6	
12/9/2021	KES	Update Felton office space reservation.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/9/2021	KES	Emails with R. Bonner re document production and review docs for production.	1.3	
12/10/2021	GCG	Review summary of Algarme deposition and text w/ JSY re same.	0.2	
12/10/2021	BBK	Reviewing JSY report re first day of Algarme deposition.	0.1	
12/10/2021	JSY	Emails re exhibits for JA deposition.	0.2	
12/10/2021	JSY	Set up for and defend JA deposition; conf. w/ JA during breaks.	5.0	
12/10/2021	JSY	Emails re summary of JA deposition.	0.1	
12/10/2021	JSY	(Reduced Charge) Travel home from JA deposition.	1.7	1.8
12/10/2021	AX	(Reduced Charge) Travel to Felton, CA.	0.8	0.7
12/10/2021	AX	In person depo prep session with Bernie Jestrabek-Hart.	7.0	
12/10/2021	AX	(Reduced Charge) Travel back to San Francisco.	0.7	0.8
12/10/2021	KES	Schedule transportation for client depo.	0.2	
12/10/2021	KES	Download and circulate pleading and calendar deadline.	0.1	
12/10/2021	KES	Review emails re depo.	0.1	
12/11/2021	JSY	Emails re JA deposition and prep for BJH deposition.	0.3	
12/12/2021	GCG	Email AX, JSY and team re preparation for plaintiffs' depositions.	0.1	
12/13/2021	GCG	Confs w/ and emails to AX re deposition of named plaintiff.	0.4	
12/13/2021	GCG	Emails to MJ and team re ADA issues raised in deposition.	0.2	
12/13/2021	BBK	Reviewing JSY and M Johnson updates re Algarme and Stiner depositions.	0.1	
12/13/2021	BBK	Conferring w/ GCG re FU w/ wife of BD Cortona Park former resident.	0.1	
12/13/2021	BBK	Reviewing report from wife of BD Cortona Park former resident and preparing for call re same.	0.2	
12/13/2021	BBK	Phone call w/ wife of BD Cortona Park former resident.	0.7	
12/13/2021	BBK	Drafting/sending report to RBGG litigation team re call w/ wife of BD Cortona Park former resident.	0.2	
12/13/2021	BBK	Emailing w/ wife of BD Cortona Park former resident re residency agreement and invoices.	0.1	
12/13/2021	AX	(Reduced Charge) Travel to Felton for deposition.	0.7	0.8

SERVICES

Date	Person	Description of Services	Hours	Discount
12/13/2021	AX	Defend deposition of Bernie Jestrabek-Hart and related discussions with client.	10.3	
12/13/2021	AX	(Reduced Charge) Travel back to San Francisco.	0.8	0.8
12/14/2021	GCG	Emails to JSY, AX and team re preparation for client depositions and meeting w/ SS's team.	0.2	
12/14/2021	BBK	Conferring w/ wife of former BD Cortona Park resident re mailing residency agreement and invoices.	0.1	
12/14/2021	BBK	Conferring w/ litigation team re docs being sent by wife of former BD Cortona Park resident.	0.1	
12/14/2021	BBK	Reviewing AX summary of key issues from Jestrabek-Hart depo.	0.1	
12/14/2021	BBK	Outreach to P. Lindstrom re plan for depo prep.	0.1	
12/14/2021	JSY	Conf. with GCG re depo videos; emails re same.	0.3	
12/14/2021	JSY	Emails re depo questions re public accommodation.	0.1	
12/14/2021	JSY	Emails re topics for client depos; review same.	0.4	
12/14/2021	JSY	Review JA depo transcript.	0.7	
12/14/2021	AX	Draft email summary of Bernie Jestrabek-Hart deposition to team.	0.8	
12/14/2021	AX	Correspondence w/ JSY re questions about BJH deposition and other case issues.	0.3	
12/14/2021	AX	Email correspondence w/ RB re Bernie Jestrabek-Hart email search terms and assistance with pulling Loresia Vallette emails.	0.6	
12/14/2021	AX	Email correspondence w/ QT re meeting about alter ego issues.	0.2	
12/15/2021	GCG	Confs w/ and emails to AX re preparation for meeting w/ expert.	0.2	
12/15/2021	GCG	Review AX and MJ comments on expert document request.	0.3	
12/15/2021	GCG	Conf w/ KES re plaintiffs' depositions, preparation and document production.	0.2	
12/15/2021	GCG	Email w/ JSY re court ordered discovery.	0.1	
12/15/2021	BBK	Conferring w/ P. Lindstrom re scheduling depo prep.	0.1	
12/15/2021	BBK	Emailing R. Carlson re deposition preparation plan.	0.2	
12/15/2021	BBK	Conferring w/ KES re depo prep for Carlson and Lindstrom depos.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/15/2021	BBK	Reviewing M. Johnson emails to opposing counsel re failure to produce docs as ordered by MJ Beeler and other outstanding discovery disputes.	0.1	
12/15/2021	BBK	Reviewing JSY and AX comm'ns re updating client depo memo based on first round of depos and obtaining transcripts.	0.1	
12/15/2021	JSY	Emails with ML re depo prep.	0.2	
12/15/2021	JSY	Emails re updating client depo prep memo and ordering transcripts.	0.3	
12/15/2021	JSY	Emails and conf. re JA document production issues.	0.7	
12/15/2021	JSY	Review JA depo transcript and prepare for part 2 of deposition.	2.5	
12/15/2021	AX	Review of expert preliminary information request and related correspondence w/ MTJ, GCG, GBW.	1.8	
12/15/2021	AX	Email correspondence w/ RB, KES re LV email searches.	0.2	
12/15/2021	AX	Email correspondence and related calls w/ QT, GCG, MJ re meeting about alter ego issues.	0.2	
12/15/2021	AX	Email correspondence w/ BBK re deposition logistics at Felton location.	0.1	
12/15/2021	AX	email correspondence w/ KES re Long Beach deposition logistics.	0.1	
12/16/2021	GCG	Participate in meeting w/ QT, MJ and AX re corporate control issue.	0.8	
12/16/2021	GCG	Follow up call w/ AX re documents for expert.	0.1	
12/16/2021	GCG	Conf w/ JSY re deposition preparation and motion to compel and/or enforce document production.	0.2	
12/16/2021	GCG	Emails to JSY and team re team meeting.	0.1	
12/16/2021	BBK	Conferring w/ RBGG team re receipt of residency agreement and other docs from wife of former BD Cortona Park resident and FU w/ her re same.	0.1	
12/16/2021	BBK	Reviewing residency agreement from wife of former BD Cortona Park resident.	0.1	
12/16/2021	BBK	Emailing w/ J Carlson re R Carlson depo prep plan.	0.2	
12/16/2021	JSY	Conf with GCG re case tasks and depositions.	0.3	
12/16/2021	JSY	Review documents re JA.	0.2	
12/16/2021	JSY	Review draft ROG responses; emails re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/16/2021	AX	Meeting with QT, MJ, GCG re document requests for corporate control/alter ego issues.	1.0	
12/16/2021	AX	Review documents as follow up to call with QT, MJ, GCG re alter ego analysis.	0.7	
12/16/2021	AX	Email correspondence w/ BU, MJ re Brookdale ownership chart.	0.2	
12/16/2021	AX	Email correspondence w/ TC re Schneider Wallace one drive access.	0.3	
12/16/2021	AX	Email correspondence w/ KES re expert document index.	0.2	
12/16/2021	AX	Email correspondence w/ RB re Loresia Vallette emails.	0.2	
12/17/2021	GCG	Conf w/ JSY re Algarme deposition issues.	0.1	
12/17/2021	GCG	Conf w/ and emails to AX re documents needed by expert on corp control.	0.1	
12/17/2021	GCG	Emails to GW, AX and team re team meeting.	0.1	
12/17/2021	BBK	conferring w/ AX re revising Pls supp initial disclosures.	0.1	
12/17/2021	JSY	(Reduced Charge) Travel to JA depo.	2.0	2.0
12/17/2021	JSY	(Reduced Charge) Travel to hotel from JA depo and send FedEx with exhibits.	0.2	0.3
12/17/2021	JSY	Conf. w/ GCG re JA depo.	0.1	
12/17/2021	JSY	Prep for JA depo; JA depo part 2.	6.0	
12/17/2021	JSY	Draft summary of JA depo.	0.4	
12/17/2021	AX	Email correspondence w/ BBK re supplemental initial disclosures.	0.2	
12/17/2021	AX	Email correspondence w/ KES re LV document searches.	0.2	
12/17/2021	AX	Email correspondence w/ RB re LV supplemental document production.	0.1	
12/17/2021	AX	Call with QT re documents for alter ego analysis.	0.4	
12/17/2021	AX	Email correspondence w/ team re meeting time and case tasks.	0.3	
12/17/2021	AX	Follow up work to call with QT, MJ, GCG re expert work, including review existing documents and draft memo to file re same.	2.3	
12/17/2021	AX	Review email correspondence from David Marks re Brookdale TN class complaint; email correspondence w/ TC and Veritext re coordinating depositions.	0.2	
12/18/2021	GCG	Emails to JSY and team re former Eds.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/18/2021	JSY	Emails re investigators.	0.1	
12/18/2021	AX	Email correspondence w/ team re case tasks.	0.2	
12/20/2021	GCG	Emails from and to expert SS.	0.1	
12/20/2021	GCG	Conf w/ witness MH.	0.1	
12/20/2021	GCG	Email w/ EH re KQED program on legislature reform needed for AL.	0.1	
12/20/2021	BBK	Conferring w/ co-counsel and JSY-AX re work w/ investigators to identify potential witnesses.	0.2	
12/20/2021	AX	Deposition prep session with LV.	1.5	
12/20/2021	AX	Review documents and prepare for meeting with LV.	0.3	
12/20/2021	AX	Call with Rachel Steyer and related correspondence with team re initial disclosures.	0.4	
12/20/2021	EH	review and summarize in memo to file relevant information from KQED special on nursing homes.	0.9	
12/22/2021	AX	Email correspondence w/ RB and KES re LV document production and review.	0.5	
12/22/2021	AX	Review correspondence from Brookdale re discovery issues.	0.3	
12/23/2021	GCG	Initial review of MJ report on discovery meet & confer.	0.1	
12/23/2021	BBK	Reviewing M. Johnson report on 12/22 meet and confer w/ Ds re outstanding discovery and disputes.	0.1	
12/24/2021	GCG	Review and analyze Brookdale chart of account definitions for use in expert reply declaration.	0.5	
12/24/2021	GCG	Review and comment on MJ report on ongoing meet & confer and discovery issues.	0.4	
12/24/2021	GCG	Review Mastin corrections to class certification declaration.	0.1	
12/24/2021	GCG	Emails MJ-GW re Brookdale control issues and motions to compel needed following up on meet & confer.	0.2	
12/24/2021	AX	Email correspondence re Brookdale unity of corporate interest issues.	0.2	
12/27/2021	GCG	Email with named plaintiff re status.	0.1	
12/28/2021	GCG	Conference with JSY and emails MJ-GW-AX re team meeting and discovery projects.	0.2	
12/28/2021	BBK	Conferring w/ KES re prep for P Lindstrom deposition.	0.1	
12/28/2021	BBK	Conferring w/ team re meeting w/ co-counsel on case priorities.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/28/2021	BBK	Conferring w/ co-counsel re depo transcripts from depositions taken by Ds.	0.1	
12/28/2021	JSY	Conf. w/ GCG re case status.	0.1	
12/28/2021	JSY	Emails with ML re depo prep.	0.1	
12/28/2021	JSY	Emails with JA re corrections to transcript; emails with team re same.	0.3	
12/28/2021	JSY	Review JA depo transcript; multiple emails re updating client prep memo and client depo transcripts.	1.8	
12/28/2021	AX	Email correspondence w/ team re deposition transcripts and exhibits.	0.3	
12/28/2021	AX	Supplemental initial disclosures.	0.1	
12/28/2021	KES	Gather documents for Lindstrom depo prep.	0.5	
12/29/2021	GCG	Meet with GW, MJ, and RBGG ream re deposition preparation and class certification reply.	1.0	
12/29/2021	GCG	Follow-up meeting and emails with RBGG team re deposition preparation and class certification reply.	0.6	
12/29/2021	BBK	Reviewing M. Johnson case task list distributed in advance of 12/29 team meeting.	0.2	
12/29/2021	BBK	Meeting w/ co-counsel re case priorities and tasks.	1.2	
12/29/2021	BBK	RBGG team meeting re case priorities and tasks.	0.3	
12/29/2021	JSY	Conf. w/ AX re deposition prep memo for clients.	0.3	
12/29/2021	JSY	Client prep memo.	0.3	
12/29/2021	JSY	Attend team meeting.	1.5	
12/29/2021	JSY	Review client depo transcripts and draft memo re same; e-mails re same.	2.8	
12/29/2021	AX	Team meeting re case tasks.	1.5	
12/29/2021	AX	Update team to-to list.	0.3	
12/29/2021	AX	Review documents in preparation for meeting with LV re deposition prep, including updating deposition outline memo.	0.5	
12/29/2021	AX	Email and phone correspondence with Brookdale Alhambra class member re declaration.	0.4	
12/29/2021	AX	Email correspondence w/ Veritext re deposition transcripts.	0.2	
12/29/2021	AX	Call with JSY re client deposition prep memo and other case tasks.	0.3	
12/30/2021	GCG	Review and analyze Sunrise class certification decision.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/30/2021	GCG	Confer w/AX and email GW, team re alter ego issues.	0.3	
12/30/2021	GCG	Legal research re same.	0.2	
12/30/2021	GCG	Confer w/BBK and email team re preparation for Plaintiffs' depositions.	0.2	
12/30/2021	GCG	Confer w/KES and email team re putative class member outreach and declarations.	0.2	
12/30/2021	BBK	Meeting w/ GCG re P. Lindstrom deposition.	0.2	
12/30/2021	BBK	Emailing investigator re resuming outreach to potential witnesses.	0.2	
12/30/2021	BBK	Emailing G. Wallace re final depo prep sessions for P. Lindstrom and R. Carlson.	0.1	
12/30/2021	BBK	Reviewing G. Maatman update re: Ds' withdrawing objections to producing class list and conferring w/ co-counsel re same.	0.1	
12/30/2021	BBK	Conferring w/ P Lindstrom re 1/5 depo prep session.	0.2	
12/30/2021	BBK	Reviewing Santa Cruz Sentinel article on BD Scotts Valley and reporting to RBGG team re same.	0.3	
12/30/2021	BBK	Conferring w/ KES/JSY/GCG re outreach to current resident at BD Scotts Valley quoted in Santa Cruz Sentinel article for potential declaration.	0.1	
12/30/2021	JSY	Emails re class cert. reply declarations.	0.3	
12/30/2021	JSY	Emails re article re price increases at SV.	0.1	
12/30/2021	JSY	Review client depo transcripts; draft questions and topics re same for prep memo; emails re same.	4.6	
12/30/2021	JSY	Review M+C notes re RFP 11 in Set 6.	0.2	
12/30/2021	JSY	Emails re depo prep video.	0.1	
12/30/2021	AX	Email correspondence w/ team re deposition transcript invoices.	0.1	
12/30/2021	AX	Email correspondence w/ KES re deposition prep location.	0.1	
12/30/2021	AX	Review documents for LV deposition prep.	1.3	
12/30/2021	AX	Call with KES re LV documents.	0.2	
12/30/2021	AX	Review LV emails and documents for supplemental production to Brookdale.	1.8	
12/30/2021	AX	Related email correspondence w/ RB and KES.	0.2	
12/30/2021	AX	Call with GCG re corporate unity of interest issues.	0.2	
12/30/2021	AX	Legal research re alter ego and unity of interest issues.	1.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/30/2021	KES	Legal research.	0.3	
12/30/2021	KES	Research and book depo space for LV deposition.	2.6	
12/30/2021	KES	Confer AX re docs for depo prep.	0.2	
12/30/2021	KES	Follow up re depo invoice.	0.2	
12/30/2021	KES	Review class contact info and email team re potential new contact.	0.4	
12/30/2021	KES	TC relative of Scotts Valley resident re complaints and follow up email re same.	0.6	
12/30/2021	KES	Westlaw research re employee lawsuits v Broodale.	1.2	
12/31/2021	JSY	Emails re client depo prep memo.	0.1	
12/31/2021	JSY	Research and draft letter brief re disciplinary documents; emails with team re same.	1.8	
12/31/2021	AX	Review and revise plaintiff deposition prep memo and related correspondence with team.	0.5	
12/31/2021	AX	Legal research regarding CLRA, elder financial abuse statute and liability issues.	1.3	
12/31/2021	KES	Continue Westlaw research re former employee suits.	1.0	
1/3/2022	GCG	Email w/ expert re materials needed for alter ego analysis.	0.1	
1/3/2022	GCG	Conf w/ AX re same.	0.1	
1/3/2022	GCG	Review BBK analysis in preparation for meet and confer.	0.1	
1/3/2022	GCG	Conf w/ AX and emails to JSY, AX and BBK re preparation for plaintiffs' deposition.	0.2	
1/3/2022	GCG	Email from GM re follow up issues from depositions so far.	0.1	
1/3/2022	GCG	(Billing Judgment) Email w/ JM re invoices.	0.0	0.1
1/3/2022	BBK	Conferring w/ G. Wallace re depo prep sessions w/ P. Lindstrom and R. Carlson.	0.1	
1/3/2022	BBK	Following up w/ KES re prep for R. Carlson depo; outreach to BD Scotts Valley resident and potential declarant.	0.1	
1/3/2022	BBK	Conferring w/ RBGG team re Ds' production of supp resident files for named Ps in advance of Jan depos.	0.1	
1/3/2022	BBK	Conferring w/ JSY/AX/GCG re plan for defending Jan Plaintiff depos.	0.1	
1/3/2022	BBK	Analyzing/preparing for Ps' position in M&C over RFPs seeking DSS citation related docs; drafting proposal re same to co-counsel.	2.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/3/2022	BBK	Reviewing JSY/AX revised memo guidance for depo prep for named Ps.	0.4	
1/3/2022	JSY	Emails re depo prep meeting.	0.1	
1/4/2022	GCG	Emails w/ and regarding alter ego expert SS.	0.2	
1/4/2022	GCG	Conf w/ AX and emails to GW and MJ re same.	0.3	
1/4/2022	GCG	Conf w/ and emails to JSY, BBK and AX re preparation for plaintiffs' depositions.	0.9	
1/4/2022	GCG	Emails to KES and team re research re cases relevant to reply.	0.5	
1/4/2022	GCG	Review KES research.	0.3	
1/4/2022	GCG	Meet w/ LV and AX re deposition preparation.	0.3	
1/4/2022	GCG	Review alter ego materials and memo.	0.2	
1/4/2022	BBK	Preparing for meet and confer w/ Ds re RFP Set 7.	0.4	
1/4/2022	BBK	Conferring w/ M. Johnson re plan for meet and confer w/ Ds re RFP Set 7.	0.5	
1/4/2022	BBK	Meeting and conferring w/ Ds re RFP Set 7.	1.2	
1/4/2022	BBK	Debriefing w/ M. Johnson re meet and confer w/ Ds re RFP Set 7.	0.3	
1/4/2022	BBK	Emailing RBGG team re: meet and confer w/ Ds re RFP Set 7.	0.1	
1/4/2022	BBK	Conferring w/ RBG team re FU w/ potential declarants.	0.1	
1/4/2022	BBK	Conferring w/ R. Bonner and KES re supp doc production by Ds of Pls' resident files.	0.1	
1/4/2022	BBK	Meeting w/ GCG/JSY/AX re defending Pls' depositions.	0.6	
1/4/2022	BBK	Emailing w/ P. Lindstrom re 1/5 depo prep session.	0.1	
1/4/2022	BBK	Conferring w/ investigator re outreach.	0.2	
1/4/2022	BBK	Reviewing transcripts of named P depositions in prep for P. Lindstrom depo.	1.2	
1/4/2022	JSY	Emails re depo prep.	0.1	
1/4/2022	JSY	Meeting with team re depo prep.	0.5	
1/4/2022	JSY	Emails re potential declarants.	0.1	
1/4/2022	JSY	Emails re letter brief re CAPs.	0.1	
1/4/2022	JSY	Emails re ML depo prep.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/4/2022	JSY	Emails re research.	0.1	
1/4/2022	AX	Deposition prep session with Loresia Vallette.	1.8	
1/4/2022	AX	Review Bernie Jestrabek-Hart produced documents in response to Brookdale questions.	0.8	
1/4/2022	AX	Meeting with JSY, GCG, BBK re depositions, other case tasks.	0.7	
1/4/2022	AX	Calls with Loresia Vallette.	0.3	
1/4/2022	AX	Email correspondence w/ team re intake issues.	0.1	
1/4/2022	AX	Email correspondence re alter ego and related documents.	0.1	
1/4/2022	AX	Email correspondence re deposition transcripts.	0.1	
1/4/2022	KES	Create chart re witnesses.	6.0	
1/4/2022	KES	Emails with team re follow up with potential declarants and review RAs re same.	0.5	
1/4/2022	KES	Review newly produced BKD docs and code in Relativity; update electronic files re same.	1.2	
1/5/2022	GCG	Review and analyze Brookdale representatives re corp control in removal cases.	0.3	
1/5/2022	GCG	Emails to GW, MJ and AX re same and re documents to provide to consultant SS.	0.3	
1/5/2022	GCG	Conf w/ JSY re preparation for ML deposition.	0.2	
1/5/2022	GCG	Review notes from ML meetings and email to EH re memo to file and timeline for deposition preparation.	0.3	
1/5/2022	GCG	Initial review of plaintiffs' deposition transcript.	0.1	
1/5/2022	BBK	Analyzing declaration/discovery/documents to plan depo prep session w/ P Lindstrom.	1.7	
1/5/2022	BBK	Conferring w/ KES re preparing docs for R. Carlson depo prep.	0.1	
1/5/2022	BBK	Conferring w/ KES re R. Carlson deposition and final depo prep session in Santa Rosa.	0.1	
1/5/2022	BBK	Emailing w/ Carlsons re 1/11 depo prep session.	0.1	
1/5/2022	BBK	First depo prep session w/ P LIndstrom.	2.7	
1/5/2022	BBK	Emailing w/ P Lindstrom re upcoming depo prep sessions.	0.2	
1/5/2022	JSY	Depo prep meeting with ML.	2.6	
1/5/2022	JSY	Conf. w/ GCG re depos.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/5/2022	JSY	Emails re additional documents to produce from ML.	0.2	
1/5/2022	JSY	Review ML documents for depo prep.	1.1	
1/5/2022	AX	Call with KES re document production issues.	0.2	
1/5/2022	AX	Call with Alhambra class member about intake.	0.1	
1/5/2022	AX	Email correspondence w/ RS and team re intake.	0.1	
1/5/2022	AX	Call with Ryan Bonner and KES re document production issues.	0.3	
1/5/2022	AX	Review Loresia Vallette documents for production and related correspondence with KES.	0.7	
1/5/2022	AX	Review documents and send to consultants including related correspondence with KES.	0.4	
1/5/2022	KES	Upload documents to Sharefile and send to expert; brief review of docs re same; confer AX re same.	0.5	
1/5/2022	KES	Download and circulate pleading.	0.1	
1/5/2022	KES	Emails with team re witness research.	0.8	
1/5/2022	KES	Review document production and confirm prior production of client doc; confer AX re same.	0.9	
1/5/2022	KES	(Billing Judgment) Locate and reserve depo and depo prep space for Carlson.	0.0	2.0
1/5/2022	KES	Review Vallette client documents to confirm supplemental production and prepare document production; confer AX re same.	3.3	
1/6/2022	GCG	Emails to MJ, AX and JSY re preparation for plaintiffs' depositions and work w/ alter ego expert.	0.2	
1/6/2022	BBK	Conferring w/ J. and R. Carlson re depo prep session.	0.1	
1/6/2022	BBK	Reviewing JSY - M. Johnson comm'ns re joint discovery letter brief.	0.1	
1/6/2022	BBK	Conferring w/ KES re R. Carlson depo prep sessions.	0.2	
1/6/2022	BBK	Conferring w/ JSY and AX re plan for R. Carlson depo prep.	0.1	
1/6/2022	BBK	Creating and organizing spreadsheet of former BD Health & Wellness Directors.	2.3	
1/6/2022	BBK	Conferring w/ investigator re witness outreach.	0.1	
1/6/2022	BBK	Reviewing KES report re research into potential witnesses.	0.1	
1/6/2022	JSY	Emails re letter brief.	0.1	
1/6/2022	JSY	Emails re additional docs from ML.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/6/2022	JSY	Emails re potential witnesses.	0.1	
1/6/2022	AX	Review documents for Loresia Vallette deposition prep session and related correspondence w/ team.	0.8	
1/6/2022	AX	Email correspondence w/ team re corporate control issues.	0.4	
1/6/2022	KES	(Billing Judgment) Emails with AX confirming Vallette depo space details; emails to team re other space needs.	0.0	0.5
1/6/2022	KES	Prepare supplemental Lytle documents for production.	1.2	
1/6/2022	KES	Follow up re supplemental Vallette docs.	0.4	
1/6/2022	KES	Update Carlson depo prep folders.	0.3	
1/6/2022	KES	Confer AW re expert sign PO ack and review files re same.	0.3	
1/6/2022	KES	Continue research and review of witnesses email team re same.	1.3	
1/6/2022	KES	Follow up email with potential declarant; review documents in Relativity re other potential declarant.	0.4	
1/7/2022	GCG	Emails to JSY and KES re potential witness research and follow up.	0.2	
1/7/2022	GCG	Conf w/ JSY re same and re preparation for upcoming deposition.	0.2	
1/7/2022	GCG	Emails to BBK and team re plaintiffs' documents and supplemental production.	0.2	
1/7/2022	GCG	Review GM letter re same.	0.1	
1/7/2022	GCG	Emails to MJ, AX, QT and SS re interrogatories.	0.1	
1/7/2022	BBK	Creating and organizing spreadsheet of potential witnesses for outreach.	2.0	
1/7/2022	BBK	(Billing Judgment) conferring w/ KES re P. Lindstrom deposition location.	0.0	0.1
1/7/2022	BBK	Emailing w/ investigator re outreach to potential witnesses.	0.2	
1/7/2022	BBK	Reviewing JSY-KES comm'ns re outreach and update to co-counsel re same.	0.2	
1/7/2022	BBK	Drafting report to co-counsel re investigator outreach.	0.1	
1/7/2022	BBK	Comm'ns w/ co-counsel re serving ROGs re local transportation policies in lieu of immediate motion to compel.	0.1	
1/7/2022	BBK	Preparing for second P. Lindstrom depo prep session.	0.2	
1/7/2022	BBK	Second P. Lindstrom depo prep session.	2.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/7/2022	BBK	Reviewing opposing counsel letter re Ps' supp doc productions in advance of depositions and conferring w/ JSY and AX re same.	0.1	
1/7/2022	BBK	Conferring w/ AX re testimony in B. Jestrabek-Hart depo re emergency evacuation plans.	0.2	
1/7/2022	BBK	Drafting/sending report to RBGG team re need for supp doc production in advance of P. Lindstrom and testimony re same.	0.2	
1/7/2022	BBK	Emailing w/ GCG and co-counsel re need for supp doc production in advance of P. Lindstrom and testimony re same.	0.1	
1/7/2022	JSY	Emails and conf. re issues with document productions before depo prep.	0.2	
1/7/2022	JSY	Emails re class list.	0.1	
1/7/2022	JSY	Potential witness outreach by phone and email; email with team re same.	2.4	
1/7/2022	AX	Email correspondence w/ team re Brookdale Scotts Valley EDs and related phone call with Bernie Jestrabek-Hart.	0.3	
1/7/2022	AX	Prepare for deposition prep session with Loresia Vallette.	0.3	
1/7/2022	KES	Update calendar with all client depo prep and remote depo dates and locations; calendar errata deadline.	0.7	
1/7/2022	KES	Follow up re production of supplemental Lytle docs.	0.3	
1/7/2022	KES	Follow up tc with potential declarant; review docs re same and email re same.	0.7	
1/7/2022	KES	Review and gather additional information re potential witnesses for possible outreach.	2.5	
1/9/2022	AX	Review documents and prepare for meeting with Loresia Vallette.	0.8	
1/9/2022	AX	Email correspondence w/ team re case issues.	0.5	
1/9/2022	AX	(Reduced Charge) Travel to Long Beach for deposition prep.	0.8	0.9
1/10/2022	GCG	Emails to AX and MJ re meeting w/ expert.	0.2	
1/10/2022	GCG	Emails to AX and team re preparing plaintiffs for deposition and their documents.	0.1	
1/10/2022	BBK	Reviewing e-mails w/ co-counsel and opposing counsel re Pls' depositions and Ds' supp doc prods.	0.1	
1/10/2022	BBK	Conferring w/ P. Lindstrom re letter to BD Scotts Valley ED.	0.1	
1/10/2022	BBK	Conferring w/ KES re confirming P. Lindstrom re letter to BD Scotts Valley ED was produced.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/10/2022	BBK	Reviewing JSY + M. Johnson draft discovery letter brief on RFPs 10 and 11, Set 6.	0.1	
1/10/2022	BBK	Reviewing/responding to query from investigator re outreach to potential witnesses.	0.1	
1/10/2022	BBK	Emailing re co-counsel re potential supp doc production in advance of P. Lindstrom depo.	0.2	
1/10/2022	BBK	Conferring w/ co-counsel-JSY-KES re BD handbooks.	0.1	
1/10/2022	BBK	Preparing for P. Lindstrom deposition.	0.9	
1/10/2022	BBK	Conferring w/ ML re preparing binder of key docs for P Lindstrom depo prep.	0.2	
1/10/2022	BBK	Preparing for first R. Carlson depo prep meeting on 1/11.	0.5	
1/10/2022	JSY	Emails and texts re extension for errata for JA.	0.2	
1/10/2022	JSY	Emails re former employee contacts.	0.1	
1/10/2022	JSY	Review and edit RFP 10 and 11 letter brief; emails re same.	0.3	
1/10/2022	JSY	Emails re resident handbooks.	0.2	
1/10/2022	JSY	Prep for ML depo; review documents re same; emails re same.	2.0	
1/10/2022	AX	Meeting with Loresia Vallette re deposition preparation.	7.0	
1/10/2022	AX	Email correspondence w/ team re corporate control consultants and documents.	0.2	
1/10/2022	EH	Memo to file re named plaintiff contacts in preparation for deposition.	1.3	
1/10/2022	KES	(Billing Judgment) Zoom connection check with AX for Vallette depo prep.	0.0	0.3
1/10/2022	KES	Review and gather documents in connection with Vallette and Lindstrom depo prep.	0.7	
1/10/2022	KES	Download and circulate Jestrabek-Hart depo transcript and upload to TextMap.	0.3	
1/10/2022	KES	Upload expert depos to TextMap and DMS.	0.6	
1/10/2022	KES	Email Veritext re errata extension and calendar same.	0.2	
1/10/2022	KES	Update electronic expert files.	0.3	
1/11/2022	GCG	Conf w/ JSY and emails to team re preparation for plaintiffs' depositions.	0.3	
1/11/2022	BBK	Preparing for 1st depo prep session w/ R. Carlson.	0.4	
1/11/2022	BBK	Conducting 1st depo prep session w/ R. Carlson.	2.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/11/2022	BBK	Emailing w/ R. Carlson re plan for upcoming depo prep sessions and deposition.	0.2	
1/11/2022	BBK	Reviewing co-counsel reports re management agreements produced by BD; comm'ns w/ co-counsel re next team meeting on case priorities/tasks.	0.1	
1/11/2022	BBK	Reviewing KES update re call w/ blind resident at BD Scotts Valley.	0.1	
1/11/2022	JSY	Multiple texts and calls with AX and GCG re LV depo.	0.3	
1/11/2022	JSY	Edit letter brief re RFP Set 6, 10 and 11; emails with MTJ and opposing counsel re same.	0.4	
1/11/2022	JSY	Prep for ML depo; review documents re same.	3.5	
1/11/2022	AX	(Reduced Charge) Travel to deposition space preparing client before deposition.	0.3	0.2
1/11/2022	AX	Defend Loresia Vallette deposition.	9.5	
1/11/2022	AX	(Reduced Charge) Travel from Long Beach to San Francisco.	1.7	1.8
1/11/2022	AX	Preparing client before deposition.	1.0	
1/11/2022	KES	Review documents and prepare for call with potential declarant; tc potential declarant; email team re same; update Sharepoint re same.	1.5	
1/11/2022	KES	Review status of all depo transcripts and errata deadlines; calendar deadline; follow up re transcript; update depo status chart.	1.6	
1/11/2022	KES	Update expert electronic files and index of documents provided to BRG.	0.9	
1/12/2022	GCG	Conf w/ BBK and emails to JSY and AX re preparation for client deposition.	0.3	
1/12/2022	GCG	Email to ML re same.	0.1	
1/12/2022	GCG	Emails to KES and team re document production.	0.1	
1/12/2022	GCG	Conf w/ and emails to AX re meeting w/ corporate control consultants and preparation for same.	0.2	
1/12/2022	GCG	Email to CM and WM re status.	0.1	
1/12/2022	BBK	Reviewing JSY report re L. Vallette deposition; reviewing JSY comm'ns re supp prod in advance of M. Lytle deposition.	0.1	
1/12/2022	BBK	Conferring w/ R. Steyer re supp initial disclosures.	0.1	
1/12/2022	BBK	Reviewing M. Johnson draft letter to opposing counsel re in-person depositions and timing of Ps' supp doc productions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/12/2022	BBK	Conferring w/ GCG, AX and JSY re prep for P Lindstrom deposition.	0.4	
1/12/2022	BBK	Planning/preparing for P Lindstrom deposition and final prep session.	3.7	
1/12/2022	BBK	Emailing w/ P Lindstrom re depo prep session.	0.1	
1/12/2022	BBK	Reviewing AX report re Vallette deposition.	0.1	
1/12/2022	JSY	Multiple conf. w/ BBK and AX re depo prep; emails re same.	0.8	
1/12/2022	JSY	Depo prep with ML (1.1 incl. GBW).	4.5	
1/12/2022	JSY	Multiple emails re additional document productions.	0.3	
1/12/2022	JSY	Review MTJ letter re document productions and remote depos.	0.1	
1/12/2022	JSY	Email with potential witness rep.	0.1	
1/12/2022	AX	Draft email summary of Vallette deposition to team.	0.7	
1/12/2022	AX	(Billing Judgment) Email correspondence w/ BBK re deposition space.	0.0	0.1
1/12/2022	AX	Email correspondence w/ GCG re Brookdale alter ego issues.	0.2	
1/12/2022	AX	Call with GCG re same.	0.1	
1/12/2022	AX	Email correspondence w/ MJ, GCG, GW re documents.	0.8	
1/12/2022	KES	Prepare additional Lytle client docs for production and confer JY re same.	1.4	
1/13/2022	GCG	Prepare for and conduct meeting w/ SS, OT, MJ and AX re corporate control issues.	0.7	
1/13/2022	GCG	Emails to JSY and team re ML deposition.	0.2	
1/13/2022	BBK	(Reduced Charge) Traveling from SF to Scotts Valley for P Lindstrom depo.	1.0	1.0
1/13/2022	BBK	In-person depo prep w/ P Lindstrom.	5.5	
1/13/2022	BBK	(Reduced Charge) Travel from depo prep session w/ P Lindstrom to hotel.	0.1	0.1
1/13/2022	BBK	Debriefing w/ JSY re M. Lytle deposition.	0.4	
1/13/2022	BBK	Emailing opposing counsel to confirm remote deposition access info for P. Lindstrom depo.	0.1	
1/13/2022	JSY	ML deposition; conf. w/ client prior to depo and during breaks.	8.8	
1/13/2022	JSY	Debrief ML depo by phone with BBK and draft email to team re same.	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/13/2022	AX	Call with MJ re corporate control issues.	0.1	
1/13/2022	AX	Zoom meeting with consultants GCG, MJ re corporate control issues.	0.7	
1/13/2022	AX	Legal research and draft memo re alter ego issues.	4.0	
1/14/2022	GCG	Communications w/ JSY and BBK re PL deposition and upcoming deposition preparation.	0.3	
1/14/2022	BBK	(Reduced Charge) Travel from hotel to deposition location for P Lindstrom depo.	0.1	0.1
1/14/2022	BBK	Meeting w/ P Lindstrom in advance of deposition.	0.8	
1/14/2022	BBK	Defending deposition of P Lindstrom (including comm'ns w/ P Lindstrom during breaks).	9.8	
1/14/2022	BBK	Debriefing w/ P Lindstrom post-deposition.	0.2	
1/14/2022	BBK	Comm'ns w/ GCG and JSY post-PLindstrom depo.	0.1	
1/14/2022	BBK	(Reduced Charge) Traveling home from Felton after P Lindstrom depo.	0.8	0.8
1/14/2022	JSY	Emails and texts re client depos and transcripts.	0.5	
1/14/2022	JSY	Emails re joint letter brief.	0.1	
1/14/2022	JSY	Emails re call with potential witness.	0.1	
1/14/2022	AX	Email correspondence w/ team re Michele Lytle and Loresia Vallette deposition transcripts.	0.3	
1/14/2022	AX	Research and draft memo re corporate control issues.	1.0	
1/15/2022	GCG	Review BBK summary of PL deposition and emails to BBK and MJ re same.	0.1	
1/15/2022	BBK	Drafting summary of P Lindstrom deposition to co-counsel and RBGG team.	0.6	
1/16/2022	BBK	Reviewing/responding to P Lindstrom email re deposition.	0.1	
1/16/2022	BBK	Reviewing/responding to query from investigator re outreach.	0.1	
1/17/2022	GCG	Review and comment on KES interview w/ potential declarant.	0.1	
1/17/2022	GCG	Email to MJ and JSY re motion to compel brief.	0.1	
1/17/2022	BBK	Conferring w/ JSY and AX re video of Pls' depositions.	0.1	
1/17/2022	AX	Email correspondence w/ team re deposition issues.	0.1	
1/17/2022	AX	Research and draft memo on alter ego issues.	1.0	
1/18/2022	GCG	Email to AX re depo correction and discovery.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/18/2022	BBK	Analyzing documents in prep for R. Carlson depo.	0.6	
1/18/2022	BBK	Emailing w/ ML re assisting w/ prep for R Carlson depo.	0.1	
1/18/2022	BBK	Reviewing JSY report re call w/ potential witness; conferring w/ JSY re transcript from M. Lytle depo.	0.1	
1/18/2022	JSY	T/C with potential witness re declaration.	0.2	
1/18/2022	JSY	Draft email to team re call with potential witness.	0.4	
1/18/2022	JSY	Emails re ML depo transcript.	0.1	
1/18/2022	AX	Legal research and draft memo on corporate control, ownership, and related issues (2.2); email correspondence w/ GCG re same (.2).	2.4	
1/19/2022	BBK	Conferring w/ ML and JSY re prep for R Carlson depo.	0.1	
1/19/2022	BBK	Preparing for 2d prep session for R Carlson depo.	0.3	
1/19/2022	BBK	2d prep session for R Carlson depo.	3.4	
1/19/2022	BBK	Conferring w/ team re 1/21 co-counsel meeting; reviewing MJ FU w/ Ds re failure to produce resident files two months after Court Order.	0.1	
1/19/2022	BBK	Emailing w/ T. Close/JSY/KES re video of evacuation of BD Fountaingrove residents during October 2017 fire.	0.1	
1/19/2022	JSY	Review video re Fountaingrove evacuation; emails re same.	0.3	
1/19/2022	JSY	Review ML depo transcript; emails re same.	0.4	
1/19/2022	AX	Draft interrogatories and RFPs and review notes of meeting with experts.	1.5	
1/19/2022	KES	Download and circulate Lytle transcript and update TextMap.	0.3	
1/19/2022	KES	Review emails re evacuation video and attempt download.	0.3	
1/20/2022	GCG	Emails to MJ, JY, AX and BU re plaintiffs' depositions and discovery related to reply brief.	0.3	
1/20/2022	GCG	Review and analyze AX research memo re Brookdale's alter ego defenses.	0.3	
1/20/2022	GCG	Conf w/ BBK re preparation for RC deposition and related case tasks.	0.2	
1/20/2022	JSY	Call with potential witness; emails with team re same.	0.2	
1/20/2022	JSY	Emails re ML transcript exhibits.	0.1	
1/20/2022	JSY	Research re potential witnesses.	0.7	
1/20/2022	JSY	Emails re letter brief re RFP 10 and 11.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/20/2022	JSY	Emails re leads from PI re potential witnesses; review memo re same.	0.2	
1/20/2022	JSY	Review and edit draft ROGs and RFPs re corporate control issue.	0.7	
1/20/2022	JSY	Prepare memo re issues to discuss with potential witnesses.	0.2	
1/20/2022	JSY	Emails re memo re corporate control issues.	0.1	
1/20/2022	AX	Draft interrogatories and RFP re corporate control issues.	1.8	
1/20/2022	AX	Review email correspondence w/ team re investigator leads, case tasks.	0.3	
1/20/2022	AX	Revise interrogatories and RFPs.	0.6	
1/20/2022	AX	Review comments on corporate control legal research memo.	0.2	
1/20/2022	KES	Download YT video of Fountaingrove 2017 fire evacuation.	0.5	
1/21/2022	BBK	Reviewing JSY and MJ emails w/ Ds re discovery disputes and joint letter brief; JSY FU emails w/ witnesses.	0.1	
1/21/2022	BBK	Preparing for R. Carlson deposition.	0.5	
1/21/2022	BBK	Reviewing/reporting on memo from investigator re witness outreach.	0.2	
1/21/2022	BBK	Conferring w/ co-counsel re Daubert brief re staffing experts.	0.1	
1/21/2022	BBK	Reviewing/revising draft supplemental initial disclosures (including fact research re additional witnesses).	2.0	
1/21/2022	BBK	Conferring w/ JSY re witnesses to include for supplemental initial disclosures.	0.2	
1/21/2022	BBK	Co-counsel meeting re case priorities and tasks.	1.0	
1/21/2022	BBK	Preparing for R. Carlson deposition.	0.3	
1/21/2022	BBK	Reviewing AX minutes from co-counsel meeting.	0.1	
1/21/2022	JSY	Team meeting.	1.0	
1/21/2022	JSY	Emails re letter brief re RFP 10 and 11 in Set 6.	0.2	
1/21/2022	JSY	Emails re initial disclosure supplementation.	0.2	
1/21/2022	JSY	Conf. w/ BBK re motions to compel.	0.1	
1/21/2022	JSY	Emails re deposition summaries.	0.1	
1/21/2022	JSY	Review notes re meeting and motions to compel.	0.1	
1/21/2022	AX	Team meeting re case tasks (1.0); draft meeting notes and update to-do list (.5).	1.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 537

SERVICES

Date	Person	Description of Services	Hours	Discount
1/21/2022	EH	Call with co-counsel re case tasks, discovery, motions to compel, etc. (.8); correspondence with team re same (.2).	1.0	
1/21/2022	KES	Zoom meeting with co-counsel re depositions, discovery, class cert reply review.	1.0	
1/21/2022	KES	Send follow up emails re same; review to-do list re same.	0.5	
1/21/2022	KES	Update chart of potential witnesses.	0.3	
1/23/2022	GCG	Review AX report on team meeting and status of motions to compel support to plaintiffs' reply.	0.2	
1/23/2022	GCG	Email w/ MH re status of motion and role of declarants.	0.1	
1/23/2022	BBK	Emailing w/ investigator re outreach to witnesses.	0.1	
1/24/2022	GCG	Conf w/ JSY and emails to MJ and team re motions to compel.	0.1	
1/24/2022	JSY	Review and edit letter brief re RFP 10 and 11.	0.4	
1/24/2022	JSY	Emails re operations plans letter brief.	0.1	
1/24/2022	JSY	T/C to potential witness; emails re same.	0.1	
1/24/2022	BBK	(Reduced Charge) Traveling from SF to Santa Rosa for R. Carlson deposition.	0.8	0.9
1/24/2022	BBK	Conducting in-person deposition prep meeting w/ R. Carlson.	6.5	
1/24/2022	BBK	(Reduced Charge) Traveling from R. Carlson depo prep session to hotel.	0.2	0.2
1/24/2022	BBK	Reviewing JSY update re call w/ potential witness reviewing JSY-M. Johnson comm'ns re finalizing joint letter brief on RFP Set 6, 10 & 11.	0.1	
1/24/2022	AX	Review Bernie Jestrabek-Hart transcript for errata.	0.5	
1/24/2022	AX	Review team correspondence re Brookdale witnesses.	0.1	
1/25/2022	GCG	Communications w/ team re RC deposition and motions to compel.	0.2	
1/25/2022	JSY	T/C with MTJ re Motions to Compel.	0.5	
1/25/2022	JSY	T/C with AX re motions to compel re corporate documents and new draft discovery.	0.4	
1/25/2022	JSY	Review discovery re corporate issues; emails with AX re same.	0.2	
1/25/2022	JSY	Emails re witness to interview.	0.1	
1/25/2022	BBK	(Reduced Charge) Travel from hotel to deposition location for R. Carlson depo.	0.1	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/25/2022	BBK	Meeting w/ R. Carlson in advance of deposition.	0.9	
1/25/2022	BBK	Defending R. Carlson deposition (including client comm'ns during breaks).	10.4	
1/25/2022	BBK	Debriefing w/ R. Carlson post-deposition.	0.2	
1/25/2022	BBK	(Reduced Charge) Traveling home from Santa Rosa after R. Carlson deposition.	0.6	0.7
1/25/2022	AX	Call w/ JSY re case tasks (.4); email correspondence w/ MJ and team re corporate control issues (.2); revise RFP and rogs (.3).	0.9	
1/26/2022	GCG	Review court order re page limits for Daubert motions.	0.1	
1/26/2022	JSY	Emails re order re Daubert motions.	0.1	
1/26/2022	JSY	Emails re MTC re RFP Set 7.	0.2	
1/26/2022	BBK	Reviewing/responding to requests from court reporter for P. Lindstrom deposition.	0.2	
1/26/2022	BBK	Reviewing JSY - AX - M. Johnson comm'ns re corporate control discovery and potential MTC re same.	0.1	
1/26/2022	BBK	Reviewing BD motion for leave to file 50-page Daubert motion and court order denying same.	0.1	
1/26/2022	BBK	Drafting/sending summary of R. Carlson deposition to co-counsel and RBGG team.	1.0	
1/26/2022	BBK	Conferring w/ court reporter for R. Carlson deposition re transcript order.	0.1	
1/26/2022	AX	Revise RFPs and interrogatories and send to experts for review.	0.8	
1/26/2022	KES	Download and circulate pleadings.	0.2	
1/26/2022	KES	Organize electronic discovery folders.	2.2	
1/27/2022	GCG	Conf w/ BBK re RC deposition.	0.1	
1/27/2022	GCG	Email to GW and team re expert SS.	0.1	
1/27/2022	JSY	Emails re letter brief.	0.2	
1/27/2022	JSY	Emails re RC deposition.	0.1	
1/27/2022	JSY	Review letter re class member calls; multiple emails re same.	0.3	
1/27/2022	BBK	Conferring w/ JSY re R. Carlson deposition.	0.1	
1/27/2022	BBK	Emailing w/ court reporter for R. Carlson depo re transcript order options.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 539

SERVICES

Date	Person	Description of Services	Hours	Discount
1/27/2022	BBK	Reviewing comm'ns w/ co-counsel and experts re ROGs and RFPs re corporate control of CA facilities.	0.1	
1/27/2022	BBK	Reviewing comm'ns re filing joint discovery letter brief re RFP Set 6, 10 & 11.	0.1	
1/27/2022	BBK	Conferring w/ KES re outreach to family members of former BD residents re potential declarations.	0.2	
1/27/2022	BBK	Conferring w/ GW re R. Carlson deposition and FU w/ daughter of BD Windsor resident who reached out.	0.2	
1/27/2022	BBK	Reviewing letter from opposing counsel re contact w/ putative class members; conferring w/ RBGG team re same.	0.3	
1/27/2022	BBK	Prep for call w/ daughter of former BD Windsor resident.	0.3	
1/27/2022	BBK	Left VM in response to email from daughter of former BD Windsor resident; emailing RBGG team re same.	0.1	
1/27/2022	BBK	Phone call w/ GCG re R. Carlson deposition.	0.1	
1/27/2022	AX	Email correspondence w/ team re corporate control issues and meeting with consultants.	0.2	
1/27/2022	AX	Review team correspondence re case tasks.	0.2	
1/28/2022	GCG	Conf w/ and email to MJ and team re letter to defendants re putative class member communications.	0.2	
1/28/2022	GCG	Revise letter re same.	0.2	
1/28/2022	GCG	Emails to JSY and team re discovery letter brief and hearing and deposition transcripts.	0.2	
1/28/2022	JSY	Review response letter re class member contacts; emails re same.	0.2	
1/28/2022	JSY	Emails re transcript.	0.1	
1/28/2022	JSY	Emails re contact with potential witness.	0.1	
1/28/2022	JSY	Review HF transcript.	0.3	
1/28/2022	JSY	Draft email re RFP Set 7.	0.2	
1/28/2022	BBK	Conferring w/ RBGG team re ordering transcript for R. Carlson deposition; emailing w/ court reporter re same.	0.1	
1/28/2022	BBK	Conferring w/ co-counsel and RBGG team re responding to Maatman letter re contact w/ putative class members; reviewing draft response letter by M. Johnson re same.	0.2	
1/28/2022	BBK	Conferring by phone w/ GCG re responding to Maatman letter re contact w/ putative class members.	0.1	
1/28/2022	BBK	Reviewing proposed revisions to outreach letters to putative class members and comm'ns re same w/ co-counsel.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/28/2022	BBK	Reviewing letter from opposing counsel seeking additional expert discovery post-depositions.	0.1	
1/28/2022	BBK	Reviewing comm'ns w/ co-counsel re additional motions to compel and bringing discovery disputes to an impasse.	0.1	
1/28/2022	AX	Review expert disclosures and summarize in memo.	0.8	
1/28/2022	AX	Research corporate control issues and draft memo.	1.5	
1/28/2022	AX	Review complaint and relevant corporate unity issues.	0.5	
1/30/2022	GCG	Review KES summary of putative class member interview and email team re same.	0.1	
1/31/2022	GCG	Email to JSY and team re status of projects.	0.1	
1/31/2022	GCG	Prepare for and participate in meeting w/ consultants.	0.8	
1/31/2022	GCG	Conf w/ AX and email to AX and MJ re same.	0.1	
1/31/2022	JSY	Emails re team meeting and outreach calls.	0.1	
1/31/2022	BBK	Conferring w/ RBGG team re meeting on 2/1 re outreach to putative CMs and other case priorities.	0.1	
1/31/2022	BBK	Conferring w/ court report for P. Lindstrom depo re request for spelling of name of ED about whom P. Lindstrom testified.	0.1	
1/31/2022	BBK	Conferring w/ KES re receipt of P. Lindstrom deposition transcript and exhibits.	0.1	
1/31/2022	AX	Emails with team re case tasks meeting.	0.2	
1/31/2022	AX	Call with GCG re case tasks.	0.1	
1/31/2022	AX	Draft email to MJ, GCG, GW re corporate control research.	0.4	
1/31/2022	AX	Phone call with MJ re prep for call with experts.	0.4	
1/31/2022	AX	Call re corporate control issues.	0.7	
1/31/2022	AX	Legal research and draft memo on corporate control issues.	2.5	
2/1/2022	GCG	Prepare for and conduct meeting w/ RBGG team to plan deposition transcript review and witness outreach.	0.8	
2/1/2022	GCG	Conf w/ and email to JSY re motion to compel and hearing before MJ Beeler.	0.1	
2/1/2022	GCG	Email to MJ and GM re alleged improper outreach.	0.1	
2/1/2022	JSY	T/C with GCG re MTC.	0.1	
2/1/2022	JSY	Internal RBGG team meeting.	0.8	
2/1/2022	JSY	Emails and messages with clients re transcript errata.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/1/2022	JSY	Emails re MTC hearing.	0.1	
2/1/2022	JSY	Emails re letter re deposition messages.	0.1	
2/1/2022	BBK	Conferring w/ KES re receipt of R. Carlson deposition transcript.	0.1	
2/1/2022	BBK	Scheduling call w/ daughter of former BD Windsor resident.	0.1	
2/1/2022	BBK	Meeting w/ RBGG team re case priorities.	0.7	
2/1/2022	BBK	Reviewing comm'ns w/ co-counsel re discovery on ownership/corporate control and re 2/4 meeting.	0.1	
2/1/2022	BBK	Reviewing opposing counsel email and conferring w/ team re response to same.	0.2	
2/1/2022	AX	RBGG team meeting re case tasks (.8).	0.8	
2/1/2022	AX	Review team correspondence re case issues.	0.3	
2/1/2022	AX	Team correspondence re deposition issues.	0.1	
2/1/2022	AX	Legal research on corporate control issues.	0.8	
2/1/2022	AX	Revise draft interrogatories, RFPs, and appendices.	0.7	
2/1/2022	EH	(Reduced Charge) confer with team re case updates, discovery, etc.	0.8	0.2
2/1/2022	KES	Download and circulate Carlson depo transcript, upload to TextMap; calendar errata deadline.	0.2	
2/1/2022	KES	(Reduced Charge) Team Zoom re status of projects.	0.8	0.1
2/2/2022	GCG	Review discovery letter brief.	0.4	
2/2/2022	GCG	Emails to JSY, MJ and team re preparation for hearing.	0.1	
2/2/2022	GCG	Emails to BBK and team re meet and confer w/ defendants re depositions.	0.1	
2/2/2022	JSY	T/C with MTJ re MTF with Defs and discovery hearing tomorrow.	0.1	
2/2/2022	JSY	Emails re sending transcripts to clients.	0.2	
2/2/2022	JSY	Emails re MTC with Defs.	0.1	
2/2/2022	JSY	Review MTC; emails re argument tomorrow.	0.4	
2/2/2022	BBK	Reviewing and attending to payment of invoices for transcripts of R. Carlson and P. Lindstrom depos.	0.1	
2/2/2022	BBK	Reviewing AX - M. Johnson comm'ns re revising/finalizing/serving RFPs and ROGs re BD ownership and corporate control of CA facilities.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 542

SERVICES

Date	Person	Description of Services	Hours	Discount
2/2/2022	BBK	Conferring w/ JSY re 2/2 M&C w/ Ds and 2/3 discovery hearing.	0.1	
2/2/2022	BBK	Analyzing class cert order in Heredia v. Sunrise in prep for reply ISO class cert.	0.5	
2/2/2022	AX	Revise corporate control discovery (.8); email correspondence w/ team re same (.5).	1.3	
2/2/2022	KES	Provide Carlson transcript to co-counsel.	0.1	
2/3/2022	GCG	Prepare for and participate in discovery hearing before MJ Beeler.	1.5	
2/3/2022	GCG	Conferences and emails w/ GW, MJ and JSY re MJ's response and order and other discovery needed for class cert. reply.	0.5	
2/3/2022	JSY	(Billing Judgment) Attend discovery hearing.	0.0	1.2
2/3/2022	JSY	Emails and calls re discovery hearing.	0.2	
2/3/2022	JSY	Review discovery order.	0.1	
2/3/2022	BBK	Reviewing Court Order on ECF 340 Discovery Brief and M. Johnson FU w/ Ds re timing of court-ordered document production.	0.1	
2/3/2022	BBK	Preparing for phone interview w/ daughter of former BD Windsor resident.	0.2	
2/3/2022	BBK	phone interview w/ daughter of former BD Windsor resident.	1.1	
2/3/2022	BBK	Drafting report to RBGG team re phone interview w/ daughter of former BD Windsor resident.	0.2	
2/3/2022	BBK	Emailing w/ daughter of former BD Windsor resident and w/ EH re residency agreement and other docs.	0.1	
2/3/2022	AX	Call with MJ re discovery.	0.5	
2/3/2022	AX	Finalize and discussion with KES re serving discovery.	0.5	
2/3/2022	AX	Legal research and draft memo on corporate control issues.	3.7	
2/3/2022	KES	Finalize and serve discovery requests; confer AX re same.	0.5	
2/3/2022	KES	Download and circulate discovery order.	0.1	
2/4/2022	GCG	Prepare for and participate in team meetings to discuss strategy for reply.	1.0	
2/4/2022	GCG	Initial review of multiple Daubert motions.	0.1	
2/4/2022	GCG	Emails to GW, KES and JSY re same.	0.1	
2/4/2022	JSY	Team meeting re case tasks (0.9); RBGG internal meeting re same.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/4/2022	JSY	Emails and messages re transcript errata and time to discuss with clients.	0.2	
2/4/2022	JSY	Emails and messages re motions to disqualify experts; review same.	0.3	
2/4/2022	BBK	Reviewing AX legal memo on BD ownership/control and alter ego.	0.2	
2/4/2022	BBK	Emailing w/ Pis re status of outreach to former BD employees.	0.1	
2/4/2022	BBK	Meeting w/ co-counsel re discovery disputes, reply ISO class cert, and potential Daubert and MSJs.	0.9	
2/4/2022	BBK	RBGG team meeting re key tasks for BD case.	0.1	
2/4/2022	BBK	Conferring w/ litigation team re filing of Daubert motions against 5 Pls' experts and plan for opposition.	0.2	
2/4/2022	EH	Weekly call with team re case updates, discovery, defendants' opposition.	1.0	
2/4/2022	KES	Download and circulate 6 Daubert motions re Pltf experts and related motions to seal.	0.4	
2/4/2022	KES	Organize pleadings.	3.0	
2/4/2022	KES	Calendar deadlines; follow up re sealed documents.	0.2	
2/4/2022	KES	Team Zoom with co-counsel re research and discovery tasks; prep for reply.	1.0	
2/6/2022	GCG	Email to JSY re Daubert motions and response thereto.	0.2	
2/6/2022	JSY	Emails re expert motions and sealing motion dates.	0.1	
2/7/2022	JSY	Multiple emails and messages re sealing motion issues.	0.3	
2/7/2022	BBK	Reviewing Daubert Motions against Waters, Mastin, Kennedy, Kailes, Flores and Schroyer.	0.7	
2/7/2022	BBK	Comm'ns w/ RBGG team re admin motions to seal relating to Ds' Daubert motions.	0.2	
2/7/2022	BBK	Drafting/sending emails to co-counsel re deadlines for opposing admin motions to seal relating to Ds' Daubert motions and for justifying sealing based on Ps' confidentiality designations.	0.3	
2/7/2022	BBK	Drafting emails to P Lindstrom and R Carlson re review/corrections for deposition transcripts.	0.3	
2/7/2022	AX	Review Bernie Jestrabek-Hart deposition transcript for errata.	1.5	
2/7/2022	KES	Calendar oppositions to Daubert motions and motions to seal; review local rules re same; email team re same.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/8/2022	JSY	T/C with JA re transcript.	0.8	
2/8/2022	JSY	Review and edits to JA transcript.	1.7	
2/8/2022	BBK	Reviewing emails w/ opposing counsel re extension request to oppose Daubert motion and M&C on Ds' objections to Jestrabek-Hart ROGs.	0.1	
2/8/2022	BBK	Conferring w/ R. Carlson and P. Lindstrom re reviewing/correcting depo transcripts.	0.1	
2/8/2022	BBK	Conferring w/ KES re providing hard copy of depo transcript to R. Carlson.	0.1	
2/8/2022	BBK	Conferring w/ JSY and AX re call w/ B. Jestrabek-Hart.	0.1	
2/8/2022	BBK	Conferring w/ JSY and AX re errata sheets for deposition transcripts of Allgarme and Jestrabek-Hart.	0.2	
2/8/2022	AX	Review Bernie Jestrabek-Hart transcript for errata.	2.5	
2/8/2022	AX	Call with Bernie Jestrabek-Hart re errata and case update.	0.6	
2/8/2022	EH	DSS citations analysis and revisions to chart re same.	1.0	
2/8/2022	KES	Prepare and send copy of depo transcript to Ralph Carlson.	0.5	
2/9/2022	GCG	Conf w/ JSY re discovery issues and errata.	0.1	
2/9/2022	GCG	Begin review of AX memo.	0.1	
2/9/2022	JSY	(Reduced Charge) T/C with GCG re case issues.	0.1	0.1
2/9/2022	JSY	Emails re issue tags.	0.1	
2/9/2022	JSY	Emails re errata for Algarme.	0.2	
2/9/2022	BBK	Emailing w/ R. Carlson re reviewing depo transcript.	0.1	
2/9/2022	BBK	Conferring w/ litigation team re errata sheets for Pls' depo transcripts; reviewing co-counsel comm'ns w/ opposing counsel re: M&C on Ds' inadequate ROG responses.	0.1	
2/9/2022	BBK	Conferring w/ JSY and AX re creating issue codes for digesting depo transcripts.	0.1	
2/9/2022	AX	Review Bernie Jestrabek-Hart deposition transcript for errata (2.0); call with Bernie Jestrabek-Hart re errata and case update (.1).	2.1	
2/10/2022	GCG	Review and analyze AX memo to file re later ego issues.	0.2	
2/10/2022	JSY	T/C with ML re transcript.	0.3	
2/10/2022	JSY	Finalize JA errata; email same.	0.6	
2/10/2022	JSY	Emails re sealing motions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/10/2022	JSY	Review ML transcript.	2.0	
2/10/2022	BBK	Reviewing G. Maatman - M. Johnson comm'ns re: request for EOT to oppose Daubert motions (and internal comm'ns re same).	0.1	
2/10/2022	BBK	Conferring w/ JSY and AX re errata sheet for Algarme transcript.	0.1	
2/10/2022	AX	Email correspondence w/ team re deposition errata.	0.1	
2/10/2022	EH	Analysis of newly added DSS complaints/citations and revising chart re same.	3.1	
2/10/2022	KES	Email team and review local rules re deadlines for opposition/response to motions to seal.	0.3	
2/11/2022	GCG	Review and revise plaintiffs' motion for additional time to oppose Daubert motions.	0.4	
2/11/2022	GCG	Communications w/ JSY and BBK re same.	0.2	
2/11/2022	JSY	Emails re motion for extension re Daubert motions.	0.2	
2/11/2022	JSY	Emails re issue tags for depos.	0.1	
2/11/2022	BBK	Reviewing comm'ns w/ co-counsel re motion for EOT to oppose Ds' Daubert motions.	0.1	
2/11/2022	BBK	Reviewing EH analysis of DSS citations since class cert motion filed and proposed plan for Reply BBK Decl.	0.3	
2/11/2022	BBK	Conferring w/ EH re analysis of DSS citations since class cert motion filed and proposed plan for Reply BBK Decl.	0.1	
2/11/2022	BBK	Reviewing/commenting on M. Johnson draft motion for EOT to oppose Daubert motions and supporting declaration and proposed order.	0.4	
2/11/2022	BBK	Reviewing update from PI re outreach to witnesses; conf. re same.	0.2	
2/11/2022	BBK	Reviewing/commenting on AX draft issue tags for digesting deposition transcripts.	0.2	
2/11/2022	BBK	Reviewing M. Johnson follow-up email re resident files.	0.1	
2/11/2022	AX	Draft list of issue tags for deposition transcripts and related correspondence with team.	0.8	
2/11/2022	EH	Email correspondence with BBK summarizing complaints analysis.	0.4	
2/11/2022	KES	Download, circulate and upload Valette transcript to Textmap.	0.3	
2/12/2022	GCG	Review and analyze AX memorandum to file re alter ego analysis.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 546

SERVICES

Date	Person	Description of Services	Hours	Discount
2/14/2022	GCG	Conf w/ JSY re deposition errata and request for Daubert extension.	0.1	
2/14/2022	GCG	Meet w/ AX to discuss revisions to alter ego memo and follow up plan for reply.	0.6	
2/14/2022	JSY	Emails re issue tags.	0.1	
2/14/2022	JSY	Conf. w/ GCG re Daubert motions; emails re same.	0.3	
2/14/2022	JSY	Emails re class member outreach.	0.2	
2/14/2022	JSY	Emails re class member outreach.	0.2	
2/14/2022	BBK	Reviewing comm'ns w/ R. Steyer re FU w/ putative class members for potential declarations.	0.1	
2/14/2022	BBK	Conferring w/ JSY and AX re oppositions to Daubert motions.	0.1	
2/14/2022	BBK	Reviewing investigator memo re: outreach to potential witnesses and reporting on same to RBGG team.	0.2	
2/14/2022	BBK	Emailing w/ investigator re: witness outreach.	0.1	
2/14/2022	BBK	Reviewing AX memo to team re legal research on BD alter ego and unity of interests.	0.2	
2/14/2022	AX	Meeting with GCG re alter ego and corporate control research and memo.	0.5	
2/14/2022	AX	Call with Travis Close re evidence for corporate control issues.	0.5	
2/14/2022	AX	Correspondence w/ KC re meeting with GCG.	0.1	
2/14/2022	AX	Review changes and finalize memo to send to team.	2.2	
2/14/2022	EH	Correspondence with team re potential class member outreach.	0.2	
2/15/2022	GCG	Emails to RS and team re putative class member calls and outreach.	0.1	
2/15/2022	JSY	Errata for ML; emails re same.	0.8	
2/15/2022	JSY	Emails re outreach to class members.	0.1	
2/15/2022	JSY	Review opp to extension motion.	0.1	
2/15/2022	BBK	Emailing w/ P. Lindstrom re reviewing/correcting deposition transcript.	0.1	
2/15/2022	BBK	Conferring by phone w/ P. Lindstrom re reviewing/correcting deposition transcript.	0.2	
2/15/2022	BBK	Reviewing comm'ns w/ co-counsel re responding to outreach from putative class members and family.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/15/2022	BBK	Drafting declaration of daughter of BD Windsor former resident.	0.5	
2/15/2022	KES	Review notes re task related to ownership issue and confer R. Steyer re same.	0.5	
2/16/2022	GCG	Email from GW re expert payment and review same.	0.1	
2/16/2022	GCG	Review court order re Daubert motion and class cert hearing.	0.1	
2/16/2022	GCG	Conf w/ KES re same.	0.1	
2/16/2022	JSY	Emails re order re extension for Daubert motions.	0.1	
2/16/2022	JSY	Complete ML errata.	0.4	
2/16/2022	JSY	Review Daubert motions.	0.2	
2/16/2022	BBK	Conferring w/ P. Lindstrom re reviewing/correcting deposition transcript and meeting re same.	0.2	
2/16/2022	BBK	Reviewing Defendants' Opposition to Motion for EOT to oppose Daubert motion and court order granting Plaintiffs' extension request.	0.2	
2/16/2022	BBK	(Billing Judgment) Reviewing Senior Housing News article on BD finances and ownership/control over facilities distributed by EH.	0.0	0.1
2/16/2022	BBK	Preparing declaration for daughter of former BD Windsor resident.	2.2	
2/16/2022	EH	(Billing Judgment) organizing news article re defendants to file.	0.0	0.2
2/16/2022	KES	Calendar new deadlines for oppositions to Daubert motion and class cert hearing.	0.4	
2/16/2022	KES	Download expert depo transcript and upload to TextMap.	0.3	
2/16/2022	KES	Begin review of documents in Relativity relating to payments, discounts etc in connection with ownership issue.	4.2	
2/17/2022	JSY	Emails re potential declarant.	0.1	
2/17/2022	BBK	Drafting declaration for daughter of former BD Windsor resident.	2.0	
2/17/2022	BBK	Updating RBGG team re declaration for daughter of former BD Windsor resident.	0.1	
2/17/2022	BBK	Conferring w/ daughter of former BD Windsor resident re FU call to revise declaration.	0.2	
2/17/2022	BBK	Reviewing letter from resident of BD Brea seeking to provide declaration ISO class cert.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/17/2022	KES	Continue review of documents relating to payments, discounts, etc; download documents and begin memo re same.	4.8	
2/18/2022	GCG	Team meeting re discovery for reply and Daubert motions.	0.6	
2/18/2022	GCG	Emails to AX re meeting re corporate issues.	0.1	
2/18/2022	BBK	Reviewing M. Johnson proposal re subpoena to DSS re BD plans of operations.	0.1	
2/18/2022	BBK	Reviewing M. Johnson draft discovery letter brief seeking algorithm used to calculate BD norms.	0.2	
2/18/2022	AX	Team meeting re case tasks and related email correspondence.	0.7	
2/18/2022	AX	Email correspondence w/ team re ownership issues.	0.4	
2/18/2022	AX	Draft memo on evidence re ownership issues.	1.5	
2/18/2022	EH	(Reduced Charge) weekly meeting with co-counsel re case issues.	0.7	0.3
2/18/2022	EH	Revising analysis of DSS citations against Brookdale.	0.8	
2/18/2022	KES	Continue review and summary of documents relating to Brookdale payments, discounts etc in connection with ownership issue.	3.6	
2/18/2022	KES	(Reduced Charge) Team meeting re class cert motion, Daubert oppositions.	0.7	0.3
2/19/2022	GCG	Attend to expert invoices; email DM and GW re same.	0.1	
2/21/2022	GCG	Emails to DM and GW re experts.	0.1	
2/22/2022	GCG	Conf w/ KES, BU and AX re direct liability w/ Brookdale for facility actions.	0.6	
2/22/2022	GCG	Follow up confs w/ AX and KES re further legal and factual development to prepare for class cert. opp.	0.3	
2/22/2022	JSY	Conf. w/ AX re operations plans MTC; emails with MTJ re same.	0.2	
2/22/2022	JSY	Review Daubert motions.	0.5	
2/22/2022	BBK	Emailing w/ R. Carlson re corrections to deposition transcript.	0.1	
2/22/2022	BBK	Reviewing Defendants letter re draft discovery letter brief seeking production of algorithm for BD Norms.	0.1	
2/22/2022	BBK	Reviewing AX report re meeting w/ GCG and K. Stebner re approach for proving ownership of CA BD facilities.	0.1	
2/22/2022	AX	Prepare for call with KS, BU re corporate control issues.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/22/2022	AX	Call with KS, BU, GCG re corporate control and consultant issues.	0.6	
2/22/2022	AX	Discussion with GCG re same.	0.2	
2/22/2022	AX	Email correspondence w/ team re call.	0.3	
2/22/2022	AX	Review team correspondence with opposing counsel re discovery issues.	0.2	
2/22/2022	KES	Download and organize research documents from co-counsel.	0.2	
2/23/2022	GCG	Review documents reflecting Brookdale ownership.	0.2	
2/23/2022	GCG	Confs w/ KES and email to team re same.	0.3	
2/23/2022	GCG	Conf w/ and emails to JSY re deposition coding and Daubert motions.	0.2	
2/23/2022	GCG	Review MJ letter brief re interrogatory responses.	0.2	
2/23/2022	GCG	Email to GW, MJ and KS re management agreements.	0.1	
2/23/2022	JSY	Review Daubert motions; conf. w/ GCG re same.	0.8	
2/23/2022	JSY	Emails re issue tags for depos.	0.1	
2/23/2022	BBK	Conferring w/ R. Carlson re meeting on corrections to deposition transcript.	0.2	
2/23/2022	BBK	Reviewing P. Lindstrom deposition transcript to ID any corrections needed.	2.6	
2/23/2022	BBK	Reviewing B. Umpierre and R. Steyer comm'ns re outreach from putative class member.	0.1	
2/23/2022	BBK	Reviewing M. Johnson draft discovery letter brief seeking responses to B. Jestrabek-Hart interrogatories.	0.2	
2/23/2022	BBK	Reviewing KES analysis re named Plaintiff payments made to BD corporate rather than individual facilities.	0.1	
2/24/2022	GCG	Conf w/ GW re class cert opp and reply and corp. control consultant.	0.3	
2/24/2022	GCG	Emails to JSY and team re same and re coding deposition transcripts to prepare for class cert reply.	0.3	
2/24/2022	JSY	Call with MTJ re Plans of Operation letter brief.	0.3	
2/24/2022	JSY	Emails re interview with potential witness.	0.1	
2/24/2022	JSY	Emails re issue tags for depos; review same.	0.3	
2/24/2022	JSY	Draft MTC re Plans of Operation; research re same.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/24/2022	BBK	Conferring w/ RBGG team re issue tagging deposition transcripts.	0.1	
2/24/2022	BBK	Reviewing M. Johnson letter to opposing counsel re joint discovery letter brief on labor benchmark formula and Ds' response thereto.	0.1	
2/24/2022	BBK	Reviewing P Lindstrom deposition transcript to identify corrections.	1.3	
2/24/2022	BBK	Meeting w/ P. Lindstrom re corrections to deposition transcript.	0.8	
2/24/2022	BBK	Emailing w/ P. Lindstrom re 2nd meeting on corrections to deposition transcript.	0.1	
2/24/2022	BBK	Emailing w/ PI re invoice for work so far and update on witness outreach.	0.1	
2/24/2022	KES	Follow up email to team re ACH payments to Brookdale and review docs re same.	0.5	
2/24/2022	KES	Review and reorganize TextMap issue tags; enter issue tags into TextMap and email team re same.	1.7	
2/24/2022	KES	Download and organize Stiner depo exhibits.	0.3	
2/25/2022	GCG	Emails to JSY, BU, RS and team re deposition coding and plaintiff outreach.	0.2	
2/25/2022	JSY	Emails re deposition transcript tagging.	0.2	
2/25/2022	JSY	Draft and edit letter brief re Plans of Operation; emails re same.	1.0	
2/25/2022	BBK	Conferring w/ JSY and KES re issue tagging named Plaintiff deposition transcripts.	0.1	
2/25/2022	BBK	Reviewing JSY draft discovery letter brief seeking production of plans of operation.	0.1	
2/25/2022	BBK	Reviewing R Carlson deposition transcript to identify corrections.	2.7	
2/25/2022	BBK	Meeting w/ P. Lindstrom re corrections to depo transcript.	0.5	
2/25/2022	BBK	Drafting information for inclusion in errata sheet for P Lindstrom depo transcript.	0.3	
2/25/2022	BBK	(Billing Judgment) Comm. re preparing errata sheet for P Lindstrom depo transcript; reviewing/correcting same.	0.0	0.2
2/25/2022	BBK	(Billing Judgment) Preparing/sending to P. Lindstrom DocuSign for Certificate of Witness and Errata Sheet for depo transcript.	0.0	0.3

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/25/2022	BBK	Reviewing MJ FU w/ opposing counsel re inadequate/incomplete production of resident files and management agreements as ordered by Court.	0.1	
2/25/2022	BBK	Emailing w/ investigator re invoice and witness outreach.	0.1	
2/25/2022	BBK	(Billing Judgment) Attending to processing of invoice.	0.0	0.1
2/25/2022	BBK	Reviewing PI memo re recent comm'ns w/ potential witnesses and reporting to RBGG litigation team re same.	0.2	
2/25/2022	BBK	Reviewing MJ draft discovery letter brief seeking to compel production of docs responsive to RFP Set 6 12-18.	0.1	
2/25/2022	AX	Call with Bernie Jestrabek-Hart re letter from Schneider Wallace, email to RS re outreach.	0.2	
2/25/2022	KES	Issue code Algarme transcript Vol 1 and create reports re same; email team re same.	3.3	
2/26/2022	BBK	(Billing Judgment) Saving signed errata sheet from P. Lindstrom and conferring w/ her re same.	0.0	0.1
2/28/2022	GCG	Conf w/ JSY re discovery letter brief.	0.1	
2/28/2022	BBK	Preparing for meeting w/ R. Carlson re deposition transcript corrections.	0.2	
2/28/2022	BBK	Phone meeting w/ R. Carlson re case and deposition transcript corrections.	1.1	
2/28/2022	BBK	(Billing Judgment) Comm. re creating errata sheet for R. Carlson deposition and reviewing/approving same.	0.0	0.2
2/28/2022	BBK	Serving P. Lindstrom errata sheet on court reporter and Defendants.	0.1	
2/28/2022	BBK	(Billing Judgment) Preparing/sending Certificate of Witness and Errata Sheet to R. Carlson via DocuSign.	0.0	0.2
2/28/2022	BBK	Reviewing/responding to M. Johnson query re BD regulatory reportable events report.	0.1	
2/28/2022	BBK	(Billing Judgment) Emailing w/ R. Carlson re signed certificate of witness and errata sheet for deposition.	0.0	0.1
2/28/2022	BBK	Serving R. Carlson errata sheet on court reporter and Defendants.	0.1	
3/1/2022	BBK	Analyzing disability access expert report re BD Windsor in prep for FU meeting w/ daughter of BD Windsor former resident.	0.5	
3/1/2022	BBK	Meeting w/ daughter of BD Windsor former resident re declaration ISO class cert.	1.0	
3/1/2022	BBK	Revising draft declarant of daughter of former BD Windsor resident based on meeting re same.	1.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 552

SERVICES

Date	Person	Description of Services	Hours	Discount
3/1/2022	BBK	Conferring w/ AX re draft declaration of daughter of former BD Windsor resident.	0.2	
3/1/2022	AX	Email correspondence w/ team re residency agreement language in class member declaration for reply and related review of declaration.	0.4	
3/2/2022	GCG	Conf w/ MJ and KES and email to GW re compilation and analysis of architectural Barriers.	0.3	
3/2/2022	BBK	Revising draft decl from daughter of BD Windsor resident per AX comments.	0.3	
3/2/2022	BBK	Revising R. Steyer report re outreach by BD to putative CMs.	0.1	
3/2/2022	BBK	Conferring w/ RBGG team re analyzing access barriers identified by G. Waters and J. Martin.	0.1	
3/2/2022	AX	Correspondence w/ team re case tasks.	0.2	
3/2/2022	AX	Draft memo on corporate control issues and facts for reply.	1.5	
3/2/2022	KES	Draft master barrier list.	1.5	
3/3/2022	GCG	Review JSY report re deposition of potential witness.	0.1	
3/3/2022	GCG	Email to MJ and defendants re document production ordered by court.	0.1	
3/3/2022	JSY	T/C with rep. of potential witness.	0.3	
3/3/2022	JSY	Email to team re call with rep. of potential of witness and next steps.	0.6	
3/3/2022	BBK	Conferring w/ JSY and AX re interview of potential witness.	0.1	
3/3/2022	BBK	Reviewing JSY report to litigation team re call w/ rep. of potential witness.	0.1	
3/3/2022	BBK	Reviewing M. Johnson FU emails w/ Ds re failure to produce outstanding docs as ordered by Court and failure to response to Pls' pending draft joint discovery letter briefs.	0.1	
3/3/2022	BBK	Reviewing e-notifications of filing of BD's opposition to class cert motion and supporting documents and conferring w/ team re same.	0.1	
3/3/2022	AX	Review opposition filings.	1.0	
3/3/2022	AX	Email correspondence w/ RS re intake interviews and checks.	0.1	
3/3/2022	KES	Download and circulate opposition brief and portion of supporting docs.	1.3	
3/3/2022	KES	Continue work on barrier list creation; begin formatting.	2.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/4/2022	GCG	Prepare for and conduct meetings w/ SW and RBGG teams to plan reply pleadings, index of ECF filings and deposition strategy.	2.0	
3/4/2022	GCG	Emails to JSY and team re same.	0.5	
3/4/2022	GCG	Initial review of opposition.	0.5	
3/4/2022	JSY	Multiple calls with KES re issues with Defs' filing.	0.3	
3/4/2022	JSY	Team meetings re Defs' Opp. to class cert.	1.6	
3/4/2022	JSY	Emails re increasing numbers of depos.	0.1	
3/4/2022	JSY	Review Defs' Opposition and related documents; emails re same.	2.4	
3/4/2022	BBK	Conferring w/ RBGG team re filing of opposition to class cert motion.	0.1	
3/4/2022	BBK	Conferring w/ RBGG team re outreach to witnesses and seeking decls ISO class cert.	0.1	
3/4/2022	BBK	Conferring w/ RBGG team re filing responses to BD's sealing motions.	0.1	
3/4/2022	BBK	Reviewing Ds' appendix of exhibits for opposition to class cert.	0.1	
3/4/2022	BBK	Reviewing opposition to class cert.	1.0	
3/4/2022	BBK	Reviewing G. Wallace email re initial thoughts on response to Ds' argument re: BD as holding company for individual communities.	0.1	
3/4/2022	BBK	Emailing w/ co-counsel re immediate tasks to prepare reply ISO class cert.	0.1	
3/4/2022	BBK	Meeting w/ co-counsel re preparing reply ISO class cert.	1.4	
3/4/2022	BBK	Conferring w/ AX re opp to class cert motion.	0.1	
3/4/2022	BBK	Emailing w/ co-counsel re admissions re BD operating communities on website and investor materials.	0.1	
3/4/2022	BBK	RBGG team meeting re preparing for reply ISO class cert.	0.4	
3/4/2022	BBK	Emailing w/ co-counsel re missing expert resume for staffing expert.	0.1	
3/4/2022	BBK	Reviewing JSY email to Ds requesting to stipulate to additional depositions and for dates of availability for deposing Ds' experts.	0.1	
3/4/2022	BBK	Drafting filing checklist for Reply ISO class cert.	0.3	
3/4/2022	AX	Review opposition filings.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/4/2022	AX	Team meeting re strategy for Reply.	1.4	
3/4/2022	AX	Email correspondence w/ team re investor relations statements.	0.4	
3/4/2022	AX	Email correspondence w/ team re drafting index.	0.5	
3/4/2022	EH	Meeting with team re happy camper depositions, defendant's opposition, discovery, etc.	1.4	
3/4/2022	EH	Reviewing and organizing to file filed pleadings for defendants' opposition to class cert.	1.7	
3/4/2022	EH	Confer with GCG, JSY, BBK, AX, and KES re internal steps for reply to def's class cert opposition.	0.6	
3/4/2022	EH	Reviewing and organizing to file ownership cites from Brookdale investor relationship website.	0.4	
3/5/2022	GCG	Review and analyze defendants' opposition brief.	1.1	
3/5/2022	GCG	Emails to GW, BU and BBK re ADA issues.	0.2	
3/6/2022	GCG	Review JSY and AX emails re sealing objections.	0.1	
3/6/2022	JSY	Review documents re sealing motions; emails with team re same.	0.5	
3/6/2022	BBK	Reviewing AX report re index of opposition to class cert motion and supporting docs.	0.1	
3/6/2022	BBK	Reviewing JSY report re filing opposition to Ds' sealing motion.	0.1	
3/6/2022	AX	Update index of class certification opposition filings and related correspondence w/ team.	2.0	
3/6/2022	EH	Reviewing and analyzing defendants' opposition to class cert motion.	1.5	
3/7/2022	GCG	Prepare for and conduct RBGG team meting re reply tasks and motions to compel.	0.8	
3/7/2022	GCG	Follow up emails w/ JSY, AX and MJ re same.	0.3	
3/7/2022	JSY	T/C with KES re various projects re Reply brief.	0.3	
3/7/2022	JSY	Team meeting re case tasks.	0.8	
3/7/2022	JSY	Emails and conf. re sealing issues.	0.2	
3/7/2022	JSY	Update case task list.	0.4	
3/7/2022	JSY	Multiple Conf. w/ GCG and AX re issues re Reply.	0.8	
3/7/2022	JSY	Review documents discovery issues and tasks to prep for Reply; multiple emails and conf. re same.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/7/2022	BBK	Reviewing Ex. 272 to BD's Opposition to class cert motion - summary chart re named Ps.	0.2	
3/7/2022	BBK	Conferring w/ co-counsel re whether to oppose Ds' sealing motion.	0.1	
3/7/2022	BBK	Reviewing comm'ns w/ RBGG team re coding deposition transcript and preparing CaseMap of Exhibits to Opposition to Class Cert Motion.	0.1	
3/7/2022	BBK	Outreach to witnesses re potential declarations.	0.2	
3/7/2022	BBK	Meeting w/ RBGG team re immediate priorities for reply ISO class cert.	0.8	
3/7/2022	BBK	TC w/ potential witness.	0.1	
3/7/2022	BBK	Updating RBGG team re TC.	0.1	
3/7/2022	BBK	Conferring w/ KES re searching Relativity for discovery relating to potential witness.	0.1	
3/7/2022	BBK	Conferring w/ JSY re letter brief seeking additional depositions.	0.1	
3/7/2022	BBK	Reviewing emails between JSY and M. Johnson re immediate discovery-related tasks.	0.1	
3/7/2022	BBK	Reviewing JSY updated case to do list for reply ISO class cert.	0.1	
3/7/2022	BBK	Reviewing MJ FU emails to opposing counsel re: outstanding discovery.	0.1	
3/7/2022	AX	Team meeting re strategy for Reply.	0.8	
3/7/2022	AX	Review updates and correspondence re case tasks list.	0.2	
3/7/2022	AX	Email correspondence re deposition coding.	0.2	
3/7/2022	AX	Email correspondence re discussion with Brookdale HWD.	0.1	
3/7/2022	AX	Email correspondence w/ consultant re corporate control.	0.1	
3/7/2022	AX	Review email correspondence re discovery issues.	0.4	
3/7/2022	AX	Confer with JSY re cases for deposing absent class members and related legal research.	0.8	
3/7/2022	AX	Review Opposition documents.	0.8	
3/7/2022	EH	Call with team re class cert opposition.	0.9	
3/8/2022	GCG	Emails to JSY and team re briefing re more than 10 depositions and meet and confer re documents defendants refuse to produce.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/8/2022	GCG	Emails to AX and team re meeting w/ consultant and preparation for same.	0.1	
3/8/2022	JSY	Calls to potential witness; emails with team re same.	0.2	
3/8/2022	JSY	Calls re document organization on CaseMap.	0.2	
3/8/2022	JSY	Review transcript and order re Defs' refusal to produce documents re disciplinary actions; draft email to Defs re same; emails with team re same.	1.2	
3/8/2022	JSY	Research re increasing depo limit; multiple emails with team re same.	1.8	
3/8/2022	BBK	Reviewing opposing counsel email refusing to produce discovery re cross-trained non-caregiver staff and staff evaluations/assessments as ordered by Court and conferring w/ co-counsel re responding to same.	0.2	
3/8/2022	BBK	Reviewing co-counsel comm'ns re opposing Daubert motions and reply declarations.	0.1	
3/8/2022	AX	Call with Loresia Vallette re deposition errata (.2).	0.2	
3/8/2022	AX	Review deposition transcript for errata (.7).	0.7	
3/8/2022	AX	Review team correspondence re discovery issues (.5).	0.5	
3/8/2022	AX	Email correspondence w/consultant and team re meeting (.5).	0.5	
3/8/2022	AX	Review evidence on Brookdale corporate control and related correspondence with team (.5).	0.5	
3/8/2022	LHW	Organize Orangevale Barrier List to Excel.	0.6	
3/9/2022	JSY	Team meeting re tasks for Reply brief.	1.2	
3/9/2022	JSY	Emails re draft RFP responses; conf. w/ AX re same.	0.2	
3/9/2022	JSY	Emails re missing exhibits from Defs' filing.	0.2	
3/9/2022	JSY	Emails re depo limit.	0.2	
3/9/2022	BBK	Reviewing AX comments on draft RFPs.	0.1	
3/9/2022	BBK	Co-counsel meeting on Reply ISO class cert.	1.2	
3/9/2022	BBK	(Billing Judgment) Updating/distributing to team filing checklist for Reply ISO class cert.	0.0	0.2
3/9/2022	BBK	Reviewing comm'ns w/ team re omitted exhibits from Ds' opposition to class cert.	0.1	
3/9/2022	AX	Review draft RFPs and email correspondence re same with team.	0.5	
3/9/2022	AX	Attend team meeting re discussion of Reply.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/9/2022	AX	Circulate notes from team meeting with cocounsel.	0.3	
3/9/2022	LHW	Organize Barrier Lists for: (1) Orangevale; (2) Rancho Mirage; and (3) Riverside to Excel.	2.5	
3/10/2022	GCG	Confs w/ JSY and KES re barrier summaries and discovery disputes related to reply pleadings.	0.2	
3/10/2022	JSY	Conf. w/ GCG re status of projects.	0.1	
3/10/2022	JSY	Conf. w/ KES re barrier list and other issues.	0.2	
3/10/2022	JSY	Emails re discovery issues; review local rules re same.	0.5	
3/10/2022	JSY	Emails re outreach to class members.	0.1	
3/10/2022	BBK	Preparing for interview w/ potential witness (including analyzing Relativity docs and planning questions).	1.5	
3/10/2022	BBK	Reviewing JSY-MJ comm'ns re FU w/ Ds re outstanding sections of discovery letter briefs; reviewing MJ FU w/ Ds re same.	0.1	
3/10/2022	BBK	Failed attempts to reach potential witness.	0.2	
3/10/2022	BBK	Conferring w/ G. Wallace and R. Steyer re draft decl of daughter of former BD Windsor resident.	0.2	
3/10/2022	BBK	Revisions to draft decl of daughter of former BD Windsor resident per G. Wallace and R. Steyer comments.	0.2	
3/10/2022	BBK	(Billing Judgment) Attending to updating master caption to include David Marks law firm.	0.0	0.1
3/10/2022	BBK	Interview w/ potential witness.	1.3	
3/10/2022	AX	Review deposition transcript for errata.	1.2	
3/10/2022	LHW	Organize Barrier Lists for (1) Riverside; (2) Riverwalk; and (3) Roseville to Excel.	2.3	
3/11/2022	GCG	Conf w/ JSY re reply tasks and discovery disputes.	0.1	
3/11/2022	JSY	Conf. w/ GCG re case tasks.	0.1	
3/11/2022	JSY	Call with AX re case issues including documents for expert and letter brief re depos.	0.4	
3/11/2022	JSY	Emails re former employee declarations.	0.2	
3/11/2022	JSY	Emails re new RFP set.	0.2	
3/11/2022	JSY	Research and draft letter brief re deposition limit; emails re same.	4.7	
3/11/2022	JSY	Emails re meet and confer time.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/11/2022	BBK	Reviewing comm'ns w/ opposing counsel re M&C on depositions and failure to provide responses to latest set of RFPs and ROGs (and internal comm'ns re same).	0.1	
3/11/2022	BBK	Reviewing jSY / M. Johnson / B. Umpierre comm'ns re whether to file additional set of RFPs prior to Reply ISO Class Cert, and comm'ns w/ JSY/AX re same.	0.2	
3/11/2022	BBK	Drafting/sending report to RBGG team re interview with potential witness.	0.4	
3/11/2022	BBK	Conferring w/ RBGG BD team re whether to pursue declaration from potential witness.	0.2	
3/11/2022	BBK	Conferring w/ JSY & AX re plan for issue tagging Rule 30(b)(6) deposition transcripts.	0.1	
3/11/2022	BBK	Reviewing M. Johnson - M. Jacobsen comm'ns re Ds outstanding production of docs ordered produced and weeks-late Ds' sections of joint discovery letter briefs.	0.1	
3/11/2022	BBK	Reviewing JSY draft discovery letter brief re Pls' request for additional depositions.	0.1	
3/11/2022	BBK	Reviewing AX report re analysis of BD's class cert opposition arguments re lack of corporate control.	0.1	
3/11/2022	AX	Review opposition and analyze corporate control arguments.	2.0	
3/11/2022	AX	Communications with team re additional document requests.	0.6	
3/11/2022	AX	Draft chart re corporate control evidence.	1.5	
3/11/2022	AX	Email communications with team re M&C sessions.	0.1	
3/11/2022	AX	Review draft letter briefs.	0.3	
3/11/2022	AX	Review team communications re ED declaration.	0.2	
3/11/2022	LHW	Organize Barrier List for San Jose to Excel.	1.0	
3/12/2022	GCG	Review and analyze opposition pleadings to prepare for Reply work.	1.2	
3/13/2022	GCG	Review and revise draft discovery letter brief re Benchmark Software.	0.2	
3/13/2022	GCG	Review AX chart of evidence and index of pleadings filed in support of opposition.	0.2	
3/13/2022	GCG	Prepare for call w/ consultant re corporate control.	0.2	
3/13/2022	GCG	Review case law re standards applicable to CLRA claims.	0.2	
3/13/2022	GCG	Review and analyze Brookdale admissions in Answer re control over facilities.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 559

SERVICES

Date	Person	Description of Services	Hours	Discount
3/13/2022	GCG	Emails to GW and JSY re same.	0.2	
3/13/2022	JSY	Emails re admissions in Defs' Answer.	0.1	
3/13/2022	BBK	Reviewing revised joint discovery letter brief seeking production of manner in which BD norms are calculated.	0.2	
3/13/2022	BBK	Reviewing GCG report to team re BD admissions re corporate ownership/operation of CA facilities in answer.	0.1	
3/13/2022	AX	Draft errata for Loresia Vallette deposition (.8) and email communications with client re signature (.2).	1.0	
3/14/2022	GCG	Review and revise MJ memo re corporate control issues.	0.4	
3/14/2022	GCG	Meet w/ GW, MJ and AX re same.	0.7	
3/14/2022	GCG	Emails to JSY and team re legal research needed for reply.	0.2	
3/14/2022	GCG	Conf w/ and email to BBK re happy camper depositions and witness declarations.	0.2	
3/14/2022	JSY	Conf. w/ GCG and messages with AX re declaration re ownership.	0.2	
3/14/2022	JSY	Emails re letter briefs; review same.	0.1	
3/14/2022	BBK	Reviewing AX memo re facts/admissions showing BD is operator/manager of its CA facilities.	0.2	
3/14/2022	BBK	Meeting w/ GCG re BBK tasks ISO Class Cert Reply.	0.2	
3/14/2022	BBK	Conferring w/ RBGG team re deposition outline for "happy camper" declarants.	0.1	
3/14/2022	BBK	Reviewing AX report re plan to demonstrate BD's operator/manager status for CA facilities.	0.1	
3/14/2022	AX	Meeting with GCG, GW, MJ re corporate control issues.	0.7	
3/14/2022	AX	Meeting with consultants MJ, GW re same.	0.3	
3/14/2022	AX	Calls with Loresia Vallette re deposition errata.	0.2	
3/14/2022	AX	Review deposition transcript and related tasks for deposition errata.	1.2	
3/14/2022	AX	Team correspondence re Reply tasks.	0.3	
3/15/2022	GCG	Meet w. AX, BBK and JSY re legal research, deposition review and declarations needed for reply.	0.5	
3/15/2022	GCG	Emails to MJ and team re discovery letter briefs for reply.	0.3	
3/15/2022	JSY	Meeting with team re case tasks; conf. w/ AX and BBK re depo review.	0.9	
3/15/2022	JSY	Emails re Daubert opposition filings.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/15/2022	JSY	Emails re deposition review.	0.2	
3/15/2022	JSY	Emails re PI outreach.	0.1	
3/15/2022	JSY	Draft agenda for M+C; emails re same.	0.2	
3/15/2022	JSY	Edit draft letter brief re depositions.	0.3	
3/15/2022	BBK	RBGG team meeting re prep for Reply ISO class cert.	0.5	
3/15/2022	BBK	Meeting w/ JSY and AX re issue tagging of 30b6 deposition transcripts.	0.2	
3/15/2022	BBK	Emailing w/ RBGG team re authorizing additional PI outreach to former BD employees.	0.1	
3/15/2022	BBK	Conferring w/ PI M. Evashevski re authorizing additional outreach to former BD employees.	0.1	
3/15/2022	BBK	Updating filing checklist for Reply ISO class cert.	0.1	
3/15/2022	BBK	Emailing w/ RBGG team re plan for issue coding deposition transcripts.	0.1	
3/15/2022	AX	Team email correspondence re case tasks, including evidentiary objections, tagging depositions, chart of evidence, legal standards for CLRA and Elder Abuse.	0.5	
3/15/2022	AX	Attorney team meeting re case tasks.	0.5	
3/15/2022	AX	Prepare for M&C call.	0.4	
3/15/2022	AX	Email correspondence re M&C call.	0.3	
3/15/2022	AX	Discussion with JSY, BBK re deposition coding and other tasks.	0.3	
3/15/2022	AX	Email correspondence w/ team re deposition coding training.	0.1	
3/15/2022	AX	Review draft letter brief.	0.2	
3/15/2022	EH	Correspondence with team re coding depositions.	0.2	
3/15/2022	EH	Organizing to file pleadings and circulating same.	0.3	
3/15/2022	LHW	Organize Barrier Lists for (1) San Jose; and (2) San Juan Capistrano to Excel.	1.3	
3/16/2022	GCG	Prepare for and conduct meetings w/ SW and KS and team and Separately RBGG team.	0.8	
3/16/2022	GCG	Email to GW and team re corporate control documents and evidence.	0.1	
3/16/2022	GCG	Conf w/ JSY re meet and confer w/ defendants.	0.1	
3/16/2022	JSY	Call with AX and MTJ re plan for meet and confer.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 561

SERVICES

Date	Person	Description of Services	Hours	Discount
3/16/2022	JSY	Meet and confer call with MJ re various discovery issues.	1.0	
3/16/2022	JSY	Call with KES re filing Daubert oppositions.	0.1	
3/16/2022	JSY	Team meeting re current case tasks.	1.0	
3/16/2022	JSY	Review Defs' sections of letter briefs.	0.3	
3/16/2022	JSY	Meeting to discuss depo review project.	0.3	
3/16/2022	JSY	Review depo transcripts.	0.7	
3/16/2022	BBK	Reviewing co-counsel comm'ns re Ds' draft letter brief on resident communications.	0.1	
3/16/2022	BBK	Meeting w/ EH/JSY/AX re issue tagging deposition transcripts.	0.2	
3/16/2022	BBK	Emailing co-counsel updated Reply Filing Checklist.	0.1	
3/16/2022	BBK	Meeting w/ co-counsel on prep for Reply ISO Class Cert.	0.7	
3/16/2022	BBK	Meeting w/ RBGG team on prep for Reply ISO Class Cert.	0.2	
3/16/2022	BBK	Reviewing admissions re BD's operation/management of its facilities in Feb 2022 earning results investor publication.	0.1	
3/16/2022	BBK	Reviewing JSY notes from 3/16 meet and confer w/ Ds on discovery disputes.	0.1	
3/16/2022	AX	Call with JSY, MJ re strategy for M&C call.	0.5	
3/16/2022	AX	Prepare for M&C call.	0.8	
3/16/2022	AX	M&C call with Michael Jacobsen, JSY, MJ.	1.5	
3/16/2022	AX	Team meeting re strategy for Reply.	1.0	
3/16/2022	AX	Call with team re tagging deposition transcripts.	0.3	
3/16/2022	EH	Team meeting re case updates.	1.0	
3/16/2022	EH	Confer with team re coding witness depositions.	0.2	
3/17/2022	GCG	Conf w/ and email to JSY re motion to seal in support of Daubert oppositions.	0.2	
3/17/2022	GCG	Conf w/ and emails to AX re plan for drafting Wallace declaration and RJN.	0.4	
3/17/2022	GCG	Begin review of Saad declaration.	0.2	
3/17/2022	GCG	Email to BBK re same.	0.1	
3/17/2022	GCG	Email to consultant re memo re corporate control.	0.1	
3/17/2022	GCG	Conf w/ and email w/ attorney for understaffing fall victims.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/17/2022	JSY	Emails re staffing-related lawsuit; review same.	0.2	
3/17/2022	JSY	Emails re sealing motions; conf. re same.	0.4	
3/17/2022	JSY	Conf. with AX re RFP set 8 disputes.	0.2	
3/17/2022	JSY	Review deposition transcripts for Reply.	0.5	
3/17/2022	JSY	Messages re letter briefs.	0.2	
3/17/2022	JSY	Review Opposition and supporting docs.	2.0	
3/17/2022	BBK	Reviewing comm'ns w/ co-counsel and corporate control consultant re analysis of evidence submitted w/ opposition to cert motion.	0.1	
3/17/2022	BBK	Proofing final draft declaration of daughter of former BD Windsor resident.	0.2	
3/17/2022	BBK	Outreach to daughter of former BD Windsor resident re finalizing decl.	0.1	
3/17/2022	BBK	Conferring w/ AX re RJN for Reply ISO Class Cert.	0.1	
3/17/2022	BBK	Issue-tagging 30b6 topic 10 deposition transcript.	1.4	
3/17/2022	BBK	Conferring w/ JSY re issue-tagging 30b6 topic 10 deposition transcript.	0.1	
3/17/2022	BBK	Conferring w/ JSY and AX re addressing Ds' discovery letter brief re resident contacts.	0.2	
3/17/2022	BBK	Conferring w/ KES re Daubert Oppositions for Cross and Kailes.	0.1	
3/17/2022	BBK	Conferring w/ RBGG team re potential sealing motion needed for Daubert Opps for Flores and Schroyer.	0.1	
3/17/2022	BBK	Conferring w/ GCG re Saad Expert decl.	0.1	
3/17/2022	BBK	Reviewing AX notes and report on 3/16 meet and confer w/ Ds.	0.1	
3/17/2022	AX	Discussion with GCG re RJN and Reply declaration.	0.4	
3/17/2022	AX	Email correspondence w/ team re M&C call results.	0.4	
3/17/2022	AX	Confer with team re letter briefs.	0.3	
3/17/2022	AX	Review sample RJNs for Reply and email correspondence w/ team re same.	0.2	
3/17/2022	AX	Draft headings for Reply declaration.	0.3	
3/17/2022	AX	Review memo re corporate control issues.	0.2	
3/17/2022	AX	Correspondence w/ Bernie Jestrabek-Hart and other Scotts Valley resident.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/17/2022	KES	Download and circulate pleadings; brief review of same.	0.4	
3/17/2022	KES	Emails with team re Defs class cert opposition papers.	0.3	
3/17/2022	LHW	Organize Barrier List for San Ramon to Excel.	0.6	
3/18/2022	GCG	Review and analyze Saad declaration.	0.5	
3/18/2022	GCG	Conf w/ BBK and emails to MJ and BBK re Saad disclosures, research and document review.	0.7	
3/18/2022	GCG	Confs w/ and emails to JSY re Daubert opposition briefs.	0.2	
3/18/2022	GCG	Email to LC and MJ re DSS subpoenas for records.	0.1	
3/18/2022	JSY	Multiple conf. w/ KES, BU, and AX re filing Daubert oppositions re Flores and Schroyer.	0.9	
3/18/2022	JSY	Emails re letter brief re depositions.	0.2	
3/18/2022	JSY	Prepare Schroyer and Flores oppositions for filing and sealing motions re same.	5.9	
3/18/2022	JSY	Multiple emails and phone conf. re filing same.	1.0	
3/18/2022	BBK	Reviewing JSY-BU comm'ns re sealing motion for Flores/Schroyer Daubert opps.	0.1	
3/18/2022	BBK	Reviewing G. Maatman email re discovery disputes at impasse & scheduling expert depos; conferring w/ co-counsel re same.	0.1	
3/18/2022	BBK	Conferring w/ co-counsel, GCG and KES re Saad expert doc production.	0.2	
3/18/2022	BBK	Reviewing comm'ns re finalizing/filing Daubert Opps for Flores and Schroyer.	0.2	
3/18/2022	BBK	Reviewing Saad Expert Decl ISO Opposition to Class Cert.	1.6	
3/18/2022	BBK	Meeting w/ GCG re preparing for deposition of Saad.	0.7	
3/18/2022	AX	Legal research re Reply.	1.0	
3/18/2022	AX	Email correspondence w/ team re case tasks.	0.3	
3/18/2022	KES	Download and circulate pleadings.	0.5	
3/18/2022	KES	Review, revise, finalize and file opposition to Flores and Schroyer Daubert Motions; review, redact and serve documents filed under seal re same.	9.0	
3/18/2022	LHW	Review and edit Excel spreadsheet re Barrier Lists for various facilities.	1.5	
3/19/2022	JSY	Emails re Daubert opposition filings.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2022	BBK	Reviewing Opposition to Daubert Motion to exclude Waters and Mastin.	0.4	
3/19/2022	BBK	Reviewing Opposition to Daubert Motion to exclude Kailes.	0.2	
3/19/2022	BBK	Reviewing Opposition to Daubert Motion to exclude Cross.	0.2	
3/20/2022	BBK	Reviewing comm'ns w/ co-counsel re scheduling Saad expert deposition.	0.1	
3/21/2022	GCG	Review and analyze plaintiffs' Daubert oppositions.	0.5	
3/21/2022	GCG	Conf w/ AX re evidence to gather supporting corporate control.	0.1	
3/21/2022	GCG	Review evidence of corporate control for use in reply.	0.7	
3/21/2022	GCG	Conf w/ KS re pleading file.	0.1	
3/21/2022	GCG	Review pleadings filed re sealing.	0.2	
3/21/2022	GCG	Emails to JSY, MJ and team re discovery letter briefs and reply evidence.	0.3	
3/21/2022	JSY	Emails re letter briefs.	0.2	
3/21/2022	JSY	Emails re AX call with BJH and copies of checks.	0.3	
3/21/2022	JSY	Emails re case tasks.	0.1	
3/21/2022	JSY	Review depo transcripts and code issues for Reply.	2.0	
3/21/2022	BBK	Emailing w/ MJ re meeting about Saad Deposition prep.	0.1	
3/21/2022	BBK	Meeting w/ co-counsel re analysis of Saad expert disclosures.	0.3	
3/21/2022	BBK	PC w/ MJ re prep for Saad deposition.	0.2	
3/21/2022	BBK	Conferring w/ JSY and AX re update from B. Jestrabek-Hart.	0.1	
3/21/2022	BBK	Conferring w/ co-counsel and RBGG team re strategy for joint discovery letter briefs.	0.1	
3/21/2022	BBK	Reviewing MJ emails to G. Maatman re scheduling expert depositions.	0.1	
3/21/2022	BBK	Reviewing MJ revisions to Pls' section of joint discovery letter brief seeking responses to Jestrabek-Hart Interrogatories 1-6.	0.1	
3/21/2022	AX	Call with Bernie Jestrabek-Hart re case updates, case issues.	1.0	
3/21/2022	AX	Email correspondence w/ team re same.	0.3	
3/21/2022	AX	Draft Wallace declaration for reply.	1.0	
3/21/2022	AX	Legal research re standards for reply.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/22/2022	GCG	Conf w/ JSY and emails to MJ and team re letter briefs and discovery needed for reply.	0.2	
3/22/2022	GCG	Review and revise AX draft Wallace declaration.	0.2	
3/22/2022	GCG	Confs w/ AX re same and re plan for team meeting.	0.1	
3/22/2022	JSY	Conf. w/ GCG re current case priorities.	0.2	
3/22/2022	JSY	Calls with AX re RFP Set 8 motions to compel.	0.2	
3/22/2022	JSY	Call with EH re deposition review.	0.2	
3/22/2022	JSY	Review letter brief re ROGs; emails re edits to same.	0.3	
3/22/2022	JSY	Revise letter brief re Plans of Operation; emails re same.	2.0	
3/22/2022	JSY	Emails re deposition coding.	0.2	
3/22/2022	BBK	Reviewing JSY-co-counsel comm'ns re revising joint letter brief seeking production of local transportation policies and BD bank accounts.	0.1	
3/22/2022	BBK	Reviewing MJ-G Maatman comm'ns re scheduling depositions of Ds' experts and expert response to SDT.	0.1	
3/22/2022	BBK	Reviewing/commenting on AX draft outline for Wallace cert reply decl.	0.1	
3/22/2022	BBK	Reviewing JSY revisions to Plaintiffs' section of joint letter brief seeking Plans of Operation and co-counsel comments re same.	0.1	
3/22/2022	AX	Draft Wallace declaration for reply.	1.5	
3/22/2022	AX	Draft Wallace declaration.	1.0	
3/22/2022	AX	Call with JSY re M&C issues.	0.2	
3/22/2022	AX	Email correspondence w/ team re M&C issues and analysis of Bernie Jestrabek Hart discovery issues.	1.5	
3/22/2022	AX	Analyze spreadsheets re Brookdale corporate control issues.	0.6	
3/23/2022	GCG	Prepare for and conduct ream meeting w/ co-counsel.	0.6	
3/23/2022	GCG	Conf w/ and emails to AX and JSY re next steps in reply discovery.	0.3	
3/23/2022	JSY	Calls with GCG and AX re class member outreach issues.	0.2	
3/23/2022	JSY	Team meeting re case tasks.	0.7	
3/23/2022	JSY	Emails re motions to compel.	0.2	
3/23/2022	JSY	Emails re management agreement language.	0.2	
3/23/2022	JSY	Review deposition transcripts and code issues for Reply.	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/23/2022	BBK	Reviewing AX proposal re which RFPs and ROGs to move to compel on and JSY/co-counsel comments re same.	0.2	
3/23/2022	BBK	Emails re projects for Reply ISO Class Cert.	0.1	
3/23/2022	BBK	Reviewing Opposition to Daubert Motion v. Kennedy.	0.4	
3/23/2022	BBK	Reviewing Opposition to Daubert Motion v. Flores.	0.3	
3/23/2022	BBK	Reviewing Opposition to Daubert Motion v. Schroyer.	0.4	
3/23/2022	BBK	Meeting w/ co-counsel re tasks to prepare for Reply ISO Class Cert.	0.6	
3/23/2022	BBK	Conferring w/ JSY and AX re tasks to prepare for Reply ISO Class Cert.	0.2	
3/23/2022	BBK	Updating Reply Brief Filing Checklist per today's co-counsel meeting.	0.1	
3/23/2022	BBK	Conferring w/ daughter of former BD Windsor resident re finalizing declaration.	0.2	
3/23/2022	BBK	Conferring w/ J. Thornton re plan for BBK Reply Decl and providing new DSS citations to Flores for review.	0.2	
3/23/2022	BBK	Conferring w/ RBGG team re issue coding deposition transcripts.	0.1	
3/23/2022	BBK	Analyzing Saad Expert Production for deposition prep.	1.5	
3/23/2022	BBK	Reviewing AX report re call w/ blind resident of BD Scotts Valley.	0.1	
3/23/2022	AX	Call with RS re low-vision issues at Scotts Valley.	0.8	
3/23/2022	AX	Email summary to team re RS.	0.3	
3/23/2022	AX	Call with Justin Proctor at SW re corporate control issues.	0.6	
3/23/2022	AX	Meeting with cocounsel re case issues for Reply.	0.7	
3/23/2022	AX	Email correspondence w/ team re discovery issues and Wallace declaration headings.	1.3	
3/23/2022	EH	Weekly team meeting re depositions of happy camper declarants, discovery, opposition reply, etc.	0.6	
3/23/2022	EH	Confer with KES re deposition coding project.	0.2	
3/24/2022	GCG	Conf w/ and email to JSY re motion to allow additional depositions.	0.2	
3/24/2022	GCG	Email w/ AX re interview w/ potential named plaintiff.	0.1	
3/24/2022	JSY	Call with GCG re deposition limit issue.	0.2	
3/24/2022	JSY	Attend discovery hearing.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/24/2022	JSY	Multiple conferences and emails re deposition limit issue and discovery hearing; draft email to Defs re same.	1.0	
3/24/2022	JSY	Review and tag issues in depo transcripts.	1.5	
3/24/2022	JSY	Draft outline for happy camper depositions; emails re same.	2.3	
3/24/2022	BBK	Reviewing Pls' portion of joint discovery letter brief on contacts w/ putative class members.	0.2	
3/24/2022	BBK	Analyzing Saad Expert Production.	1.3	
3/24/2022	BBK	Conferring w/ RBGG team re 3/24 discovery hearing on MTC service alignment formula.	0.1	
3/24/2022	BBK	Reviewing/revising AX updated RBGG Brookdale tasklist.	0.2	
3/24/2022	BBK	Reviewing evidentiary objections filed against happy camper declarants in Heredia v Sunrise.	0.1	
3/24/2022	BBK	Reviewing JSY-BU comm'ns re outline for happy camper depositions.	0.1	
3/24/2022	BBK	Reviewing Court Order denying MTC Service Alignment formula.	0.1	
3/24/2022	BBK	Conferring w/ JSY and R. Steyer re plan to file discovery letter brief seeking additional depositions.	0.1	
3/24/2022	AX	(Billing Judgment) Observe Brookdale hearing on letter brief and confer with JSY re same (.5); update team to-do list (.2).	0.0	0.7
3/24/2022	EH	Coding witness depositions for opposition reply.	0.6	
3/25/2022	GCG	Email to GW and team re SS comments on corporate control issues.	0.1	
3/25/2022	GCG	Conf w/ and emails to JSY re happy camper depositions.	0.2	
3/25/2022	GCG	Email to AX re GW declaration.	0.1	
3/25/2022	GCG	Email to JSY and team re review of agreements and depo coding.	0.1	
3/25/2022	JSY	Call with GCG re case tasks.	0.2	
3/25/2022	JSY	Emails re depo review project.	0.1	
3/25/2022	JSY	Review list of potential deponents; emails re same.	0.4	
3/25/2022	JSY	Draft sample depo outline for happy camper depositions.	3.5	
3/25/2022	BBK	Reviewing comm'ns w/ JSY and co-counsel re plan for FU w/ Ds and filing of letter brief seeking additional depositions.	0.1	
3/25/2022	AX	Review BU memo on corporate control and management agreements and email correspondence w/ team re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/25/2022	AX	Draft Wallace declaration for reply.	1.0	
3/27/2022	GCG	Review defendants' section of deposition letter brief.	0.3	
3/27/2022	GCG	Conf w/ MJ and emails to GW, AX and JSY re same.	0.8	
3/27/2022	GCG	Begin reviewing AX research on exceeding deposition limit.	0.3	
3/27/2022	GCG	Draft response to defendants' section.	0.6	
3/27/2022	GCG	Email to MJ and team re defendants' claim to have produced declarations in discovery.	0.1	
3/27/2022	JSY	Emails re deposition limit letter brief.	0.1	
3/27/2022	AX	Legal research for deposition letter brief.	1.6	
3/27/2022	AX	Review team correspondence re same.	0.2	
3/28/2022	GCG	Research and revise letter brief re depositions of happy camper declarants.	1.4	
3/28/2022	GCG	Confs w/ and emails to KES re cite checking and exhibits.	0.3	
3/28/2022	GCG	Conf w/ RS re declarations.	0.2	
3/28/2022	GCG	Confs w/ MJ and GW and emails to MJ, GW and team re legal and factual research for letter brief and reply.	1.0	
3/28/2022	GCG	Email to JM re changes to letter brief.	0.2	
3/28/2022	BBK	Reviewing GCG-co-counsel comm'ns re revising Ps' section of joint discovery letter brief re additional depos.	0.1	
3/28/2022	BBK	Reviewing revised joint discovery letter brief for additional depositions w/ Ds' section and updated Ps' section.	0.1	
3/28/2022	EH	Reviewing deposition of corporate employee and coding for issues.	2.1	
3/28/2022	KES	Update Toomer depo coding.	0.6	
3/28/2022	KES	Work on barrier lists for reply.	1.0	
3/28/2022	KES	Cite check portion of discovery letter brief and gather statutes and cases re same.	1.1	
3/29/2022	GCG	Review and revise plaintiffs' section of deposition letter brief.	0.6	
3/29/2022	GCG	Emails to GW, MJ, JM and MJ re same.	0.4	
3/29/2022	GCG	Legal and factual research for same.	0.3	
3/29/2022	BBK	Reviewing/responding to updates from investigator re outreach to potential witnesses.	0.2	
3/29/2022	BBK	Reviewing R. Steyer report re proposed happy camper declarants to depose.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/29/2022	BBK	Reviewing B. Umpierre memo re BD management agreement language evidencing BSL control over operations of facilities and AX comments re same.	0.2	
3/29/2022	BBK	Reviewing EH and KES updates re issue tagging of depo transcripts and preparing chart of access barriers identified by Ps' experts.	0.1	
3/29/2022	BBK	Conferring w/ EH re protocols for issue tagging depo transcripts.	0.1	
3/29/2022	BBK	Reviewing comm'ns w/ opposing counsel re finalizing letter briefs re additional depositions and contacts w/ putative CMs.	0.1	
3/29/2022	EH	Coding deposition of corporate employee (DDO) for opposition reply.	0.9	
3/29/2022	EH	Call with BBK re deposition coding.	0.1	
3/29/2022	EH	Coding deposition of corporate employee (previous RVP) for opposition reply.	1.0	
3/30/2022	GCG	Review and revise plaintiffs' section of joint letter brief.	1.4	
3/30/2022	GCG	Conf w/ MJ and emails to GW and team re same.	0.7	
3/30/2022	GCG	Conf w/ and email to AX re further legal research.	0.5	
3/30/2022	GCG	Confs w/ KES re e-filing and courtesy copies.	0.2	
3/30/2022	GCG	Begin preparing for oral argument.	1.0	
3/30/2022	GCG	Email to MJ re same.	0.1	
3/30/2022	GCG	Meet w/ GW and team re reply pleadings.	0.6	
3/30/2022	GCG	Conf w/ BBK and KES re notices of deposition and subpoenas on declarants.	0.2	
3/30/2022	BBK	Conferring w/ RBGG team re preparing/serving deposition subpoenas and notices of deposition for happy camper declarants.	0.2	
3/30/2022	BBK	Reviewing revised joint discovery letter brief seeking additional depositions.	0.1	
3/30/2022	BBK	Reviewing Court Order on Motion to Seal portions of cert motion and supporting docs.	0.1	
3/30/2022	BBK	Conferring w/ KES and GCG re Court Order requiring re-filing of redacted cert motion and service of depo subpoenas on happy camper declarants.	0.2	
3/30/2022	BBK	Reviewing R. Steyer and T. Close report re centralize emergency evacuation presentation.	0.1	
3/30/2022	BBK	Co-counsel meeting re preparing for Reply ISO class cert.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/30/2022	BBK	Emailing w/ RBGG team re immediate tasks for prepping reply ISO class cert.	0.1	
3/30/2022	BBK	Reviewing M. Johnson revisions to joint letter brief on contacts w/ putative class members and exhibits thereto.	0.3	
3/30/2022	BBK	Conferring w/ team re 3/31 hearing on motion to compel additional depositions.	0.1	
3/30/2022	AX	Discuss letter brief research with GCG.	0.3	
3/30/2022	AX	Team meeting re case tasks for Reply.	0.8	
3/30/2022	AX	Call with Travis Close re corporate control issues.	0.2	
3/30/2022	AX	Correspondence w/ team re case tasks.	0.3	
3/30/2022	AX	Review team correspondence re emergency evacuation.	0.2	
3/30/2022	AX	Research re procedure for request for judicial notice.	0.2	
3/30/2022	EH	Confer with KS re joint discovery motions, admin motion to file seal, happy camper depositions.	0.5	
3/30/2022	EH	Research standing orders re courtesy copies.	0.3	
3/30/2022	EH	Weekly meeting with co-counsel re ongoing discovery, sealing motion, etc.	1.0	
3/30/2022	EH	Coding deposition of corporate employee for opposition reply.	2.5	
3/31/2022	GCG	Review cases cited in letter brief re additional depositions.	0.7	
3/31/2022	GCG	Prepare for and participate in hearing before MJ Beeler re additional deposition.	1.8	
3/31/2022	GCG	Conf w/ and emails to BBK re deposition subpoena and notices.	0.3	
3/31/2022	GCG	Review and approve same.	0.2	
3/31/2022	GCG	Review draft letter brief re alleged violations of court's no contact order.	0.2	
3/31/2022	GCG	Emails to MJ, GW and team re same.	0.1	
3/31/2022	GCG	Emails to GW, AX and team re motions for judicial notice and to strike.	0.2	
3/31/2022	BBK	Emailing w/ GCG and EH re arranging for service of deposition subpoenas and booking locations and court reporters for happy camper declarants.	0.3	
3/31/2022	BBK	Conferring w/ team re hearing on MTC additional depositions.	0.1	
3/31/2022	BBK	Planning/preparing depositions of happy campers (including legal research and drafting deposition subpoenas and notice of issuance of subpoenas for same).	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/31/2022	BBK	Meeting w/ GCG re plan for serving depo subpoenas and scheduling happy camper declarant depositions.	0.2	
3/31/2022	BBK	(Billing Judgment) conferring by phone and e-mails w/ court reporter services to book court reporters and locations for first four happy camper declarant depositions.	0.0	0.8
3/31/2022	BBK	(Billing Judgment) conferring by phone w/ process server company re service of deposition subpoenas on first four happy camper declarants.	0.0	0.1
3/31/2022	BBK	(Billing Judgment) emailing w/ RBGG team re arrangements for depositions of first four happy camper declarant depositions.	0.0	0.2
3/31/2022	BBK	Reviewing AX-GCG-G Wallace comm'ns re procedural issues for filing of RJN and Motion to Strike to be heard together w/ class cert motion and Daubert motions.	0.1	
3/31/2022	AX	Legal research re declarant/absent class member depositions.	0.3	
3/31/2022	AX	Attend discovery hearing before Judge Beeler.	0.4	
3/31/2022	AX	Confer with GCG re same.	0.2	
3/31/2022	AX	Research procedural issues for filing RJN and related correspondence with team.	1.0	
3/31/2022	AX	Confer with EH re admin motion to seal.	0.2	
3/31/2022	AX	Email correspondence w/ team re sealing class cert in accordance with order.	0.2	
3/31/2022	AX	Review sealing order and related document and correspondence with team.	0.8	
3/31/2022	AX	Confer with GCG re same.	0.1	
3/31/2022	EH	Finalizing courtesy copies to court re joint discovery brief.	0.7	
3/31/2022	EH	Reviewing court's sealing order re class cert motion.	0.5	
3/31/2022	EH	Drafting appendix of documents from court's recent order re class cert sealing motion (1.1) and correspondence with AX re same (.3).	1.4	
3/31/2022	EH	Revising subpoenas for depositions of Defs' resident declarants.	0.5	
3/31/2022	EH	Coding deposition of corporate employee for opposition reply.	1.4	
3/31/2022	GZG	(Billing Judgment) Help EH send out chambers copy of filing.	0.0	0.3
4/1/2022	GCG	Research and draft Wallace declaration re corporate control.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/1/2022	GCG	Meet w/ BBK, AX and EH to discuss Wallace declaration and other reply pleadings.	0.5	
4/1/2022	GCG	Review notice of depo and subpoenas.	0.2	
4/1/2022	GCG	Conf w/ Brookdale counsel MJ re sealing issues and Brookdale's omitted documents.	0.2	
4/1/2022	GCG	Emails w/ BBK re service of subpoenas.	0.3	
4/1/2022	GCG	Review MJ Beeler discovery order.	0.1	
4/1/2022	GCG	Conf w/ BBK and email to defendants re service of deposition subpoenas.	0.3	
4/1/2022	GCG	Conf w/ and email to GW and email to partners re Sunrise decision, expert costs and case prospects.	0.3	
4/1/2022	GCG	Email w/ M. Jacobsen re defendants' sealing request.	0.1	
4/1/2022	GCG	Research re implications of sunrise decision.	0.3	
4/1/2022	GCG	Conf w/ and email to BK re same.	0.2	
4/1/2022	GCG	Email w/ CN re VP operations.	0.1	
4/1/2022	SJR	Emails to and conference with GCG re status.	0.2	
4/1/2022	BBK	Reviewing Ds' objections to subpoena to Saad.	0.1	
4/1/2022	BBK	Reviewing AX report to team re plan for making redactions and re-filing cert motion and supporting papers to comply w/ Court's Order on sealing motion.	0.1	
4/1/2022	BBK	Reviewing GCG-co-counsel comm'ns re Ds' revisions to letter brief on contacts w/ CMs.	0.1	
4/1/2022	BBK	(Billing Judgment) emailing w/ court reporter service re finding locations/court reporters for first four happy camper depos.	0.0	0.1
4/1/2022	BBK	(Billing Judgment) conferring w/ EH re confirmation of court report and location for first 4 happy camper depos.	0.0	0.1
4/1/2022	BBK	(Billing Judgment) Creating three additional deposition subpoenas and notice of issuance of same.	0.0	0.2
4/1/2022	BBK	Reviewing GCG emails re additional evidence to include re corporate control in Wallace Reply Decl.	0.1	
4/1/2022	BBK	Reviewing GCG report to team re M. Jacobsen call re sealing and FU email to M. Jacobsen re same.	0.1	
4/1/2022	BBK	Meeting w/ RBGG team re immediate tasks for Reply ISO class cert.	0.6	
4/1/2022	BBK	Emailing w/ M. Johnson re prep for Saad deposition.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/1/2022	BBK	Reviewing Order granting Pls' additional depositions and conferring w/ GCG re FU w/ Ds re same.	0.2	
4/1/2022	BBK	Attending to finalizing depo subpoenas and notice of issuance of same, providing instructions to service of process provider.	1.0	
4/1/2022	BBK	(Billing Judgment) attending to serving Ds w/ notice of issuance of deposition subpoenas for 4 happy camper depos.	0.0	0.2
4/1/2022	BBK	Conferring w/ GCG re scheduling and serving subpoenas for next 12 happy camper depositions.	0.3	
4/1/2022	BBK	Attending to scheduling next 12 happy camper depositions.	0.9	
4/1/2022	BBK	(Billing Judgment) conferring w/ service of process company regarding contacting process server to provide instructions on serving deposition subpoenas.	0.0	0.1
4/1/2022	BBK	Conferring w/ process server to provide instructions on serving deposition subpoenas.	0.2	
4/1/2022	BBK	Reviewing EH update re progress on redactions to comply w/ court order on sealing motion for class cert briefing and supporting docs.	0.1	
4/1/2022	AX	Meeting with RBGG team.	0.5	
4/1/2022	AX	Correspondence with EH and review draft request for judicial notice.	0.8	
4/1/2022	AX	Review discovery order.	0.1	
4/1/2022	AX	Confer with EH re sealing filings and review drafts.	0.6	
4/1/2022	AX	Review team correspondence re deposition notices.	0.2	
4/1/2022	AX	Review documents and draft Wallace declaration.	1.5	
4/1/2022	EH	Scheduling depositions of resident deponents for class cert reply.	0.8	
4/1/2022	EH	Call with AX re sealing motion.	0.2	
4/1/2022	EH	Call with team re case updates, deposition scheduling, sealing motion.	0.8	
4/1/2022	EH	Drafting and finalizing notices of depos and subpoenas for resident witnesses.	1.1	
4/1/2022	EH	Redacting class cert materials for sealing motion.	2.5	
4/2/2022	GCG	Emails to BBK re depositions of Residents.	0.1	
4/2/2022	GCG	Research re corporate control issues for Wallace Declaration.	0.1	
4/2/2022	JSY	Emails re happy camper depo outline.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/2/2022	BBK	(Billing Judgment) conferring w/ GCG re booking location for happy camper deposition in Santa Rosa and FU w/ court reporter service re same.	0.0	0.1
4/3/2022	GCG	Research re banking issues for use in proving corporate control for class cert. motion.	0.1	
4/3/2022	BBK	Conferring w/ daughter of former BD Windsor resident re finalizing declaration ISO cert motion.	0.1	
4/3/2022	BBK	Reviewing Ds' revisions to joint letter briefs seeking (1) to compel responses to B. Jestrabek-Hart interrogatories; and (2) seeking production of BD's plans of operation for CA facilities.	0.1	
4/4/2022	GCG	Meet w/ JSY, BBK, AX and EH to plan upcoming depositions and work on letter brief and class cert declarations.	0.7	
4/4/2022	GCG	Emails to GW and team re same.	0.2	
4/4/2022	GCG	Emails to MJ re sealing request and letter briefs.	0.2	
4/4/2022	GCG	Conf w/ AX re banking issue and named plaintiff.	0.2	
4/4/2022	GCG	Review and revise defendants' proposed stipulation re sealing documents inadvertently omitted from Vick declaration.	0.3	
4/4/2022	GCG	Conf w/ EH re sealing process.	0.1	
4/4/2022	JSY	Emails re team meeting and letter briefs.	0.1	
4/4/2022	JSY	Team meeting.	0.6	
4/4/2022	JSY	Call with GCG re status of case tasks.	0.2	
4/4/2022	JSY	Emails re happy camper depositions.	0.2	
4/4/2022	JSY	Multiple emails re subpoenas and deposition arrangements for happy camper depositions.	0.3	
4/4/2022	JSY	Emails re sealing issues.	0.2	
4/4/2022	JSY	Emails re happy camper deposition outline edits.	0.2	
4/4/2022	JSY	Emails re discovery responses.	0.1	
4/4/2022	JSY	Review edits to letter brief re plans of operation; research re same; revise same.	1.8	
4/4/2022	JSY	Multiple emails re same.	0.2	
4/4/2022	BBK	Conferring w/ process service re status of attempting service on first 4 happy camper depos.	0.2	
4/4/2022	BBK	Meeting w/ RBGG team re happy camper depositions and responding to order on sealing motion.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/4/2022	BBK	Reviewing GCG - M. Jacobsen comm'ns re additional info Ds' seek to seal from cert motion and Ds' proposed stipulation re same.	0.1	
4/4/2022	BBK	Attending to scheduling remaining 12 happy camper depositions.	2.7	
4/4/2022	BBK	Attending to creating deposition subpoenas and notices of issuance of same for 12 happy camper depositions.	0.5	
4/4/2022	BBK	Conferring w/ service of process company re serving depo subpoena for BD Paulin Creek deponent.	0.2	
4/4/2022	BBK	Attending to service of notice of issuance of depo subpoena for BD Paulin Creek deponent on BD.	0.1	
4/4/2022	BBK	FU w/ service of process company re POS for deposition subpoenas for first four happy camper depos.	0.1	
4/4/2022	BBK	Reviewing/revising EH draft tracker for happy camper depositions.	0.1	
4/4/2022	BBK	Conferring w/ EH re tracking happy camper depositions.	0.1	
4/4/2022	BBK	Reviewing comm'ns w/ co-counsel re finalizing joint discovery letter briefs to compel responses to B. Jestrabek-Hart interrogatories and production of plans of operation.	0.1	
4/4/2022	BBK	Conferring w/ AX and R. Steyer re staffing happy camper depositions.	0.1	
4/4/2022	AX	Meeting with JSY, EH, GCG, BBK re depositions.	0.5	
4/4/2022	AX	Review deposition outline template for happy campers.	0.3	
4/4/2022	AX	Team correspondence re Wallace declaration.	0.5	
4/4/2022	AX	Team correspondence re sealing issues.	0.5	
4/4/2022	EH	Issue coding deposition for class cert reply.	1.0	
4/4/2022	EH	(Billing Judgment) correspondence with court reporting services to schedule depositions.	0.0	1.7
4/4/2022	EH	Co-counsel call re case tasks for reply.	0.6	
4/4/2022	EH	Redactions for class cert sealing motion.	2.1	
4/4/2022	EH	Drafting and finalizing depo notices, subpoenas for resident deponents and proof of service re same.	1.8	
4/5/2022	GCG	Review and revise stipulation re sealing.	0.2	
4/5/2022	GCG	Email to MJ re same.	0.1	
4/5/2022	GCG	Conf w/ BBK and JSY re call from daughter of declarant.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/5/2022	GCG	Confs and emails w/ BBK and JSY re serving deposition notices.	0.5	
4/5/2022	GCG	Emails to AX and team re unsealing certain pleadings and redacting others in response to court order.	0.1	
4/5/2022	GCG	Review and revise deposition outline.	0.1	
4/5/2022	GCG	Review and revise BBK communication to defendants re contact w/ deponents.	0.1	
4/5/2022	GCG	Emails to AX re call re plaintiff check.	0.1	
4/5/2022	JSY	Multiple meetings and conversations re deposition scheduling and issues with happy camper depositions.	1.5	
4/5/2022	JSY	Edit letter brief re Plans of Operation; emails re same.	0.2	
4/5/2022	JSY	Edit depo outline.	1.0	
4/5/2022	JSY	Conf. w/ GCG re same.	0.3	
4/5/2022	JSY	Emails re same.	0.2	
4/5/2022	BBK	Conferring w/ service of process company re instructions for service on Santa Rosa declarant/deponent.	0.3	
4/5/2022	BBK	Identifying backup happy camper to depose in BD Folsom.	0.2	
4/5/2022	BBK	Conferring by phone w/ daughter of BD North Euclid happy camper deponent who called office.	0.1	
4/5/2022	BBK	Conferring w/ RBGG team re call from daughter of BD North Euclid happy camper deponent.	0.2	
4/5/2022	BBK	Meeting w/ JSY and GCG re addressing call from daughter of BD North Euclid happy camper deponent.	0.3	
4/5/2022	BBK	Drafting report to co-counsel re call from daughter of BD North Euclid happy camper deponent and w/ proposed email re same to opposing counsel.	0.5	
4/5/2022	BBK	Conferring w/ JSY, AX, and RLS re staffing happy camper depositions.	0.1	
4/5/2022	BBK	Reviewing comm'ns w/ co-counsel re revisions to happy camper deposition outline.	0.1	
4/5/2022	BBK	Conferring by phone w/ process server re instructions for service on Santa Rosa happy camper declarant.	0.2	
4/5/2022	BBK	Conferring w/ JSY and GCG re happy camper depositions.	0.2	
4/5/2022	BBK	Meeting w/ JSY, AX, and RLS re staffing happy camper depositions.	0.7	
4/5/2022	BBK	Reviewing AX update re obtaining evidence from bank of BLS endorsing rent checks.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 577

SERVICES

Date	Person	Description of Services	Hours	Discount
4/5/2022	BBK	(Billing Judgment) attending to scheduling 11 happy camper depositions (including conferring w/ court reporter services re same).	0.0	3.1
4/5/2022	BBK	Attending to finalizing depo subpoenas and notices for 10 happy camper depositions.	0.3	
4/5/2022	BBK	Providing instructions to service of process company for service of 10 deposition subpoenas.	0.4	
4/5/2022	BBK	Serving notices of issuance of deposition subpoenas for 10 happy camper depositions on BD.	0.2	
4/5/2022	BBK	Conferring w/ EH and JSY re updating tracker of happy camper depositions.	0.1	
4/5/2022	AX	Call with Bernie Jestrabek-Hart and Wells Fargo re Brookdale check endorsement issue.	2.5	
4/5/2022	AX	Email correspondence w/ team re same.	0.2	
4/5/2022	AX	Call with JSY, BBK, RS re happy camper depositions.	1.0	
4/5/2022	AX	Review EH redactions to class cert motion and draft chart re sealing/redactions.	1.5	
4/5/2022	EH	Research re RJN examples for reply class cert motion.	0.3	
4/5/2022	EH	Confer with BBK depo scheduling and subpoenas.	0.4	
4/5/2022	EH	Correspondence with team re sealing motion and defendants' proposed redactions.	0.4	
4/5/2022	EH	Correspondence with court reporting services re deposition locations, timeline, etc.	1.2	
4/5/2022	EH	Revising deposition tracking spreadsheet and correspondence with team re same.	0.7	
4/5/2022	EH	Redactions to declaration for sealing motion.	0.6	
4/5/2022	EH	Drafting depo subpoenas and NODs and finalizing same.	1.5	
4/6/2022	GCG	Conf w/ and emails to M. Jacobsen re status of stipulation and proposed order.	0.3	
4/6/2022	GCG	Review and revise defendants' proposed order.	0.2	
4/6/2022	GCG	Confs w/ and emails to MJ, AX and KES re sealing and redaction issues.	1.0	
4/6/2022	GCG	Draft and revise Grunfeld Declaration ISO sealing.	1.5	
4/6/2022	GCG	Email to/from court room deputy re sealing issues.	0.2	
4/6/2022	GCG	Review unredacted and redacted motion for filing in accordance w/ March 30 order.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2022	GCG	Conf w/ and emails to BBK re service of deposition subpoenas and interaction w/ daughter of deponent.	0.5	
4/6/2022	GCG	Meet w/ RS, BBK, JSY and AX to prepare for putative class member depositions.	2.0	
4/6/2022	GCG	Revise deposition outline.	0.7	
4/6/2022	GCG	Meet w/ co-counsel to plan reply pleadings.	1.0	
4/6/2022	GCG	Review Brookdale expert disclosure.	0.2	
4/6/2022	JSY	Declarant depo. prep meeting and prepare for same.	2.5	
4/6/2022	JSY	(Billing Judgment) Emails re travel for depositions; research re same.	0.0	0.3
4/6/2022	JSY	Team meeting.	0.8	
4/6/2022	JSY	Edit deposition outline.	0.6	
4/6/2022	JSY	Multiple conversations re issues with declarant depositions.	0.5	
4/6/2022	BBK	Conferring w/ RBGG team re status of completing redactions to cert motion and supporting docs to comply w/ Court's order on sealing motion.	0.1	
4/6/2022	BBK	Conferring w/ co-counsel and RBGG team re sealing issues.	0.2	
4/6/2022	BBK	Attending to scheduling additional happy camper depositions (including comm'ns w/ court reporter services and EH re same).	0.9	
4/6/2022	BBK	Reviewing draft outline for happy camper depositions.	0.2	
4/6/2022	BBK	Deposition preparation meeting w/ GCG, JSY, AX and RLS.	1.6	
4/6/2022	BBK	Conferring w/ process server company re serving depo subpoenas on happy camper declarants.	0.7	
4/6/2022	BBK	Conferring w/ process servers re instructions for service prior to entering BD facilities.	0.5	
4/6/2022	BBK	Reviewing/revising depo subpoena, notice of issuance of same, and POS for additional happy camper depositions.	0.2	
4/6/2022	BBK	Attending to service of two notices of issuance deposition subpoena and withdrawal of 3rd notice on Ds.	0.2	
4/6/2022	BBK	Reviewing G. Maatman e-mail re BD not representing/accepting service for happy camper deponents and drafting proposed response to same.	0.3	
4/6/2022	BBK	Conferring w/ GCG re responding to call from daughter of happy camper declarant at BD North Euclid.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2022	BBK	Responding by phone to call from daughter of happy camper declarant at BD North Euclid.	0.2	
4/6/2022	BBK	Drafting/sending report to litigation team re call w/ daughter of happy camper declarant at BD North Euclid.	0.2	
4/6/2022	BBK	Preparing for call w/ daughter of former BD Windsor resident re decl ISO class cert.	0.1	
4/6/2022	BBK	Phone call w/ daughter of former BD Windsor resident re decl ISO class cert.	0.2	
4/6/2022	BBK	Emailing w/ daughter of former BD Windsor resident re finalizing decl ISO class cert.	0.1	
4/6/2022	BBK	Emailing w/ KES re notices for depositions of happy campers.	0.1	
4/6/2022	BBK	Conferring by phone w/ KES & EH re notices for depositions of happy campers.	0.2	
4/6/2022	BBK	Meeting w/ co-counsel re key tasks for Reply ISO Class Cert.	0.7	
4/6/2022	BBK	Conferring w/ JSY and AX re happy camper depositions and Saad depo.	0.2	
4/6/2022	BBK	Emailing M. Johnson re Saad depo.	0.1	
4/6/2022	BBK	Reviewing comm'ns regarding preparing GCG declaration re sealing.	0.1	
4/6/2022	BBK	Reviewing GCG decl ISO stipulation re additional redactions.	0.1	
4/6/2022	BBK	Reviewing comm'ns w/ opposing counsel re finalizing 3 pending joint letter discovery briefs.	0.1	
4/6/2022	AX	Email correspondence with EH, team re sealing filing and review redactions.	0.3	
4/6/2022	AX	Team meeting with JSY, RS, BBK, GCG re strategy for happy camper depositions and related issues.	1.2	
4/6/2022	AX	Team meeting with co counsel and RBGG team re Reply and related case issues.	1.0	
4/6/2022	AX	Review, revise, and file Grunfeld declaration and related issues re filing motion for class certification under seal in accordance with court order.	3.0	
4/6/2022	AX	Draft Wallace Reply declaration.	0.5	
4/6/2022	EH	Confer with AX re sealing motion.	0.2	
4/6/2022	EH	Confer with KES re sealing motion and depo subpoenas.	0.4	
4/6/2022	EH	Confer with BBK and KES re scheduling depos.	0.2	
4/6/2022	EH	Meeting with team re tasks for reply.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/6/2022	EH	Revise deposition tracking spreadsheet.	0.4	
4/6/2022	EH	Drafting and finalizing depo subpoenas and NODs.	0.6	
4/6/2022	EH	Correspondence with court reporting services re depo locations and timeline.	0.4	
4/6/2022	KES	Review status of depo notices and service; confer EH and BBK re same.	0.8	
4/6/2022	KES	Review, revise, finalize and efile re-redacted motion for class cert per court order.	4.5	
4/7/2022	GCG	Research and revise deposition outline for upcoming depositions.	0.4	
4/7/2022	GCG	Confs w/ JSY and emails to BBK re same and re service on deponents and competence issues.	0.2	
4/7/2022	GCG	Conf w/ KES re barrier analysis and reply exhibits.	0.2	
4/7/2022	GCG	Review and analyze exhibits and facts for Wallace declaration re corporate control.	0.7	
4/7/2022	GCG	Meet w/ JSY, AX, BBK and RS to prepare for happy camper depositions.	1.3	
4/7/2022	GCG	Emails to GW, MJ and team re upcoming depositions, letter brief and reply pleadings.	0.5	
4/7/2022	GCG	Confs w/ KES and emails to BBK re contact from one declarant and service on another.	0.3	
4/7/2022	GCG	Run conflicts checks on new B. attorneys.	0.1	
4/7/2022	JSY	Depo prep meeting.	0.3	
4/7/2022	JSY	Emails and messages re depositions.	0.5	
4/7/2022	JSY	Edit depo outline; emails re same.	0.8	
4/7/2022	BBK	Attending to logistics for happy camper depositions (including comm'ns w/ process servers and w/ EH/KES re scheduling substitute depositions).	1.3	
4/7/2022	BBK	Investigating whether DSS citations are issued to licensee or BSL and reporting to team re same.	0.2	
4/7/2022	BBK	Conferring w/ EH re tracking deposition scheduling and service of subpoenas.	0.2	
4/7/2022	BBK	Drafting proposed declaration for daughter/POA of happy camper declarant re withdrawal of same.	0.7	
4/7/2022	BBK	Conferring w/ GCG re approach to obtaining signed statements re withdrawal of happy camper declarations.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/7/2022	BBK	Conferring w/ JSY/AX/RSL re attorney staffing for happy camper depositions.	0.2	
4/7/2022	BBK	Drafting/sending proposal to replace BD Uptown Whittier declarant; conferring w/ team re same.	0.3	
4/7/2022	BBK	Reviewing comm'ns w/ co-counsel re access barrier list and G. Wallace Reply Decl.	0.1	
4/7/2022	BBK	Conferring w/ co-counsel re 30b6 Topic 10 testimony and other evidence regarding BD's centralized Family & Connections Hotline for resident complaints.	0.4	
4/7/2022	BBK	Assessing/proposing substitute happy camper declarants to depose.	0.2	
4/7/2022	BBK	Conferring w/ team re attempting to locate/serve BD Gardens of Tarzana declarant.	0.3	
4/7/2022	BBK	Conferring w/ KES re next steps for locating/serving former BD Gardens of Tarzana resident.	0.2	
4/7/2022	BBK	PC w/ BD Paulin Creek resident who called re noticed 4/15 deposition.	0.5	
4/7/2022	BBK	Drafting report/recommendation for RBGG team re PC w/ BD Paulin Creek resident who called re noticed 4/15 deposition.	0.3	
4/7/2022	BBK	Conferring w/ KES and EH re serving notice of deposition on BD and issuing deposition subpoena for substitute BD Folsom declarant.	0.1	
4/7/2022	BBK	Conferring w/ JSY and AX re outreach to BD re accommodating blind/WC-using declarant at BD Paulin Creek who requests to have deposition at facility.	0.1	
4/7/2022	BBK	Conferring w/ JSY and AX re accommodations for blind/WC-using declarant at BD Paulin Creek to read exhibits and participate in deposition.	0.2	
4/7/2022	BBK	Deposition preparation meeting w/ GCG/AX/JSY/RSL.	1.3	
4/7/2022	AX	Team meeting with GCG, BBK, RS re deposition prep.	1.4	
4/7/2022	AX	Review deposition outline.	0.5	
4/7/2022	AX	Team correspondence re depositions.	0.8	
4/7/2022	AX	Team correspondence re complaint hotline.	0.3	
4/7/2022	AX	Review Rule 23(f) petition for Sunrise.	0.2	
4/7/2022	AX	Review documents and draft Wallace declaration in support of Reply.	1.5	
4/7/2022	CEJ	(Billing Judgment) Conflicts check.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 582

SERVICES

Date	Person	Description of Services	Hours	Discount
4/7/2022	EH	Confer with KES re NODs and class member depositions.	0.3	
4/7/2022	EH	Revising happy camper deposition tracker.	0.4	
4/7/2022	EH	Outreach to court reporting services re deposition locations and timeline.	0.6	
4/7/2022	EH	Revising NODs and depo subpoenas; finalize same.	0.9	
4/7/2022	EH	Correspondence with BBK re depo subpoenas and notices.	0.4	
4/7/2022	EH	Schedule and calendar resident depositions for class cert reply.	0.5	
4/7/2022	KES	Update electronic files.	0.3	
4/7/2022	KES	Follow up with co-counsel re barrier list project.	0.3	
4/7/2022	KES	Emails with team re declarant depo status and logistics; emails with court reporter and process server re same.	1.0	
4/7/2022	KES	Westlaw research re possible new address for deponents.	4.0	
4/8/2022	GCG	Further revisions to deposition outline for declarants' depositions.	0.8	
4/8/2022	GCG	Confs w/ CW, MJ and JSY and emails to RS and team re preparation for depositions and withdrawal of certain declarations.	1.0	
4/8/2022	GCG	Revise letter to declarant who seeks to withdraw declaration.	0.2	
4/8/2022	GCG	Conf w. declarant whose mother is incompetent.	0.1	
4/8/2022	GCG	Emails to MJ and team re changes to letter briefs.	0.1	
4/8/2022	GCG	Conf w/ and email to KES re service of subpoena on "back up" deponent.	0.1	
4/8/2022	GCG	Conf w/ and email to JSY re notification to opposing counsel re changes in deposition schedule.	0.1	
4/8/2022	GCG	Legal and factual research for reply brief.	0.1	
4/8/2022	GCG	Email w/ DA and BK re same.	0.1	
4/8/2022	JSY	Emails re letter brief re plans of operation.	0.1	
4/8/2022	JSY	Multiple calls and emails re communications with deponents and withdrawals of declarations; draft withdrawal documents and letters re same.	3.0	
4/8/2022	JSY	Calls with process server.	0.2	
4/8/2022	JSY	Call with GCG re deposition issues.	0.1	
4/8/2022	JSY	Emails re deposition schedule.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/8/2022	BBK	Phone calls w/ daughter of subpoenaed happy camper deponent re taking depo off calendar and withdrawing declaration.	0.2	
4/8/2022	BBK	Reviewing POA and letter of incompetence for subpoenaed happy camper deponent shared by daughter.	0.1	
4/8/2022	BBK	Conferring w/ team re FU w/ daughter of subpoenaed happy camper declarant re obtaining statement withdrawing declaration and taking depo off calendar.	0.1	
4/8/2022	BBK	Reviewing comm'ns w/ co-counsel re statements withdrawing declarations for happy camper deponents.	0.1	
4/8/2022	BBK	Reviewing comm'ns re withdrawing deposition subpoena for deceased happy camper declarant and identifying/subpoenaing substitute.	0.1	
4/8/2022	BBK	Reviewing comm'ns re responding to opposing counsel email regarding noticed depositions for week of 4/11.	0.1	
4/8/2022	BBK	Conferring w/ process server company and EH re signed POSs for first three deposition subpoenas.	0.1	
4/8/2022	EH	Correspondence with JSY re happy camper depositions.	0.2	
4/8/2022	EH	Revising happy camper deposition tracking chart.	0.4	
4/8/2022	KES	Calendar motion deadlines and email team re same.	0.3	
4/8/2022	KES	(Billing Judgment) Participate in portion of Zoom meeting with Mastin and Waters.	0.0	0.3
4/8/2022	KES	Follow up re possible new service address for deponent and arrange skip trace.	1.5	
4/8/2022	KES	Review status of service of depo subpoenas.	0.2	
4/8/2022	KES	Draft, finalize and arrange for service of replacement deponent.	2.0	
4/8/2022	KES	Confer team re service of depo notices.	0.5	
4/9/2022	GCG	Emails to MJ, GW and MJ re Saad notice of deposition and document request.	0.1	
4/10/2022	GCG	Emails to MJ, RS, JSY and team re happy camper depositions and GM notice of declarant unavailability.	0.3	
4/10/2022	JSY	Emails re deposition schedule and issues with deposition prep.	0.4	
4/10/2022	JSY	Edit deposition outline for B. Williams deposition.	0.6	
4/10/2022	BBK	Reviewing co-counsel comm'ns re responding to G. Maatman emails re happy camper depositions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2022	EH	Organizing to file proofs of services re resident deposition subpoenas.	0.4	
4/10/2022	EH	Correspondence with court reporting services re depositions.	0.3	
4/11/2022	GCG	Conf w/ AX re Wallace Declaration.	0.1	
4/11/2022	GCG	Email w/ MJ re SAAD deposition response.	0.1	
4/11/2022	GCG	Review court order re sealing issues.	0.1	
4/11/2022	GCG	Conf w/ KES and emails to AX and team re same.	0.2	
4/11/2022	GCG	Confs w/ JSY, AX and BBK re first declarant deposition.	0.4	
4/11/2022	GCG	Emails to GW, MJ and BBK re response to JM re depositions.	0.2	
4/11/2022	GCG	Emails to KES and team re noticing additional depositions in response to cancellations.	0.3	
4/11/2022	GCG	Emails to BBK re communications w/ defendants' counsel re depositions of declarants.	0.2	
4/11/2022	JSY	Call with GCG, BBK, AX re deposition.	0.3	
4/11/2022	JSY	Call with RS and KES re deposition.	0.2	
4/11/2022	JSY	Call with GCG re prep for deposition.	0.1	
4/11/2022	JSY	(Reduced Charge) Travel to and from Ontario for deposition.	4.7	4.8
4/11/2022	JSY	Prep for deposition with RS.	1.0	
4/11/2022	JSY	Deposition of B. Williams.	1.5	
4/11/2022	BBK	Reviewing skip trace for happy camper declarant no longer living at BD Gardens of Tarzana and reporting to team on findings.	0.1	
4/11/2022	BBK	Conferring w/ GCG re happy camper depositions, withdrawal of declaration statements, and responding to G. Maatman 4/6 and 4/10 emails re happy camper depos.	0.2	
4/11/2022	BBK	Conferring w/ KES re immediate tasks for arranging happy camper depositions and sending withdrawal of declaration statements.	0.2	
4/11/2022	BBK	PC w/ daughter/POA of happy camper declarant regarding declaration withdrawal statement.	0.1	
4/11/2022	BBK	Preparing/sending declaration withdrawal statement to daughter/POA of happy camper declarant.	0.2	
4/11/2022	BBK	Conferring w/ KES re amended notices of deposition for any happy camper depositions that change location or day/time.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 585

SERVICES

Date	Person	Description of Services	Hours	Discount
4/11/2022	BBK	Drafting proposed response to G. Maatman 4/6 and 4/11 emails re happy camper declarations.	1.1	
4/11/2022	BBK	Conferring w/ JSY/KES/AX re problems w/ happy camper depositions.	0.2	
4/11/2022	BBK	Conferring w/ process server company re service attempts on happy camper declarants.	0.1	
4/11/2022	BBK	Phone call w/ GCG/JSY/AX re debrief of 4/11 happy camper deposition and next steps.	0.3	
4/11/2022	BBK	Revising draft email response to G. Maatman 4/6 and 4/10 emails re happy depositions per GCG and co-counsel comments and sending same.	0.2	
4/11/2022	BBK	Conferring w/ RBGG team re depositions and court reporters.	0.2	
4/11/2022	BBK	PC w/ BD Folsom happy camper declarant regarding BD's refusal to accommodate request to have deposition take place at his facility.	0.1	
4/11/2022	BBK	Attending to scheduling substitute happy camper depositions and serving subpoenas and notices re same (including conferring w/ team re same).	0.5	
4/11/2022	BBK	Reviewing M. Johnson M&C email w/ opposing counsel re Ds' objections to appearing for Saad deposition.	0.1	
4/11/2022	BBK	Identifying/proposing substitute happy camper depositions and conferring w/ team re same.	0.4	
4/11/2022	BBK	Reviewing Court Order requiring 2d sealing motion due to Ds' failure and conferring w/ team re complying with same.	0.1	
4/11/2022	BBK	Reviewing signed declaration withdrawal statement rec'd from daughter/POA of happy camper declarant and sharing w/ team.	0.1	
4/11/2022	AX	Email correspondence w/ team re sealing motion and reviewing sealing order.	0.5	
4/11/2022	AX	Review case law and circulate.	0.3	
4/11/2022	AX	Email correspondence w/ team re happy camper deposition notices and related issues.	0.8	
4/11/2022	AX	Meeting with GCG, JSY, BBK re Benny Williams deposition and related correspondence.	0.5	
4/11/2022	AX	Review email correspondence from team and opposing counsel re Saad deposition.	0.1	
4/11/2022	AX	Review documents and draft Wallace declaration.	3.0	
4/11/2022	KES	Emails with court reporting service and team re remote depo issues and logistics for upcoming depos.	1.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 586

SERVICES

Date	Person	Description of Services	Hours	Discount
4/11/2022	KES	Follow up re status of service of depo subpoenas and further investigation efforts; emails with team re replacement deponents and review contact information re same; send correspondence in connection with depos.	3.8	
4/12/2022	GCG	Confs w/ JSY and emails to BBK and team re deposition withdrawals and notices.	0.4	
4/12/2022	GCG	Email to MJ and RS re plan for exhibits at deposition.	0.1	
4/12/2022	GCG	Email to RS and team re deposition no show.	0.1	
4/12/2022	GCG	Emails to AX and team re Wallace declaration and related pleadings.	0.1	
4/12/2022	GCG	Emails to MJ and GM re Saad deposition.	0.1	
4/12/2022	GCG	Email to GW and team re other expert depositions.	0.1	
4/12/2022	GCG	Email to AX and team re sealing motion.	0.1	
4/12/2022	JSY	Call with son of Brookdale declarant re deposition.	0.1	
4/12/2022	JSY	Team meeting re depositions.	0.4	
4/12/2022	JSY	Call with GCG re status of case tasks; emails re same.	0.1	
4/12/2022	JSY	Emails re no show deponent.	0.1	
4/12/2022	JSY	Review related case.	0.2	
4/12/2022	JSY	Multiple conf. and emails about issues with depositions.	0.5	
4/12/2022	JSY	Prepare withdrawal statement for son of resident re same.	1.7	
4/12/2022	BBK	Reviewing comm'ns w/ opposing counsel re logistics for Jacobsen and Saad expert depositions.	0.1	
4/12/2022	BBK	Reviewing R Steyer updates re 4/12 happy camper deposition.	0.1	
4/12/2022	BBK	Meeting w/ RBGG team re happy camper depositions.	0.3	
4/12/2022	BBK	Planning/preparing schedule for happy camper deponents for week of 4/25.	0.6	
4/12/2022	BBK	Conferring w/ process server company re service of deposition subpoenas (and w/ KES/EH re same).	0.2	
4/12/2022	BBK	Reviewing KES report re call w/ court reporter service re deposition logistics.	0.1	
4/12/2022	BBK	Conferring w/ AX and EH re identifying additional substitute happy camper deponents and scheduling depositions/preparing subpoenas for same.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 587

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2022	BBK	Conferring w/ KES re notices of depositions to opposing counsel.	0.1	
4/12/2022	BBK	Meeting w/ AX re comm'ns w/ representatives of happy camper declarants.	0.2	
4/12/2022	BBK	Notifying opposing counsel re happy camper depositions coming off calendar.	0.2	
4/12/2022	BBK	Conferring w/ JSY and AX re scheduling happy camper depositions.	0.2	
4/12/2022	BBK	Drafting/sending update to team re happy camper depo status and tracking of same.	0.2	
4/12/2022	BBK	Reviewing/commenting on draft cover letter for deposition subpoenas for happy camper declarants.	0.1	
4/12/2022	BBK	Reviewing JSY report on call w/ son/POA of BD Folsom happy camper declarant.	0.1	
4/12/2022	BBK	Conferring by phone w/ BD Paulin Creek happy camper declarant.	0.4	
4/12/2022	BBK	Drafting report/recommendation to team re PC w/ BD Paulin Creek happy camper declarant.	0.2	
4/12/2022	BBK	Reviewing/revising EH draft withdrawal of declaration statement and cover letter for BD Paulin Creek happy camper declarant.	0.2	
4/12/2022	BBK	Reviewing e-mail and VM from daughter of BD Monrovia happy camper declarant re deposition.	0.1	
4/12/2022	BBK	Conferring w/ JSY re FU w/ daughter of BD Monrovia happy camper declarant.	0.2	
4/12/2022	BBK	Conferring by phone w/ daughter of BD Monrovia happy camper declarant re deposition.	0.1	
4/12/2022	BBK	Drafting report/recommendation to team re PC w/ daughter of BD Monrovia happy camper declarant.	0.2	
4/12/2022	BBK	Preparing for PC w/ attorney for subpoenaed BD Monrovia happy camper declarant.	0.1	
4/12/2022	BBK	Leaving VM for attorney for subpoenaed BD Monrovia happy camper declarant and reporting same to team.	0.1	
4/12/2022	BBK	Conferring by phone w/ medical POA for subpoenaed BD Irvine happy camper declarant.	0.4	
4/12/2022	BBK	Drafting report/recommendation re FU after PC w/ medical POA for subpoenaed BD Irvine happy camper declarant; conferring w/ team re same.	0.3	
4/12/2022	BBK	Drafting email to medical POA for subpoenaed BD Irvine happy camper declarant enclosing statement filed by BD.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2022	BBK	Reviewing email from attorney for son/conservator of subpoenaed BD Alhambra happy camper declarant re incapacity to be deposed.	0.1	
4/12/2022	BBK	Conferring by phone w/ attorney for son/conservator of subpoenaed BD Alhambra happy camper declarant.	0.2	
4/12/2022	BBK	Drafting report/recommendation to team regarding FU after PC w/ attorney for son/conservator of subpoenaed BD Alhambra happy camper declarant.	0.2	
4/12/2022	BBK	Drafting email to attorney for son/conservator of subpoenaed BD Alhambra happy camper declarant re deposition and enclosing statement filed by BD.	0.2	
4/12/2022	BBK	Emailing daughter of former BD Windsor resident re reply decl ISO cert.	0.1	
4/12/2022	BBK	Reviewing/sharing w/ team reply decl ISO cert signed by daughter of former BD Windsor resident.	0.2	
4/12/2022	BBK	Reviewing court order denying D's motion regarding contacts w/ putative class members and conferring w/ co-counsel re same.	0.1	
4/12/2022	AX	Meeting with RBGG team re scheduling class member depositions and related issues.	0.5	
4/12/2022	AX	Email correspondence with team re class member depositions and related issues.	0.8	
4/12/2022	AX	Review happy camper declarations and related information and compile list of backups and schedule for depositions.	1.5	
4/12/2022	AX	Review case law.	0.3	
4/12/2022	AX	Draft Wallace declaration and related review of documents.	4.3	
4/12/2022	EH	Revising happy camper deposition tracker and circulating updates to team.	0.5	
4/12/2022	EH	Confer with team re depositions (AX, BBK, JSY, KES).	0.3	
4/12/2022	EH	Draft letter to potential deponent re withdrawal statement.	0.4	
4/12/2022	EH	Correspondence with BBK re scheduling depositions.	0.4	
4/12/2022	EH	Confer with AX re depositions of happy campers.	0.2	
4/12/2022	EH	Outreach to court reporting services re depo locations and timelines.	0.6	
4/12/2022	EH	Revise deposition tracking spreadsheet.	0.3	
4/12/2022	EH	Draft withdrawal statement re deposition.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2022	KES	TC Veritext re deponent depo logistics and email team re same.	0.7	
4/12/2022	KES	Review and follow up re status of service of depo subpoenas and notices and scheduling depos; draft new depo subpoenas and cover letters for replacement deponents; emails with team re same.	4.8	
4/13/2022	GCG	Review and revise Wallace reply declaration.	0.6	
4/13/2022	GCG	Conf w/ AG and email to GW re same.	0.2	
4/13/2022	GCG	Meet w/ JSY, AX, BBK, KES and EH re reply tasks and depositions of happy campers.	1.0	
4/13/2022	GCG	Review defendants' motions to seal opposition pleadings and remove incorrect documents.	0.3	
4/13/2022	GCG	Revise email to declarant counsel.	0.2	
4/13/2022	GCG	Conf w/ BBK re same.	0.1	
4/13/2022	GCG	Email to JSY and RS re depositions.	0.1	
4/13/2022	GCG	Emails to GM and MJ re experts depositions.	0.1	
4/13/2022	GCG	Research for plaintiffs' motion to seal.	0.1	
4/13/2022	GCG	Conf w/ KES re same.	0.1	
4/13/2022	JSY	Call with AX re organizing case tasks.	0.4	
4/13/2022	JSY	Emails re deposition coding assignments.	0.2	
4/13/2022	JSY	Team meeting; conf. w/ AX re deposition coverage.	0.9	
4/13/2022	JSY	Emails re deposition coverage.	0.2	
4/13/2022	JSY	Emails re communications re happy camper depositions.	0.1	
4/13/2022	JSY	Review arbitration pleadings re admissions re corporate control.	1.2	
4/13/2022	JSY	Emails re Defs' sealing motion.	0.1	
4/13/2022	BBK	Reviewing/approving updated tracking chart for happy camper depositions.	0.1	
4/13/2022	BBK	Attending to scheduling/serving subpoenas/staffing happy camper depositions (including comm'ns w/ court reporter services, process server companies, and RBGG team re same).	0.7	
4/13/2022	BBK	Conferring w/ AX re potential substitute happy camper declarants to depose.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2022	BBK	Conferring by phone w/ attorney for subpoenaed BD Monrovia happy camper declarant.	0.2	
4/13/2022	BBK	Drafting report/recommendation to team re FU after PC w/ attorney for subpoenaed BD Monrovia happy camper declarant.	0.2	
4/13/2022	BBK	Drafting/sending to team proposed plan for rescheduling deposition for BD Monrovia happy camper and draft email to opposing counsel re hosting deposition at BD Monrovia facility.	0.6	
4/13/2022	BBK	Drafting/sending e-mail to opposing counsel withdrawing deposition subpoena for happy camper declarant at BD Alhambra.	0.1	
4/13/2022	BBK	RBGG litigation team meeting re key tasks for Reply ISO Class Cert.	0.8	
4/13/2022	BBK	Drafting e-mail to attorney for subpoenaed BD Monrovia happy camper declarant regarding moving depo and holding it at BD Monrovia.	0.6	
4/13/2022	BBK	Conferring w/ GCG-JSY re revisions to e-mail to attorney for subpoenaed BD Monrovia happy camper declarant & sending same.	0.2	
4/13/2022	BBK	Conferring w/ JSY/AX re admissions by BD re control over CA facilities in motion to compel arbitration briefing.	0.1	
4/13/2022	BBK	Reviewing updated RBGG tasklist for Reply ISO Class Cert.	0.1	
4/13/2022	BBK	Reviewing Ds' 2d sealing motion.	0.1	
4/13/2022	AX	Meeting with team and then with JSY re case issues.	0.9	
4/13/2022	AX	Call with GCG re Guy Wallace declaration iso Reply and draft correspondence to team re same.	0.7	
4/13/2022	AX	Research RJN issue and draft email analysis to team.	1.5	
4/13/2022	AX	Review email correspondence w/ team re deposition scheduling issues.	0.5	
4/13/2022	AX	Draft email to team with back up selections for depositions.	0.5	
4/13/2022	AX	Call with Bernie Jestrabek-hart and draft summary to team.	0.5	
4/13/2022	AX	Review documents and draft Wallace declaration.	0.8	
4/13/2022	EH	Outreach to court reporting services re deposition locations and time.	1.5	
4/13/2022	EH	Revising deposition tracking spreadsheet.	0.5	
4/13/2022	EH	Organizing to file withdrawal statements and correspondence with deponents.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 591

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2022	EH	Drafting and finalizing NODs and subpoenas to resident declarants.	1.0	
4/13/2022	EH	Correspondence with BBK and KES re deposition scheduling.	0.3	
4/13/2022	EH	Correspondence with RLS re class member declaration for reply.	0.2	
4/13/2022	KES	Download and circulate pleadings.	0.6	
4/13/2022	KES	Revise and finalize new depo subpoenas for replacement deponents and arrange for service of same.	3.5	
4/13/2022	KES	Team meeting re depos, case tasks.	0.6	
4/13/2022	KES	Review status of depo coding, email team re same and begin coding Topic 11 depo.	1.0	
4/13/2022	KES	Follow up re status of service; emails with court reporter re depo locations, new depos and cancelled depos.	1.0	
4/14/2022	GCG	Confs w/ and emails to JSY re Wallace reply declaration, document review, deposition subpoenas and overall reply strategy.	0.5	
4/14/2022	GCG	Conf w/ and emails to BBK re deposition subpoenas to declarants and meet and confer w/ declarant attorney.	0.5	
4/14/2022	GCG	Conf w/ and emails to team and KES re deposition subpoenas.	0.2	
4/14/2022	GCG	Research and draft administrative motion to seal requested by court.	1.5	
4/14/2022	GCG	Conf w/ KES and emails to KES and JSY re same.	0.2	
4/14/2022	JSY	Conf. w/ AX re drafting GBW declaration and issues for standards for Reply.	0.5	
4/14/2022	JSY	Conf. w/ GCG re case tasks.	0.2	
4/14/2022	JSY	Emails re deposition scheduling issues.	0.3	
4/14/2022	JSY	Emails re RJN issue.	0.1	
4/14/2022	JSY	Research re admissions from arbitration pleadings; draft GBW decl. re same.	3.0	
4/14/2022	JSY	Edit sealing motion documents; emails re same.	0.4	
4/14/2022	JSY	Emails re Defs' edits to letter brief re plans of operation; review same.	0.2	
4/14/2022	BBK	Reviewing AX report/recommendation re whether to file RJN for BD's SEC filings.	0.1	
4/14/2022	BBK	Attending to scheduling/serving/noticing depositions for happy camper declarants.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/14/2022	BBK	Reviewing court order re Ds' request to remove public filings from docket and conferring w/ team re same.	0.1	
4/14/2022	BBK	Conferring w/ JSY/AX re corporate control evidence for Reply Wallace Decl.	0.1	
4/14/2022	BBK	Reviewing e-mail from attorney for BD Monrovia happy camper declarant and planning response to same.	0.3	
4/14/2022	BBK	Conferring by phone/email w/ GCG and JSY re response to atty for BD Monrovia happy camper declarant.	0.2	
4/14/2022	BBK	Attending to preparing amended deposition subpoena for BD Monrovia happy camper declarant.	0.1	
4/14/2022	BBK	Prep for phone call w/ attorney for BD Monrovia happy camper declarant re deposition.	0.2	
4/14/2022	BBK	Phone call w/ attorney for BD Monrovia happy camper declarant re deposition.	0.2	
4/14/2022	BBK	Drafting report/recommendation re FU post-PC w/ atty for BD Monrovia happy camper declarant.	0.2	
4/14/2022	BBK	Reviewing medical POA paperwork provided by POA for BD Irvine happy camper declarant.	0.1	
4/14/2022	BBK	Emailing w/ POA for BD Irvine happy camper declarant re sharing doctor's note of incapacity.	0.1	
4/14/2022	BBK	Reviewing conservatorship paperwork shared by attorney for BD Alhambra happy camper declarant.	0.1	
4/14/2022	BBK	Emailing w/ attorney for BD Alhambra happy camper declarant re conservator ship.	0.1	
4/14/2022	BBK	Reviewing comm'ns w/ litigation team re motion to consider whether Ds' additional material should be sealed.	0.1	
4/14/2022	BBK	Reviewing FU email from attorney for BD Monrovia happy camper declarant re deposition and planning/proposing next steps.	0.2	
4/14/2022	BBK	Conferring w/ team re Ds' revisions to discovery letter brief to compel BD's plans of operation.	0.1	
4/14/2022	AX	Call with JSY re case tasks.	0.5	
4/14/2022	AX	Review JSY components of Guy Wallace declaration.	0.5	
4/14/2022	AX	Email correspondence w/ Brian U. re case issues.	0.3	
4/14/2022	AX	Draft Guy Wallace declaration and related review of documents.	4.0	
4/14/2022	AX	Email correspondence w/ team re depositions.	0.4	
4/14/2022	EH	Correspondence with co-counsel re under seal declarations.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 593

SERVICES

Date	Person	Description of Services	Hours	Discount
4/14/2022	EH	Outreach to court reporting services re deposition locations and times.	0.9	
4/14/2022	EH	Analyzing resident declarations for potential deponents.	1.2	
4/14/2022	EH	Revise deposition tracking spreadsheet and correspondence with team re same.	0.7	
4/14/2022	EH	Correspondence with BBK and KES re scheduling depositions.	0.5	
4/14/2022	KES	Emails with process server re status of depo subpoenas and new subpoenas for service and prepare subpoenas; emails re amended subpoena.	0.5	
4/14/2022	KES	Follow up re download of voluminous pleadings.	0.2	
4/14/2022	KES	Review and redline draft admin motion.	0.3	
4/14/2022	KES	Draft, finalize and serve notices of depo for four served deponents.	2.5	
4/14/2022	KES	Emails with team and with court reporter re depo status.	0.5	
4/14/2022	KES	Research re possible new addresses.	2.0	
4/15/2022	GCG	Revise communication to GM re deposition issues.	0.2	
4/15/2022	GCG	Confs w/ BBK, JSY and KES and emails to team re selection of and preparation for depositions of declarants and overall reply strategy.	0.9	
4/15/2022	GCG	Email to GW and team re Anderson deposition.	0.2	
4/15/2022	JSY	Review depo transcript of B. Williams; emails re same.	0.4	
4/15/2022	JSY	Edit, finalize and file sealing motion.	1.0	
4/15/2022	JSY	Meeting with BBK, AX, and RS re depositions and scheduling.	1.0	
4/15/2022	JSY	Edit letter brief re plans of operation; emails with Defs' re same.	0.5	
4/15/2022	JSY	Emails and calls re communications with residents and family members re depositions.	0.7	
4/15/2022	JSY	Draft and edit GBW decl. ISO reply; messages re same.	2.5	
4/15/2022	BBK	Reviewing G. Wallace report re deposition of Ds' ADA expert D. Anderson.	0.1	
4/15/2022	BBK	Conferring w/ GCG re in-person happy camper depositions.	0.1	
4/15/2022	BBK	Reviewing report from G. Maatman regarding BD Irvine happy camper.	0.1	
4/15/2022	BBK	Attending to scheduling/staffing/serving/noticing happy camper depositions.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/15/2022	BBK	Emailing w/ RBGG team and RLS re outreach to subpoenaed happy camper declarants to confirm they are appearing for upcoming depositions.	0.1	
4/15/2022	BBK	Serving amended deposition subpoena on atty for BD Monrovia happy camper declarant.	0.1	
4/15/2022	BBK	Drafting email to opposing counsel re accommodation request for BD Monrovia happy camper declaration's deposition.	0.7	
4/15/2022	BBK	Revising/sending email to opposing counsel re accommodation request for BD Monrovia happy camper declaration's deposition per JSY and GCG comments on same.	0.3	
4/15/2022	BBK	Reviewing PI report on contacts w/ potential witnesses.	0.2	
4/15/2022	BBK	(Billing Judgment) Emailing w/ PI re stopping work.	0.0	0.1
4/15/2022	BBK	Reviewing comm'ns re finalizing/filing motion to consider whether Ds' additional material should be sealed.	0.1	
4/15/2022	BBK	Meeting w/ JSY/AX/RLS re happy camper depositions.	0.9	
4/15/2022	BBK	Reviewing M. Jacobsen email denying accommodations for BD Monrovia happy camper declarant and brainstorming proposed response.	0.2	
4/15/2022	BBK	Phone call w/ GCG re happy camper depositions and evidence for motion to strike declarations.	0.2	
4/15/2022	BBK	Reviewing/responding to JSY report re call w/ daughter of BD Redwood City happy camper declarant.	0.2	
4/15/2022	BBK	Listening to voice mail from BD Monrovia happy camper declarant and reporting to team re same.	0.2	
4/15/2022	BBK	Reviewing RLS report re call w/ POA for subpoenaed BD Irvine happy camper declarant and conferring w/ her obtaining withdrawal statement from same.	0.2	
4/15/2022	BBK	Drafting/sending notice to opposing counsel re taking depo of BD Irvine declarant off calendar.	0.1	
4/15/2022	BBK	Conferring w/ AX and JSY re evidence ISO motion to strike happy camper declarations.	0.2	
4/15/2022	BBK	Conferring w/ medical POA for BD Irvine resident regarding sending letter of incompetence from doctor; updating team re same.	0.1	
4/15/2022	BBK	Phone call w/ attorney for conservator of BD Alhambra happy camper declarant.	0.1	
4/15/2022	BBK	Drafting report/recommendation to team re PC w/ attorney for conservator of BD Alhambra happy camper declarant.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 595

SERVICES

Date	Person	Description of Services	Hours	Discount
4/15/2022	BBK	Drafting/sending declaration withdrawal statement to attorney for conservator of BD Alhambra happy camper declarant.	0.3	
4/15/2022	BBK	Conferring w/ JSY and AX re evidence of corporate control for Wallace Reply Decl.	0.1	
4/15/2022	BBK	Reviewing transcript of deposition of BD North Euclid happy camper declarant.	0.3	
4/15/2022	AX	Meeting with team re case tasks.	1.0	
4/15/2022	AX	Call with JSY re case tasks.	0.4	
4/15/2022	AX	Review documents, draft and revise Wallace declaration.	3.5	
4/15/2022	AX	Review JSY components of Wallace declaration.	0.5	
4/15/2022	EH	Outreach to court reporting services re deposition locations and times.	0.5	
4/15/2022	EH	Revising NOD and subpoenas (.6); correspondence with BBK re same (.4).	1.0	
4/15/2022	EH	Correspondence with team re scheduling depositions and finding replacement deponents.	0.5	
4/15/2022	KES	Finalize, efile and email PO re Admin Motion to Seal.	0.4	
4/15/2022	KES	Emails with team re defs docs filed under seal.	0.3	
4/15/2022	KES	Follow up with ACE re status of service and new subpoenas.	0.5	
4/15/2022	KES	Relativity research re certain deponents; draft, finalize and serve notices of depo.	4.0	
4/15/2022	KES	Emails with court reporter re depo status, locations and logistics.	1.0	
4/15/2022	KES	Update depo status chart.	0.2	
4/16/2022	GCG	Review BBK email re declarant voicemail and plan for response.	0.1	
4/16/2022	BBK	Reviewing VM from subpoenaed BD Irvine happy camper declarant and planning response to same.	0.2	
4/16/2022	BBK	Left VM for subpoenaed BD Irvine happy camper declarant.	0.1	
4/16/2022	BBK	Drafting update to team re call from subpoenaed BD Irvine happy camper declarant and necessary FU.	0.2	
4/16/2022	BBK	Reviewing AX memo re legal standards for Pls' claims as relevant for BD corporate control.	0.1	
4/17/2022	GCG	Texts and emails w/ JSY re upcoming depositions.	0.2	
4/17/2022	GCG	Legal research for reply.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2022	BBK	Conferring w/ RBGG team and RLS re happy camper depositions.	0.1	
4/18/2022	GCG	Revise communications to declarants and opposing counsel re upcoming depositions.	0.4	
4/18/2022	GCG	Conf w/ GW and MJ re potential withdrawal of deposition subpoena.	0.3	
4/18/2022	GCG	Meet w/ RBGG team re serving additional subpoenas and motion to strike.	0.5	
4/18/2022	GCG	Email to BU and team re competence of testimony related to POA.	0.2	
4/18/2022	GCG	Conf w/ JSY re same.	0.2	
4/18/2022	GCG	Emails to RS and team re deponent not showing.	0.1	
4/18/2022	GCG	Conf w/ declarant EO re deposition.	0.3	
4/18/2022	GCG	Email to team re same.	0.1	
4/18/2022	JSY	Calls with AX re deposition issues and edits to GBW declaration.	0.4	
4/18/2022	JSY	Team meeting re depositions.	0.5	
4/18/2022	JSY	Call with GCG re deposition issues.	0.2	
4/18/2022	JSY	Call with family member of deponent.	0.1	
4/18/2022	JSY	Call with BBK re deposition issues.	0.4	
4/18/2022	JSY	Finalize and file letter brief re Plans of Operation.	0.4	
4/18/2022	JSY	Multiple emails and messages re communications with deponents and family members.	0.8	
4/18/2022	JSY	Emails re discovery requests from Defs.	0.1	
4/18/2022	JSY	Draft section of GBW declaration; research re same.	1.2	
4/18/2022	BBK	Attending to identifying substitute happy camper declarants and scheduling/serving/noticing depos.	2.2	
4/18/2022	BBK	Reviewing letter from doctor of subpoenaed BD Irvine happy camper declarant regarding incapacity to sit for 4/21 depo; reporting to team re same.	0.1	
4/18/2022	BBK	Reviewing GCG report re call w/ subpoenaed BD Irvine happy camper declarant for 4/26 depo and comm'ns w/ team re taking her off calendar.	0.1	
4/18/2022	BBK	Comm'ns w/ team re follow-up w/ Ds to finalize joint discovery ltr brief re Jestrabek-Hart interrogatories.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2022	BBK	Reviewing AX report re call w/ subpoenaed BD San Ramon happy camper declarant and potential withdrawal statement; conferring w/ AX re same.	0.2	
4/18/2022	BBK	RBGG team meeting re happy camper depositions.	0.5	
4/18/2022	BBK	Conferring w/ team re sufficiency of evidence to discredit happy camper declaration.	0.2	
4/18/2022	BBK	Reviewing RLS report re "no show" happy camper declarant for 4/18 depo.	0.1	
4/18/2022	BBK	Reviewing AX report re call w/ daughter of subpoenaed BD Oceanside happy camper declarant.	0.1	
4/18/2022	BBK	Reviewing/responding to RLS report re call w/ POA for subpoenaed BD Uptown Whittier happy camper declarant; conferring w/ team re taking off calendar and notifying BD re same.	0.2	
4/18/2022	BBK	Reviewing voicemail from BD employee re represented subpoenaed BD Monrovia and conferring w/ JSY re addressing same.	0.4	
4/18/2022	BBK	Drafting recommendation and draft email to attorney of subpoenaed BD Monrovia resident who contacted our office re deposition.	0.3	
4/18/2022	BBK	Sending email to attorney of subpoenaed BD Monrovia resident who contacted our office re deposition.	0.1	
4/18/2022	BBK	Conferring w/ JSY re FU w/ children/POAs for subpoenaed BD Redwood City happy camper declarants.	0.1	
4/18/2022	BBK	Research re procedure and legal standards for excluding happy camper declarations.	1.0	
4/18/2022	BBK	Comm'ns w/ team re Ds' Second Set of RFPs.	0.1	
4/18/2022	BBK	Reviewing Ds' replies ISO Daubert Motions v. Pls Experts.	0.1	
4/18/2022	EH	Revising declarant tracking chart and analyzing same.	0.6	
4/18/2022	EH	Correspondence with KES re scheduling resident depositions.	0.3	
4/18/2022	EH	Correspondence with co-counsel re resident deponent tracking chart.	0.3	
4/18/2022	EH	Outreach to court reporting services re scheduling resident depositions.	1.5	
4/18/2022	KES	Download and circulate pleadings.	1.0	
4/18/2022	KES	Prepare new subpoenas for replacement deponents and arrange for service.	2.0	
4/18/2022	KES	Emails re status of service of deponents.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2022	KES	Draft and service NODs for new deponents.	2.0	
4/18/2022	KES	Emails with court reporter re status of depos and logistics.	0.5	
4/19/2022	GCG	Conf w/ and emails to BBK re responses to potential declarants and defendants' counsel.	0.3	
4/19/2022	GCG	Conf w/ declarant EO.	0.2	
4/19/2022	GCG	Email team re same.	0.1	
4/19/2022	GCG	Conf w/ KES re notices of deposition.	0.1	
4/19/2022	GCG	Meet w/ JSY, BBK, AX and RS re deposition strategy and withdrawal statements.	0.5	
4/19/2022	GCG	Emails to MJ, JSY and GM re letter briefs.	0.1	
4/19/2022	JSY	Team meeting re deposition issues.	1.0	
4/19/2022	JSY	Calls with family member of deponent.	0.3	
4/19/2022	JSY	Emails re Mastin and Waters reports.	0.2	
4/19/2022	JSY	Multiple emails and calls re deposition issues and withdrawals.	1.0	
4/19/2022	JSY	Emails re discovery requests.	0.1	
4/19/2022	BBK	Conferring w/ team re under seal filings for Daubert Reply briefing.	0.1	
4/19/2022	BBK	Attending to planning/scheduling/staffing/serving/noticing happy camper declarants.	1.1	
4/19/2022	BBK	Conferring w/ JSY and AX re happy camper depositions.	0.2	
4/19/2022	BBK	Emails re depositions.	0.5	
4/19/2022	BBK	Conferring w/ team re revisions to draft email to opposing counsel and attorney for BD Monrovia deponent re deposition.	0.2	
4/19/2022	BBK	Conferring by phone w/ AX re happy camper depositions.	0.3	
4/19/2022	BBK	Reviewing AX report re call w/ medical POA for subpoenaed BD Oceanside happy camper; conferring w/ team re same.	0.2	
4/19/2022	BBK	Analyzing POAs and reporting to team on authority of persons who signed withdrawal statements to do so.	0.7	
4/19/2022	BBK	Legal research re procedure for striking/excluding happy camper declarations.	0.6	
4/19/2022	BBK	Meeting w/ KES re happy camper depositions.	0.2	
4/19/2022	BBK	RBGG team meeting re happy camper depositions.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 599

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2022	BBK	Phone call w/ subpoenaed BD Irvine happy camper re 4/22 depo.	0.1	
4/19/2022	BBK	Drafting/sending report and recommendation re PC w/ subpoenaed BD Irvine happy camper re 4/22 depo.	0.1	
4/19/2022	BBK	Notifying defendants re withdrawal of deposition of BD Oceanside happy camper.	0.1	
4/19/2022	BBK	Reviewing Maatman email re happy camper depositions and conferring internally re same.	0.2	
4/19/2022	BBK	Phone call w/ subpoenaed BD Irvine resident re 4/29 depo.	0.3	
4/19/2022	BBK	Drafting declaration withdrawing statement for BD Irvine resident.	0.6	
4/19/2022	BBK	Conferring w/ JSY and revising declaration withdrawing statement for BD Irvine resident accordingly.	0.2	
4/19/2022	BBK	Conferring by phone w/ BD Irvine resident re declaration.	0.3	
4/19/2022	BBK	Drafting report re call w/ subpoenaed BD Irvine resident re 4/29 depo.	0.2	
4/19/2022	BBK	Preparing and sending via DocuSign declaration of BD Irvine resident withdrawing happy camper statement.	0.3	
4/19/2022	BBK	Conferring w/ JSY re FU w/ responsible party for BD Anaheim happy camper; reviewing JSY report re same.	0.2	
4/19/2022	BBK	Meeting w/ GCG re responding to opposing counsel misrepresentations and discrediting happy camper declarations.	0.2	
4/19/2022	AX	Team meeting with RBGG re deposition issues.	1.0	
4/19/2022	AX	Email correspondence w/ MM and DG declaration/deposition and related correspondence w/ team.	1.2	
4/19/2022	AX	Draft DG withdrawal statement.	0.3	
4/19/2022	AX	Draft Wallace declaration iso Reply and related document review.	1.0	
4/19/2022	EH	Organizing to file client docs related to resident depositions.	0.5	
4/19/2022	EH	Outreach to court reporting services re depo location and time.	0.9	
4/19/2022	EH	Revise resident deposition tracking spreadsheet and circulate to team.	0.6	
4/19/2022	KES	Download and circulate pleadings.	0.8	
4/19/2022	KES	Upload barrier lists.	0.2	
4/19/2022	KES	Update depo status chart.	2.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 600

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2022	KES	Emails with ACE re service of subpoenas.	0.3	
4/19/2022	KES	Draft, finalize and send last depo notices.	2.0	
4/19/2022	KES	Emails with court reporter re depo status and logistics.	0.2	
4/20/2022	GCG	Prepare for and conduct team meetings re reply pleadings and resident depositions.	1.0	
4/20/2022	GCG	Conf w/ and email to JSY re hearing on plans of operation.	0.1	
4/20/2022	GCG	Review communication to GM.	0.1	
4/20/2022	GCG	Conf w/ BBK re same.	0.1	
4/20/2022	GCG	Emails w/ RS re deposition.	0.1	
4/20/2022	JSY	Call with GCG re case tasks.	0.2	
4/20/2022	JSY	Multiple calls and emails re declarant depos.	0.5	
4/20/2022	JSY	Call with MTJ re discovery hearing prep.	0.3	
4/20/2022	JSY	Team meeting re case tasks (0.8); RBGG only meeting re case tasks (0.5).	1.3	
4/20/2022	JSY	Emails re document production from Brookdale.	0.1	
4/20/2022	JSY	Research re timeline for Plans of Operation brief; email MTJ re same.	0.3	
4/20/2022	BBK	Conferring w/ team re depo transcripts for happy camper depositions.	0.1	
4/20/2022	BBK	Reviewing signed declaration from BD Irvine resident withdrawing happy camper declaration and updating co-counsel re same.	0.2	
4/20/2022	BBK	Phone call w/ BD Paulin Creek resident re withdrawal statement.	0.2	
4/20/2022	BBK	Reporting to team re PC w/ BD Paulin Creek resident re withdrawal statement.	0.1	
4/20/2022	BBK	PC w/ medical POA for BD Irvine happy camper declarant taken off calendar while on hospice.	0.1	
4/20/2022	BBK	Drafting report/recommendation to team re PC w/ medical POA for BD Irvine happy camper declarant taken off calendar while on hospice.	0.2	
4/20/2022	BBK	PC w/ BD Folsom happy camper declarant regarding 4/29 deposition.	0.2	
4/20/2022	BBK	Drafting report/recommendation to team re PC w/ BD Folsom happy camper declarant regarding 4/29 deposition.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 601

SERVICES

Date	Person	Description of Services	Hours	Discount
4/20/2022	BBK	Conferring w/ KES and process server company re witness fee checks.	0.1	
4/20/2022	BBK	Attending to scheduling of happy camper depositions.	0.3	
4/20/2022	BBK	Reviewing comm'ns re finalizing/filing joint discovery letter brief re Jestrabek-Hart Interrogatories and MJ Beeler setting hearing re pending two joint letter briefs.	0.1	
4/20/2022	BBK	Conferring w/ JSY and AX re happy camper declarations and depositions.	0.2	
4/20/2022	BBK	Planning/preparing FU w/ responsible party for BD Nohl Ranch resident whom BD alleges cannot sit for deposition.	0.3	
4/20/2022	BBK	PC w/ BD Nohl Ranch resident whom BD alleges cannot sit for deposition.	0.5	
4/20/2022	BBK	PC w/ POA for BD Nohl Ranch resident whom BD alleges cannot sit for deposition.	0.2	
4/20/2022	BBK	Drafting report/recommendation to team post-PCs w/ PBD Nohl Ranch resident and his POA.	0.3	
4/20/2022	BBK	Meeting w/ co-counsel re Reply ISO Class Cert.	0.8	
4/20/2022	BBK	Meeting w/ RBGG team re Reply ISO Class Cert and happy camper depos.	0.8	
4/20/2022	BBK	Confirming that BD has been notified of all depositions taken off calendar.	0.2	
4/20/2022	BBK	Drafting proposed email response to Maatman to correct misrepresentations in 4/19 email.	0.6	
4/20/2022	BBK	Conferring w/ GCG re draft email response to Maatman; revising same per comments.	0.2	
4/20/2022	BBK	Conferring w/ RBGG team re plan for outreach to remaining happy camper declarants whose depos are still on calendar.	0.2	
4/20/2022	AX	Meeting with co counsel re Reply brief issues.	0.8	
4/20/2022	AX	Meeting with RBGG team re same.	0.8	
4/20/2022	AX	Email correspondence w/ team re depositions.	0.9	
4/20/2022	AX	Calls with CS.	0.5	
4/20/2022	AX	Review residency agreements, declarations for deponents and related correspondence w/ team.	1.5	
4/20/2022	KES	Follow up with ACE re status of subpoena service.	2.5	
4/20/2022	KES	Download pleading and calendar hearing.	0.1	
4/20/2022	KES	Confer team re depo schedule and update chart.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/20/2022	KES	Emails with court reporter re status of depos.	0.4	
4/21/2022	GCG	Conf w/ RS re deposition preparation.	0.3	
4/21/2022	GCG	Conf w/ JSY and emails to BBK and team re depositions of residents.	0.3	
4/21/2022	JSY	Attend to discovery hearing.	0.6	
4/21/2022	JSY	Emails re documents for GBW declaration.	0.1	
4/21/2022	JSY	Emails re depositions of declarants.	0.2	
4/21/2022	JSY	Prepare RFP responses.	0.1	
4/21/2022	JSY	Emails with declarants' family members.	0.2	
4/21/2022	BBK	Conferring w/ JSY and AX re 4/21 discovery hearing.	0.2	
4/21/2022	BBK	Reviewing signed withdrawal statement from POA for BD San Ramon happy camper declarant.	0.1	
4/21/2022	BBK	Reviewing VM from BD Paulin Creek happy camper declarant and updating team re same.	0.1	
4/21/2022	BBK	Phone call w/ BD Paulin Creek happy camper declarant and updating team re same.	0.2	
4/21/2022	BBK	Phone call w/ AX re outreach to happy camper declarants w/ depositions set for week of 4/25.	0.3	
4/21/2022	BBK	Reviewing minute order granting in part Pls' two motions to compel.	0.1	
4/21/2022	BBK	Attending to scheduling depositions & planning outreach to subpoenaed deponents (and conferring w/ team re same).	2.2	
4/21/2022	BBK	Phone call w/ responsible party for subpoenaed BD Redwood City happy camper declarant re deposition.	0.2	
4/21/2022	BBK	Emailing signed statement filed by BD and depo subpoena to responsible party for BD Redwood City happy camper declarant.	0.1	
4/21/2022	BBK	Phone call w/ BD Folsom resident re adjusting location and start time of 4/29 deposition to accommodate her disability.	0.2	
4/21/2022	BBK	Attending to preparation and service of amended depo subpoena for BD Folsom resident.	0.3	
4/21/2022	BBK	Attending to preparation and service of amended depo notice on Ds re BD Folsom happy camper declarant.	0.3	
4/21/2022	BBK	Drafting/sending email to opposing counsel notifying them of depositions coming off calendar for week of 4/25.	0.1	
4/21/2022	BBK	Updating team regarding status of remaining happy camper depositions.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/21/2022	AX	(Billing Judgment) Attend discovery hearing and related correspondence w/ team.	0.0	0.5
4/21/2022	AX	Call with MF.	0.3	
4/21/2022	AX	Related correspondence to team re next steps.	0.3	
4/21/2022	AX	Call with SH and related correspondence with team re next steps.	1.0	
4/21/2022	AX	Email correspondence w/ team re logistics for contacting declarants.	0.5	
4/21/2022	AX	Call with CS re BM, PN depositions.	0.2	
4/21/2022	AX	Email correspondence w/ team and with CS re same.	0.6	
4/21/2022	KES	Update depo status chart.	1.0	
4/21/2022	KES	Download Anderson depo transcript and upload to TextMap and DMS.	0.3	
4/21/2022	KES	Calendar production deadline per court order.	0.1	
4/21/2022	KES	Emails with team and court reporter re status of depos and logistics.	1.0	
4/21/2022	KES	Prepare amended subpoena and NOD re new location.	1.2	
4/22/2022	GCG	Emails to RS and team re deposition of CM.	0.1	
4/22/2022	GCG	Conf w/ JSY re same.	0.1	
4/22/2022	GCG	Email to AX and defendants re additional depositions.	0.1	
4/22/2022	JSY	Call with RS re deposition.	0.1	
4/22/2022	JSY	Emails and calls re communications with declarants.	0.4	
4/22/2022	JSY	Emails re deposition of happy camper declarant.	0.1	
4/22/2022	JSY	Draft RFP responses.	0.5	
4/22/2022	JSY	Messages with AX re GBW declaration.	0.2	
4/22/2022	BBK	Reviewing updates from RLS re 4/22 happy camper deposition; conferring w/ team re same.	0.2	
4/22/2022	BBK	Conferring w/ JSY/AX re obtaining withdrawal statement from daughter/POA of BD Anaheim happy camper declarant.	0.1	
4/22/2022	BBK	Reviewing E. Rutner email re 4/29 depositions and conferring w/ team re same.	0.1	
4/22/2022	BBK	Conferring w/ AX re outreach to family member of subpoenaed BD Anaheim happy camper declarant.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/22/2022	BBK	Conferring w/ AX re outreach to POA of subpoenaed BD Garden Grove happy camper declarant.	0.1	
4/22/2022	BBK	Reviewing AX draft Wallace Reply Decl.	0.4	
4/22/2022	BBK	Drafting section of Wallace Reply Decl re Family & Resident Connections.	0.5	
4/22/2022	BBK	Attending to scheduling and notifying Ds re changes to upcoming happy camper depositions (including conferring w/ team re same).	0.8	
4/22/2022	BBK	Attempts to reach POA for subpoenaed BD Garden Grove happy camper declarant re 4/29 depo.	0.2	
4/22/2022	BBK	Attempts to reach subpoenaed BD North Euclid happy camper declarant re 4/29 depo.	0.3	
4/22/2022	BBK	Phone call w/ sister/medical POA for subpoenaed BD North Euclid happy camper declarant.	0.3	
4/22/2022	BBK	Emailing signed statement filed by BD and depo subpoena to daughter/medical POA for subpoenaed BD North Euclid happy camper declarant.	0.1	
4/22/2022	BBK	Drafting report/recommendation to team re call w/ daughter/medical POA for subpoenaed BD North Euclid happy camper declarant.	0.2	
4/22/2022	BBK	Meeting w/ AX re upcoming happy camper depositions.	0.2	
4/22/2022	BBK	Conferring w/ AX and JSY re withdrawal statements from happy camper declarants.	0.1	
4/22/2022	BBK	Reviewing comm'ns w/ co-counsel re Ds' expert deposition transcripts.	0.1	
4/22/2022	AX	Email correspondence w/ team re withdrawal statements.	0.2	
4/22/2022	AX	Email correspondence w/ team re withdrawal statements for various class members.	1.0	
4/22/2022	AX	Call with DK.	0.2	
4/22/2022	AX	Related email correspondence w/ team and DK re deposition.	0.5	
4/22/2022	AX	Phone call with IJ family member.	0.2	
4/22/2022	AX	Related correspondence w/ team re same.	0.2	
4/22/2022	AX	Draft email correspondence to class members and family re depositions.	0.4	
4/22/2022	AX	Draft letter and attachments to MF.	0.8	
4/22/2022	AX	Draft Wallace declaration iso Reply.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/22/2022	EH	Organizing to file client docs related to resident depositions.	0.3	
4/22/2022	EH	Analyzing DSS citations for BBK decl.	0.9	
4/22/2022	EH	Correspondence with court reporting services re depo locations and logistics.	0.4	
4/22/2022	EH	Revising resident deposition tracking chart and circulating same to team.	0.6	
4/22/2022	KES	Download and circulate expert depo transcripts; upload to TextMap.	0.4	
4/22/2022	KES	Download and circulate pleadings.	1.0	
4/22/2022	KES	Emails with team re depo subpoenas and notices; research re deponent contacts.	1.2	
4/24/2022	EH	Revise declarant deposition tracker.	0.2	
4/25/2022	GCG	Prepare for and conduct team meeting re reply pleadings and resident depositions.	0.9	
4/25/2022	GCG	Conf w/ and emails to JSY re possible witness for reply.	0.2	
4/25/2022	GCG	Conf w/ and emails to BBK re communications w/ declarants and family members and opposing counsel re deposition.	0.3	
4/25/2022	GCG	Revise documents for use in Wallace reply declaration re corporate control.	1.1	
4/25/2022	GCG	Email to GM and MJ re Mastin deposition.	0.1	
4/25/2022	GCG	Email to AX, GW and team re requests for accommodation.	0.2	
4/25/2022	JSY	Conf. w/ GCG re case tasks.	0.1	
4/25/2022	JSY	Call with BBK re deposition issues.	0.2	
4/25/2022	JSY	Call with AX re GBW declaration and depositions.	0.3	
4/25/2022	JSY	Team meeting re case tasks.	0.9	
4/25/2022	JSY	Emails re declarant depositions and related issues.	0.4	
4/25/2022	JSY	Emails with team re potential declarant.	0.3	
4/25/2022	JSY	Emails re deposition schedule.	0.1	
4/25/2022	JSY	Emails re calls with potential witnesses.	0.1	
4/25/2022	JSY	Edit GBW declaration re disciplinary issues; research re same.	1.5	
4/25/2022	BBK	Attending to planning/staffing/noticing depositions of happy camper declarants.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2022	BBK	Addressing issue raised by opposing counsel regarding notice for 4/28 deposition of BD Redwood City happy camper declarant.	0.8	
4/25/2022	BBK	Conferring w/ GCG re happy camper depositions.	0.2	
4/25/2022	BBK	Conferring w/ RBGG team re AX report/recommendation regarding comm'ns w/ POA of subpoenaed BD Garden Grove resident set for 4/27.	0.1	
4/25/2022	BBK	Reviewing JSY report re complaint to BD's CEO by putative class member's family.	0.1	
4/25/2022	BBK	Preparing for RBGG team meeting.	0.2	
4/25/2022	BBK	Emailing w/ AX re section of Wallace Reply Declaration on Family & Resident Connections Hotline.	0.1	
4/25/2022	BBK	Meeting w/ RBGG team on Reply Brief tasks.	0.9	
4/25/2022	BBK	Reviewing JSY-RLS comm'ns re taking 4/29 deposition of BD Folsom resident.	0.1	
4/25/2022	BBK	Reviewing two withdrawal statements rec'd today from resident and POA of resident.	0.1	
4/25/2022	BBK	Drafting/sending email notifying opposing counsel re two happy camper depositions coming off calendar.	0.1	
4/25/2022	BBK	Reviewing/responding to AX report re call from niece of BD Anaheim happy camper declarant.	0.2	
4/25/2022	BBK	Reviewing rough transcript of RLS's 4/22 deposition of BD Irvine resident.	0.2	
4/25/2022	BBK	Phone call w/ daughter of subpoenaed BD Garden Grove resident re 4/29 deposition.	0.3	
4/25/2022	BBK	Emailing daughter of subpoenaed BD Garden Grove resident depo subpoena and signed statement filed by BD; reporting to team re same.	0.2	
4/25/2022	BBK	Phone call w/ sister/medical POA of subpoenaed BD North Euclid resident re 4/29 deposition.	0.1	
4/25/2022	BBK	Phone call w/ subpoenaed BD North Euclid resident re 4/29 deposition.	0.4	
4/25/2022	BBK	Drafting report/recommendation to team re phone call w/ subpoenaed BD North Euclid resident re 4/29 deposition.	0.3	
4/25/2022	BBK	Drafting cover letter to mail signed statement filed by BD to subpoenaed BD North Euclid resident; conferring w/ KES re sending same.	0.3	
4/25/2022	BBK	Phone call w/ case manager/responsible party for subpoenaed BD Redwood City declarant.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2022	BBK	Conferring w/ JSY and AX re phone call w/ case manager/responsible party for subpoenaed BD Redwood City declarant.	0.2	
4/25/2022	BBK	Drafting withdrawal statement and cover letter to send to subpoenaed BD Redwood City declarant and to her case manager/responsible party.	0.5	
4/25/2022	BBK	Drafting/sending update to team regarding call w/ case manager/responsible party for subpoenaed BD Redwood City resident; conferring w/ KES re FedExing letter/withdrawal statement.	0.2	
4/25/2022	BBK	Emailing letter/withdrawal statement to case manager/responsible party for subpoenaed BD Redwood City resident.	0.1	
4/25/2022	EH	Confer with KES re depositions subpoenas to resident declarants.	0.4	
4/25/2022	EH	Revise resident deposition tracking spreadsheet.	0.7	
4/25/2022	EH	Revise deposition subpoena for resident declarant.	0.3	
4/25/2022	EH	Draft and finalize proof of service for resident declarant subpoenas.	0.4	
4/25/2022	EH	Correspondence with BBK re deposition subpoenas.	0.4	
4/25/2022	KES	Emails with court report re depo status and logistics and email team re same.	0.5	
4/25/2022	KES	Team checkin.	0.5	
4/25/2022	KES	Download and circulate pleading.	0.1	
4/25/2022	KES	Follow up re depo transcripts.	0.1	
4/25/2022	KES	Research re potential witness.	0.3	
4/25/2022	KES	Emails with ACE re proofs of service.	0.5	
4/25/2022	KES	Arrange for correspondence in connection with withdrawals; update master tracking chart re same.	3.0	
4/26/2022	GCG	Research and draft sections of Wallace Reply declaration.	0.3	
4/26/2022	GCG	Emails to BBK and team re resident depositions.	0.3	
4/26/2022	GCG	Conf w/ JSY re revisions to Mastin and Waters reply declarations.	0.2	
4/26/2022	JSY	VM for potential witness; texts with same.	0.1	
4/26/2022	JSY	Conf. w/ MTJ re case projects.	0.3	
4/26/2022	JSY	Call with GCG re barrier list projects and other case tasks.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2022	JSY	Edit barrier lists; multiple emails and calls re same.	0.4	
4/26/2022	JSY	Emails re RFP responses; edit same.	0.2	
4/26/2022	JSY	Emails re deposition schedule.	0.2	
4/26/2022	JSY	Emails re project re benchmarks.	0.2	
4/26/2022	JSY	Edit GBW declaration re disciplinary documents; review and research same.	3.1	
4/26/2022	JSY	Emails re barrier lists.	0.1	
4/26/2022	BBK	Reviewing/drafting proposed response to email from daughter of subpoenaed BD Garden Grove resident.	0.5	
4/26/2022	BBK	Reviewing FU email from daughter of subpoenaed BD Garden Grove resident; conferring w/ team re response to same.	0.2	
4/26/2022	BBK	Failed attempts to reach daughter of subpoenaed BD Garden Grove resident by phone.	0.1	
4/26/2022	BBK	Phone call w/ daughter of subpoenaed BD Garden Grove resident re 4/29 deposition.	0.3	
4/26/2022	BBK	Conferring w/ team re phone call w/ daughter of subpoenaed BD Garden Grove resident.	0.2	
4/26/2022	BBK	Drafting withdrawal statement for subpoenaed BD Garden Grove resident and reporting to team re same.	0.4	
4/26/2022	BBK	Drafting email to daughter of subpoenaed BD Garden Grove resident re withdrawal statement.	0.2	
4/26/2022	BBK	Drafting cover letter to subpoenaed BD Garden Grove resident re withdrawal statement and reporting to team re same.	0.4	
4/26/2022	BBK	Conferring w/ AX and JSY re VM from opposing counsel re resident depositions.	0.1	
4/26/2022	BBK	Drafting proposed email response to opposing counsel re resident depositions.	0.5	
4/26/2022	BBK	Conferring w/ team re proposed email response to opposing counsel re resident depositions.	0.1	
4/26/2022	BBK	Phone call w/ daughter of subpoenaed BD Garden Grove resident re withdrawal statement.	0.1	
4/26/2022	BBK	Drafting report/recommendation to team re phone call w/ daughter of subpoenaed BD Garden Grove resident re withdrawal statement.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2022	BBK	Reviewing/responding to email from daughter of BD Garden Grove resident approving withdrawal statement; reporting to team re same.	0.3	
4/26/2022	BBK	Conferring w/ RLS re declaration from daughter of former BD Windsor resident.	0.1	
4/26/2022	BBK	Conferring w/ RLS re BBK comm'ns w/ subpoenaed BD Folsom declarant in prep for 4/29 deposition.	0.3	
4/26/2022	BBK	Conferring w/ JSY re outreach to potential witness.	0.1	
4/26/2022	BBK	Reviewing comm'ns w/ co-counsel regarding JSY draft objections to Ds' 2d Set of RFPs.	0.1	
4/26/2022	BBK	Analyzing new DSS citations v BD facilities and reviewing/revising updated chart of same.	2.0	
4/26/2022	BBK	Conferring w/ EH re next steps for DSS complaint analysis for BBK Reply Decl ISO class cert.	0.1	
4/26/2022	BBK	Attending to planning/scheduling/staffing happy camper depositions; conferring w/ team re same.	0.7	
4/26/2022	AX	Call with MB re Brookdale Cal DOJ case.	0.5	
4/26/2022	AX	(Billing Judgment) Review pleadings in prep for call.	0.0	0.4
4/26/2022	AX	(Billing Judgment) Call with KES and emails w/ co counsel re Sharepoint site access.	0.0	0.2
4/26/2022	AX	Review documents and draft Wallace declaration.	3.5	
4/26/2022	AX	Correspondence w/ team re class member/declaration depositions.	0.5	
4/26/2022	EH	Analyze and revise chart of DSS citations against assisted living facilities.	2.8	
4/26/2022	EH	Revise declarant deposition tracking spreadsheet.	0.4	
4/26/2022	KES	Comms. with court reporter and team re updated depo status and update chart re same.	2.3	
4/26/2022	KES	Confer JY re ED/HWD declarants and respective facilities for reply project; review discovery response re same.	0.8	
4/27/2022	GCG	Conf w/ CW and email to CN and MB re plaintiff outreach.	0.2	
4/27/2022	GCG	Conf w/ BBK re deposition strategy and call w/ ER.	0.2	
4/27/2022	GCG	Review letter from ER re cancellation of depositions.	0.2	
4/27/2022	GCG	Confs w/ and emails to BBK, JSY, AX and KES re response to same.	0.4	
4/27/2022	GCG	Review LB book and email team re inclusion of book and other documents in reply.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2022	GCG	Emails to BBK and JSY re reply declaration documents and depo changes.	0.2	
4/27/2022	JSY	Conf. w/ KES re spreadsheet of dates of ED tenure.	0.2	
4/27/2022	JSY	Calls and emails re barrier lists.	0.2	
4/27/2022	JSY	Emails re deponent transcripts.	0.2	
4/27/2022	JSY	Review letter from opposing counsel re depositions.	0.2	
4/27/2022	JSY	Draft cover letter to B. Williams re transcript.	0.2	
4/27/2022	JSY	Emails re depo transcripts.	0.1	
4/27/2022	JSY	Draft GBW declaration sections re discipline and SEC filings; review documents re same.	3.8	
4/27/2022	JSY	Emails re document with ED tenure.	0.1	
4/27/2022	JSY	Team meeting re response to same.	0.4	
4/27/2022	BBK	Emailing opposing counsel re taking deposition of BD Garden Grove resident off calendar.	0.1	
4/27/2022	BBK	Conferring w/ co-counsel re withdrawal statement for happy camper declarants.	0.1	
4/27/2022	BBK	Attending to planning/staffing/scheduling depositions of happy camper declarants.	1.2	
4/27/2022	BBK	Conferring w/ team re E. Rutner request to talk regarding happy camper depositions.	0.1	
4/27/2022	BBK	Phone call w/ E. Rutner regarding happy camper depositions; updating GCG/AX/JSY re same.	0.2	
4/27/2022	BBK	Drafting report to co-counsel re phone call w/ E. Rutner regarding happy camper depositions.	0.2	
4/27/2022	BBK	Phone call w/ subpoenaed BD North Euclid happy camper regarding 4/29 deposition.	0.2	
4/27/2022	BBK	Conferring w/ JSY/GG re request from subpoenaed BD North Euclid happy camper to take 4/29 depo off-calendar due to disability/health reasons.	0.3	
4/27/2022	BBK	Follow-up call w/ subpoenaed BD North Euclid happy camper.	0.1	
4/27/2022	BBK	Updating team regarding subpoenaed BD North Euclid happy camper's changed position re deposition.	0.1	
4/27/2022	BBK	Conferring w/ team re expert facility report updates for Reply ISO class cert.	0.1	
4/27/2022	BBK	Reviewing M. Johnson legal memo regarding admissibility of evidence submitted for class cert; conferring w/ team re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 611

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2022	BBK	Conferring w/ KES re FedExing withdrawal statement to BD Garden Grove resident.	0.1	
4/27/2022	BBK	Meeting w/ KES re projects for reply ISO class cert.	0.3	
4/27/2022	BBK	Phone call w/ EH re DSS citation analysis and BBK Reply Decl.	0.3	
4/27/2022	BBK	Drafting/sending email to J. Thornton regarding DSS citations for C. Flores reply decl.	0.3	
4/27/2022	BBK	Conferring w/ EH and J. Thornton regarding DSS citations for C. Flores reply decl.	0.2	
4/27/2022	BBK	Revising updated chart of DSS citations for BBK reply decl.	0.4	
4/27/2022	BBK	Drafting/sending update to RBGG team re analysis of DSS citations and proposal re BBK Reply Decl.	0.2	
4/27/2022	BBK	Reviewing E. Rutner letter re Plaintiffs' depositions of happy campers.	0.1	
4/27/2022	BBK	Conferring w/ RBGG team re addressing E. Rutner letter re Plaintiffs' depositions of happy campers.	0.2	
4/27/2022	BBK	Reviewing RLS emails refuting allegations in E. Rutner letter re Plaintiffs' depositions of happy campers.	0.1	
4/27/2022	BBK	Meeting w/ JSY/AX/GCG re addressing E. Rutner letter re Plaintiffs' depositions of happy campers and remaining depositions.	0.3	
4/27/2022	BBK	Preparing bullet points for response to E. Rutner letter re Plaintiffs' depositions of happy campers and remaining depositions.	0.3	
4/27/2022	BBK	Preparing for 4/29 deposition of BD North Euclid happy camper.	0.3	
4/27/2022	BBK	Conferring w/ team re ensuring BD resident deponents' opportunity to review/sign depo transcripts.	0.2	
4/27/2022	AX	Call with team re case strategy.	0.4	
4/27/2022	AX	Call with JSY re case tasks.	0.3	
4/27/2022	AX	Call with BBK re case tasks.	0.2	
4/27/2022	AX	Draft Wallace declaration.	0.5	
4/27/2022	EH	Confer with BBK re DSS citations project.	0.4	
4/27/2022	EH	Revising deposition tracking spreadsheet.	0.4	
4/27/2022	EH	Analyzing DSS citations for BBK reply declaration.	0.3	
4/27/2022	KES	Create chart re ED/HWD deponents and years at respective facilities for use in connection with task time runs for reply.	4.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/27/2022	KES	Review ACE POSes and follow up re declarations re non-service.	0.7	
4/28/2022	GCG	Continuing reviewing book for reply.	0.4	
4/28/2022	GCG	Conf w/ BBK re deposition preparation.	0.3	
4/28/2022	GCG	Meet w/ team re reply pleadings.	1.1	
4/28/2022	GCG	Meet w/ BBK and RS re depositions.	0.2	
4/28/2022	GCG	Conf w/ JSY and email to team re ongoing research for reply pleadings.	0.2	
4/28/2022	GCG	Review GW outline of brief.	0.2	
4/28/2022	GCG	Meet w/ CW, MB and CN re plaintiff outreach and Brookdale representatives.	0.2	
4/28/2022	GCG	Email putative class member re status.	0.1	
4/28/2022	JSY	Team meeting re case tasks.	1.5	
4/28/2022	JSY	Call with AX re RJN issue, SEC documents, and other case issues.	0.6	
4/28/2022	JSY	Call with GCG re RJN issue.	0.2	
4/28/2022	JSY	Send deposition transcripts to witnesses; draft cover letter for same; emails re same.	0.4	
4/28/2022	JSY	Update facility barrier lists; emails re same.	0.5	
4/28/2022	JSY	Research re changes in testimony.	0.1	
4/28/2022	JSY	Draft GBW declaration re SEC documents; review documents re same.	2.3	
4/28/2022	JSY	Emails re analysis of ED tenure.	0.1	
4/28/2022	BBK	Drafting outline and preparing for deposition of BD North Euclid resident.	3.7	
4/28/2022	BBK	Meeting w/ GCG re deposition of BD North Euclid resident.	0.4	
4/28/2022	BBK	Emails re: 4/29 depositions.	0.2	
4/28/2022	BBK	Phone call w/ BD Paulin Creek resident re withdrawal statement.	0.1	
4/28/2022	BBK	Conferring w/ team re sending depo transcripts to happy camper deponents for review/corrections.	0.1	
4/28/2022	BBK	Conferring w/ RBGG team re access barrier expert reports.	0.1	
4/28/2022	BBK	Reviewing transcript of 4/22 deposition to provide RLS guidance for 4/29 deposition.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/28/2022	BBK	Meeting w co-counsel re Reply ISO class cert.	1.4	
4/28/2022	BBK	Meeting w/ GCG and RLS re 4/29 depositions of BD residents.	0.3	
4/28/2022	BBK	reviewing comm'ns w/ team re filing RJN w/ Reply Brief re BD's 10Ks.	0.1	
4/28/2022	BBK	(Reduced Charge) Travel from San Francisco to Ontario for deposition of BD North Euclid resident.	1.9	2.0
4/28/2022	BBK	Preparing for deposition of BD North Euclid resident.	0.5	
4/28/2022	AX	Call with JSY re case tasks.	0.6	
4/28/2022	AX	Team meeting with co counsel re Reply brief and related issues.	1.5	
4/28/2022	AX	Email correspondence with team re questions re RJN.	0.6	
4/28/2022	AX	Legal research re Reply brief re owner/operator status.	0.3	
4/28/2022	AX	Draft Wallace declaration and review related documents.	0.8	
4/28/2022	KES	Complete coding of Topic 11 PMK transcript.	1.8	
4/28/2022	KES	Zoom meeting with co-counsel re class cert reply.	1.3	
4/28/2022	KES	Online research for reply.	0.4	
4/28/2022	KES	Mail copy of transcript to deponent.	0.4	
4/28/2022	KES	Emails with team re various reply tasks.	0.2	
4/28/2022	KES	Email R. Steyer with docs for depo.	0.1	
4/29/2022	GCG	Review documents for inclusion in Wallace declaration.	0.3	
4/29/2022	GCG	Review reports from happy camper depositions.	0.2	
4/29/2022	GCG	Conf w/ JSY and AX re Wallace reply declaration and Daubert motions.	0.2	
4/29/2022	GCG	Emails to c-counsel re same.	0.1	
4/29/2022	GCG	Email to MJ and defendants re missing documents.	0.1	
4/29/2022	JSY	Emails re hearing transcripts.	0.2	
4/29/2022	JSY	Edit barrier lists; emails re same.	0.2	
4/29/2022	JSY	Call with AX and GCG re GBW declaration and case tasks.	0.3	
4/29/2022	JSY	Emails re responses to Defs' footnotes re named plaintiff testimony.	0.1	
4/29/2022	JSY	Update case task list and filing checklist for reply.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/29/2022	JSY	Emails re Daubert motion.	0.1	
4/29/2022	JSY	Draft GBW declaration re SEC declaration; emails re same.	0.7	
4/29/2022	JSY	Review deposition transcripts from happy camper deposition.	0.3	
4/29/2022	BBK	Reviewing M. Johnson FU w/ Ds re production of BD plans of operation and bank account info as ordered by court.	0.1	
4/29/2022	BBK	(Reduced Charge) Travel from hotel to deposition location.	0.2	0.1
4/29/2022	BBK	Preparing for and set-up for deposition of BD North Euclid resident at location.	0.7	
4/29/2022	BBK	Conferring w/ witness, BD counsel, and court reporter prior to start of deposition.	0.2	
4/29/2022	BBK	Deposition of BD North Euclid resident.	2.1	
4/29/2022	BBK	Post-deposition comm'ns w/ witness, court reporter and BD counsel.	0.3	
4/29/2022	BBK	Drafting/sending summary of deposition of BD North Euclid resident to team.	0.3	
4/29/2022	BBK	Reviewing RLS's summary of deposition of BD Folsom resident.	0.1	
4/29/2022	BBK	(Reduced Charge) Travel home from deposition.	2.1	2.1
4/29/2022	FGL	Comms. revisions to barrier reports.	0.3	
4/29/2022	KES	TCs with R. Steyer and court reporter re depo logistics issue.	0.7	
4/29/2022	KES	Prepare and efile transcript order form.	0.3	
4/29/2022	KES	Emails with M. Johnson re barrier list Sharefile.	0.2	
4/30/2022	GCG	Review document for inclusion in Wallace reply declaration.	0.6	
5/1/2022	GCG	Review documents for Wallace declaration.	0.2	
5/1/2022	GCG	Review payment documents.	0.1	
5/1/2022	GCG	Emails to JSY and KES re authenticating same for reply pleadings.	0.2	
5/1/2022	BBK	Reviewing comm'ns w/ co-counsel/RBGG team re tasks for Reply ISO class cert.	0.1	
5/2/2022	GCG	Conf w/ and emails to BBK re happy camper depositions and reply declaration.	0.2	
5/2/2022	GCG	Conf w/ and emails to JSY re same and re Wallace declaration.	0.2	
5/2/2022	GCG	Interview potential witness.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 615

SERVICES

Date	Person	Description of Services	Hours	Discount
5/2/2022	GCG	Summarize notes for team.	0.3	
5/2/2022	GCG	Review documents for Wallace reply declaration.	1.0	
5/2/2022	GCG	Draft section of same.	0.5	
5/2/2022	GCG	Emails to MJ and team re GM email re missing document.	0.1	
5/2/2022	GCG	Review KES and AX analysis of client documents for reply pleadings.	0.5	
5/2/2022	GCG	Emails to JSY and team re documents to file May 19.	0.2	
5/2/2022	GCG	Review and revise letter from BBK to ER re resident depositions.	0.3	
5/2/2022	JSY	Call with GCG re current case tasks.	0.3	
5/2/2022	JSY	Emails and messages re invoices.	0.3	
5/2/2022	JSY	Emails re invoices.	0.1	
5/2/2022	JSY	Edit RFP responses; emails re same.	0.2	
5/2/2022	JSY	Emails re RJN.	0.2	
5/2/2022	JSY	Emails re updating barrier lists.	0.3	
5/2/2022	JSY	Research re copyright issues; email team re same.	1.5	
5/2/2022	JSY	Update filing checklist; emails with team re same.	0.2	
5/2/2022	JSY	Review BBK letter responding to ER letter re depos.	0.1	
5/2/2022	BBK	Attending to payment of invoice for video of 4/22 happy camper deposition; conferring w/ KES re same.	0.1	
5/2/2022	BBK	Conferring w/ team re evidence to establish that BD residents pay BD corporate.	0.2	
5/2/2022	BBK	Conferring w/ KES re FU w/ ACE Legal re invoice for service of deposition subpoenas.	0.1	
5/2/2022	BBK	Reviewing GW outline for reply ISO class cert.	0.2	
5/2/2022	BBK	Meeting w/ GCG re status of projects for Reply ISO class cert.	0.1	
5/2/2022	BBK	Reviewing comm'ns w/ co-counsel re Daubert motion to exclude certain opinions of Ds' experts.	0.1	
5/2/2022	BBK	Conferring w/ EH re compiling data re timing of Ps' cancellation of noticed depos.	0.2	
5/2/2022	BBK	Planning/drafting/revising response to E. Rutner letter on happy camper depositions.	4.9	
5/2/2022	BBK	Reviewing receipt of withdrawal statement from BD Garden Grove resident.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 616

SERVICES

Date	Person	Description of Services	Hours	Discount
5/2/2022	BBK	Reviewing/responding to GCG query re evidentiary objections to BD's opposition evidence.	0.2	
5/2/2022	BBK	Reviewing GCG report re call w/ potential witness.	0.1	
5/2/2022	BBK	Reviewing/incorporating GCG revisions to response to E. Rutner Letter; proof-reading same.	0.4	
5/2/2022	EH	Revising resident declarant depo tracker.	1.0	
5/2/2022	KES	Review subpoena service invoices and communications with ACE re reimbursement for uncashed witness fees.	1.0	
5/2/2022	KES	Review, analyze and gather documents for class cert reply topics and for potential use as exhibits.	6.0	
5/3/2022	GCG	Emails to GW and team re revisions to letter to ER.	0.2	
5/3/2022	GCG	Prepare for and conduct meeting w/ SW and BU re reply pleadings and Daubert motion.	1.3	
5/3/2022	GCG	Follow up meeting w/ RBGG team re same.	0.3	
5/3/2022	GCG	Conf w/ and emails to EH and team re reply pleadings and Daubert motions.	0.3	
5/3/2022	GCG	Review documents for reply.	0.5	
5/3/2022	JSY	Conf. w/ AX re RJN and GBW declaration.	0.1	
5/3/2022	JSY	Attend team meeting re case tasks.	1.8	
5/3/2022	JSY	Emails re barrier list updates.	0.3	
5/3/2022	JSY	Emails re filing checklist.	0.2	
5/3/2022	JSY	Draft responses to footnotes in opposition brief; emails re same.	1.2	
5/3/2022	JSY	Emails re RJN; research re same.	0.5	
5/3/2022	BBK	Reviewing JSY updates to RBGG case task list and filing checklist for class cert reply; conferring w/ team re same.	0.1	
5/3/2022	BBK	Reviewing/incorporating M. Johnson and G. Wallace comments on letter to E. Rutner re resident depositions; finalizing same.	0.4	
5/3/2022	BBK	Conferring w/ co-counsel and JSY/AX re letter to E. Rutner re resident depositions.	0.2	
5/3/2022	BBK	Conferring w/ EH re finalizing/sending response to E. Rutner re resident depositions; reviewing/approving same.	0.2	
5/3/2022	BBK	Reviewing AX draft Reply Wallace Declaration.	0.5	
5/3/2022	BBK	Preparing/drafting BBK Reply Decl.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 617

SERVICES

Date	Person	Description of Services	Hours	Discount
5/3/2022	BBK	Meeting w/ co-counsel re Reply ISO Class Cert.	1.4	
5/3/2022	BBK	RBGG team meeting re Reply ISO Class Cert.	0.3	
5/3/2022	EH	Finalize letter to OC re resident depos.	0.6	
5/3/2022	EH	Confer with team re outstanding tasks for class cert reply.	1.2	
5/3/2022	EH	Confer with AX and KES re exhibits to Wallace decl ISO class cert reply.	0.3	
5/3/2022	EH	Review Wallace decl and organize exhibits to file re same.	1.1	
5/3/2022	EH	Draft index of exhibits to Wallace declaration.	0.8	
5/3/2022	KES	Review orders re Defs class cert opposition papers removed from docket and sealing orders; update index of opposition papers with current status and circulate to team.	1.7	
5/3/2022	KES	Download depo transcript and update TextMap.	0.3	
5/3/2022	KES	Review documents in Relativity for documents relevant to issues for class cert reply.	1.5	
5/4/2022	GCG	Legal and factual research for reply pleadings.	1.7	
5/4/2022	GCG	Conf w/ AX re revisions to Wallace reply declaration.	0.2	
5/4/2022	GCG	Emails to JSY and team re sham affidavit research.	0.3	
5/4/2022	GCG	Research and revise Wallace reply declaration.	1.5	
5/4/2022	GCG	Confs w/ KES and RB re exhibits to same.	0.3	
5/4/2022	GCG	Review pleadings in state case against Brookdale.	0.5	
5/4/2022	JSY	(Billing Judgment) Emails re COVID policies; research same.	0.0	0.3
5/4/2022	JSY	Emails re barrier lists.	0.2	
5/4/2022	JSY	Emails re sham affidavit rule.	0.1	
5/4/2022	JSY	Research re motion to exclude expert testimony.	0.8	
5/4/2022	JSY	Review Anderson transcript.	1.5	
5/4/2022	BBK	Reviewing AX report to team re personal identifying info that must be redacted per ND Cal Local Rules.	0.1	
5/4/2022	BBK	Reviewing/revising AX updated RBGG case task list.	0.1	
5/4/2022	BBK	Comm'ns w/ co-counsel re revisions to Wallace Reply Decl.	0.1	
5/4/2022	BBK	Reviewing comm'ns w/ co-counsel re Motion to Exclude Expert Testimony; revisions to access expert facility reports.	0.1	
5/4/2022	BBK	Planning project to analyze admissibility/weight of happy camper declarations for EH and KES.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 618

SERVICES

Date	Person	Description of Services	Hours	Discount
5/4/2022	BBK	Conferring w/ EH re analysis of DSS citations.	0.1	
5/4/2022	BBK	Conferring w/ EH & KES re analysis of happy camper declarations.	0.2	
5/4/2022	BBK	Conferring w/ KES re FU w/ process service company re declarations from servers re: failures to complete service.	0.1	
5/4/2022	BBK	Conferring w/ J. Thornton re DSS citation analysis.	0.1	
5/4/2022	BBK	Preparing/drafting BBK Reply Decl ISO Class Cert on happy camper depositions and DSS citations.	3.9	
5/4/2022	BBK	Conferring w/ AX re FU w/ happy camper declarant re: withdrawal statement.	0.2	
5/4/2022	BBK	Conferring w/ Veritext re transcript orders for 4/29 depositions.	0.1	
5/4/2022	AX	Call with GCG re case tasks.	0.3	
5/4/2022	AX	Review GBW comments re Reply declaration and correspondence with JSY re same.	0.5	
5/4/2022	AX	Review documents, draft and revise Wallace declaration.	3.5	
5/4/2022	EH	Reviewing and analyzing resident declarations filed in Defs' opposition for class cert and issue tagging.	3.6	
5/4/2022	EH	Confer with KES re analyzing resident declarations filed by def's in oppo to class cert.	0.3	
5/4/2022	EH	Organize to file exhibits for Wallace decl ISO class cert reply.	0.6	
5/4/2022	KES	Follow up with ACE re declarations of non-service for subpoenaed Def declarants.	0.8	
5/4/2022	KES	Organize Baier book excerpts for reply exhibit.	0.5	
5/4/2022	KES	Create chart to document information re Def declarants and begin Sharepoint review of class list and POA information for 224 declarants for class cert reply; confer BBK re same.	3.5	
5/4/2022	RB	Review and compile exhibits for reply brief.	3.1	
5/5/2022	GCG	Email to BU and team re wrongful death cases and use in reply.	0.2	
5/5/2022	GCG	Conf w/ JSY and email to JSY and MJ re motion to strike Anderson testimony.	0.2	
5/5/2022	GCG	Review letter designating Anderson as confidential.	0.1	
5/5/2022	GCG	Conf w/ BBK re reply declaration.	0.1	
5/5/2022	GCG	Review letter from ER re happy camper depositions.	0.1	
5/5/2022	GCG	Continue reviewing documents for reply.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 619

SERVICES

Date	Person	Description of Services	Hours	Discount
5/5/2022	GCG	Legal and factual research for reply.	0.3	
5/5/2022	JSY	Emails re article re wrongful death case.	0.1	
5/5/2022	JSY	Emails re letter from ER.	0.1	
5/5/2022	JSY	Emails re updating barrier lists.	0.2	
5/5/2022	JSY	Emails re deposition excerpts.	0.2	
5/5/2022	JSY	Conf. w/ GCG re current projects re reply.	0.2	
5/5/2022	JSY	Conf. w/ GCG re CB book excerpts.	0.1	
5/5/2022	JSY	Conf. w/ KES and BB re finding other cases against Brookdale.	0.1	
5/5/2022	JSY	Review Anderson deposition transcript and declaration and draft Reply Dec. of Mastin; emails re Anderson motion to exclude.	1.1	
5/5/2022	BBK	Preparing/drafting BBK Reply Decl and exhibits.	8.3	
5/5/2022	BBK	Reviewing 5/5 E. Rutner FU letter re depositions of BD residents; conferring w/ JSY re same.	0.2	
5/5/2022	BBK	Conferring w/ Veritext re depo transcripts.	0.1	
5/5/2022	BBK	Follow-up calls to BD Paulin Creek resident and case manager for BD happy camper re: withdrawal statements.	0.1	
5/5/2022	BBK	Conferring w/ KES and RB re research into wrongful death actions v BD.	0.1	
5/5/2022	BBK	Meeting w/ GCG re BBK Reply Decl.	0.1	
5/5/2022	BBK	Conferring w/ KES re analysis of HC declarations for BBK Reply Decl.	0.2	
5/5/2022	BBK	Conferring w/ EH re analysis of HC declarations for BBK Reply Decl.	0.2	
5/5/2022	BBK	Conferring w/ RBGG team re K. Bowman errata sheets for 30(b)(6) transcripts; conferring w/ team re Pls' objections to Ds' 2d Set of RFPs.	0.1	
5/5/2022	BBK	Reviewing co-counsel comm'ns w/ G. Maatman re: Ds' belated designation of expert testimony as confidential; reviewing JSY-MJ comm'ns re motion to exclude Ds' expert testimony.	0.1	
5/5/2022	BBK	Conferring by phone w/ AX re evidence for Wallace Reply Decl and BBK Reply Decls.	0.3	
5/5/2022	AX	Review Brookdale documents re centralized complaints and email correspondence with team re same.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/5/2022	AX	Review deposition transcripts.	1.2	
5/5/2022	AX	Email correspondence with team re case tasks.	0.4	
5/5/2022	AX	Call with BBK re complaint database.	0.3	
5/5/2022	AX	Call with EH re Reply brief.	0.2	
5/5/2022	AX	Review documents, revise, and draft Wallace declaration.	1.5	
5/5/2022	EH	Reviewing and analyzing resident declarations filed in Defs' opposition to class cert and issue tagging.	4.6	
5/5/2022	EH	Confer with AX re complaints and issue registers for class cert reply.	0.4	
5/5/2022	KES	Download depo transcript and upload to TextMap; check for transcript erratas.	0.5	
5/5/2022	KES	Complete Sharepoint check for 224 Def declarants re class list appearance and POAs; update declarant chart re same.	7.0	
5/5/2022	RB	Create depo excerpts for reply brief.	0.8	
5/6/2022	GCG	(Billing Judgment) Conference with deputy AG and DA re Brookdale judgment for use on reply.	0.0	0.5
5/6/2022	GCG	Research and revise Wallace reply declaration.	0.5	
5/6/2022	GCG	Review and revise BBK declaration.	0.5	
5/6/2022	GCG	Conference with BBK re BBK declaration.	0.2	
5/6/2022	GCG	Review video of happy camper deposition for use on reply.	0.5	
5/6/2022	GCG	Emails JSY-team re video of happy camper deposition for use on reply.	0.3	
5/6/2022	GCG	Prepare for and conduce meetings with Schneider Wallace & BU.	1.0	
5/6/2022	GCG	Follow-up meeting with RBGG team re revisions to reply declarations and gathering exhibits.	0.3	
5/6/2022	JSY	Call with MTJ and BU re Motion to Exclude.	0.5	
5/6/2022	JSY	Call with GCG re motion to exclude and other case tasks.	0.2	
5/6/2022	JSY	Call with BU re Labor Detail Report review project.	0.3	
5/6/2022	JSY	Emails re letter from ER.	0.1	
5/6/2022	JSY	Emails re RFP responses.	0.1	
5/6/2022	JSY	Team meeting re case tasks (1.0); RBGG only meeting re case tasks (0.3).	1.3	
5/6/2022	JSY	Update case tasks list.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/6/2022	JSY	Emails re supplemental declaration from expert.	0.1	
5/6/2022	JSY	Multiple emails re deposition issues.	0.2	
5/6/2022	JSY	Set up motion to exclude.	0.2	
5/6/2022	BBK	Reviewing M. Johnson draft response to 5/5 E. Rutner letter re canceled depositions; conferring w/ JSY re same.	0.1	
5/6/2022	BBK	(Billing Judgment) attending to payment of invoice for 4/29 deposition of BD resident in Ontario.	0.0	0.1
5/6/2022	BBK	Reviewing JSY reports re Labor Detail Report analysis for Reply ISO Class Cert.	0.1	
5/6/2022	BBK	Planning/preparing/drafting BBK Reply Decl.	4.6	
5/6/2022	BBK	Meeting w/ co-counsel re Reply ISO Class Cert.	1.0	
5/6/2022	BBK	RBGG team meeting re Reply ISO Class Cert.	0.3	
5/6/2022	BBK	Reviewing/revising M. Johnson draft response to 5/5 E. Rutner letter re canceled depositions; conferring w/ co-counsel and sending same to E. Rutner.	0.3	
5/6/2022	BBK	Reviewing/conferring w/ team re Ds' tardy filing of supplemental expert declaration.	0.1	
5/6/2022	BBK	Reviewing RB report re analysis of wrongful death actions v. BD.	0.1	
5/6/2022	BBK	Reviewing/commenting on JSY updated RBGG task list.	0.1	
5/6/2022	BBK	Conferring w/ team re ensuring depo transcripts sent by court reporters to BD resident deponents.	0.1	
5/6/2022	BBK	Meeting w/ GCG re BBK Reply Decl revisions.	0.3	
5/6/2022	BBK	Reviewing notice from Ds re production of plans of operation for BD facilities and M. Johnson report re contents of same.	0.1	
5/6/2022	BBK	Conferring w/ team re video of 4/11 deposition of BD North Euclid resident.	0.1	
5/6/2022	AX	Cocounsel and RBGG meeting re strategy for Reply brief.	1.2	
5/6/2022	AX	Review case law and related correspondence with team.	0.5	
5/6/2022	AX	Review case task list and revise.	0.3	
5/6/2022	AX	Review emails and email correspondence with team re Reply brief.	1.5	
5/6/2022	AX	Draft Wallace declaration and review emails re Service Alignment.	1.5	
5/6/2022	EH	Correspondence with BBK re resident declarants filed by defs' ISO class cert oppo.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/6/2022	EH	Confer with team and co-counsel re class cert reply motion.	1.2	
5/6/2022	KES	Zoom meeting with co-counsel and RBGG re class cert reply.	1.5	
5/6/2022	KES	Download and circulate supp Saad Decl and confer team re same.	0.2	
5/6/2022	KES	Follow up re outstanding declarations of non-service on Def declarant subpoenas.	0.3	
5/6/2022	KES	Review draft Wallace reply declaration and gather referenced exhibits re same; update exhibit chart re same and cross-reference with prior depo exhibits.	6.3	
5/6/2022	KES	Follow up re depo transcripts.	0.2	
5/6/2022	RB	Conduct research re Defendant financial filings.	1.8	
5/6/2022	RB	Research recent lawsuits filed against Defendant.	2.2	
5/7/2022	GCG	Review documents for reply pleadings.	0.8	
5/7/2022	GCG	Email JSY-BU re documents for reply pleadings.	0.1	
5/7/2022	JSY	Review labor detail reports and find examples for Reply; emails re same.	3.2	
5/8/2022	GCG	Review documents for reply pleadings.	0.5	
5/8/2022	GCG	Legal research for reply.	0.1	
5/8/2022	GCG	Emails JSY- AX re reply.	0.1	
5/8/2022	JSY	Review and analyze labor detail reports; emails re same.	4.0	
5/8/2022	BBK	Reviewing comm'ns w/ co-counsel re prep for Reply ISO class cert.	0.1	
5/8/2022	BBK	Reviewing G Wallace updated outline for Reply Brief.	0.1	
5/8/2022	BBK	Drafting/revising BBK Reply Decl (including conducting analysis of resident declarations and DSS citations).	7.3	
5/8/2022	KES	Continuing gathering reply exhibits and update master index re same.	3.0	
5/9/2022	GCG	Prepare for and meet with RBGG team re revisions to reply declarations and gathering exhibits for same.	0.8	
5/9/2022	GCG	Review documents for reply.	0.5	
5/9/2022	GCG	Emails JSY-team re document review for reply pleadings.	0.3	
5/9/2022	GCG	Email BK re SNF case.	0.2	
5/9/2022	JSY	Call with BU re Labor Detail Report review project.	0.2	
5/9/2022	JSY	Call with KES re document review project.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2022	JSY	Team meeting re Reply tasks.	0.5	
5/9/2022	JSY	Update to do list; emails with team re same.	0.2	
5/9/2022	JSY	Review labor detail reports; analyze same; emails re same.	3.7	
5/9/2022	BBK	Conferring w/ KES and EH re laying foundation for their analyses of resident declarations for BBK Reply Decl.	0.3	
5/9/2022	BBK	Conferring by phone w/ KES re analysis of BD resident declarations.	0.3	
5/9/2022	BBK	Conferring w/ KES re FU w/ process server company re: declarations of non-service of depo subpoenas to BD resident declarants.	0.1	
5/9/2022	BBK	Drafting BBK Reply Decl.	1.1	
5/9/2022	BBK	Digesting transcripts of BD resident depositions to ID potential depo transcripts for Reply.	2.4	
5/9/2022	BBK	PC w/ BD Paulin Creek resident/declarant re: withdrawal statement; updating team re same.	0.1	
5/9/2022	BBK	Left VM for case manager for BD Redwood City resident re withdrawal statement.	0.1	
5/9/2022	BBK	Conferring w/ EH/KES re transcript of C. Flores deposition.	0.1	
5/9/2022	BBK	Conferring w/ AX re list of current BD facilities.	0.1	
5/9/2022	BBK	Reviewing comm'ns w/ co-counsel re Wallace Reply Decl.	0.1	
5/9/2022	BBK	Meeting w/ RBGG team re Reply ISO Class Cert.	0.5	
5/9/2022	BBK	Drafting/sending report to co-counsel re draft BBK Reply Decl and DSS citations.	0.2	
5/9/2022	BBK	Researching and preparing DSS-citation-related responses to Ds' statements in Cert Opposition.	1.4	
5/9/2022	AX	Review and draft email correspondence with team re case tasks for Reply.	0.6	
5/9/2022	AX	Draft Wallace declaration and review documents for draft.	4.8	
5/9/2022	EH	Confer with team re steps for class cert reply.	0.6	
5/9/2022	EH	Organize and excerpt exhibits for BBK decl (1.5); and correspondence re same (.3).	1.8	
5/9/2022	EH	Organize and excerpt exhibits for Wallace decl (1.8); confer with KES re same (.2).	2.0	
5/9/2022	EH	Confer with BBK re BBK decl and resident depositions.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 624

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2022	KES	Review sharepoint and correspondence re timing, Bates of production, and content of class lists; draft summary of same and email BBK re same in connection with class cert reply declaration.	1.7	
5/9/2022	KES	Team Zoom class cert checkin.	0.5	
5/9/2022	KES	Follow up re outstanding ACE non-service declarations.	0.2	
5/9/2022	KES	Follow up re missing expert transcripts; upload Flores transcript to TextMap.	0.3	
5/9/2022	KES	Cross-check 14 Def declarants who did not show up in Sharepoint with status on native excel class lists in connection with BBK reply declaration.	2.0	
5/9/2022	KES	Review Labor Detail Reports for Anaheim, Brea, Central Whittier and update summary chart with potential quotes for Wallace exhibit; confer JY re same.	4.0	
5/10/2022	GCG	Prepare for and conduct meeting with co-counsel to discuss reply pleadings.	1.0	
5/10/2022	GCG	Conference with JSY, BBK and KES and emails with team regarding same and regarding overall strategy and approach.	0.4	
5/10/2022	GCG	Review pleadings and other documents for reply.	0.6	
5/10/2022	JSY	Emails re barrier lists.	0.4	
5/10/2022	JSY	Team meeting re case tasks.	1.0	
5/10/2022	JSY	Draft RJN.	1.3	
5/10/2022	JSY	Multiple conf. w/ BBK, GCG, KES re issues with documents for Reply.	0.5	
5/10/2022	JSY	Review Labor Detail Reports; analyze same; emails re same.	2.0	
5/10/2022	BBK	Reviewing G-Maatman - M. Johnson comm'ns re: D's untimely confidentiality designations for portions of Ds' expert testimony and re: improper filing of supplemental Saad Expert Decl.	0.1	
5/10/2022	BBK	Conferring w/ KES re ensuring 4/29 BD Redwood City declarant is provided depo transcript by court reporter.	0.1	
5/10/2022	BBK	Conducting analysis of DSS citations and drafting write-up for Reply Brief re same.	4.0	
5/10/2022	BBK	Meeting w/ co-counsel on Reply ISO Class Cert.	0.9	
5/10/2022	BBK	Conferring w/ JSY re motion to exclude portions of Ds' expert opinion.	0.1	
5/10/2022	BBK	Conferring w/ GCG re motion to exclude portions of Ds' expert opinion and Reply tasks.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 625

SERVICES

Date	Person	Description of Services	Hours	Discount
5/10/2022	AX	Legal research re Reply brief and related email correspondence.	2.8	
5/10/2022	AX	Draft Wallace declaration.	1.5	
5/10/2022	EH	Organize to file and review exhibits for BBK decl ISO class cert reply.	2.9	
5/10/2022	EH	Revise index of exhibits to Wallace decl ISO class cert reply.	0.9	
5/10/2022	EH	Weekly meeting with team re steps for class cert reply.	0.6	
5/10/2022	KES	Online research re Kern Sup Ct case vs Brookdale.	0.5	
5/10/2022	KES	Download invoices for Wallace exhibits; confer AX re organization re same.	1.0	
5/10/2022	KES	Revise summary chart re LDR quotes; review LDRs re North Fremont and Northridge and select quotes for same.	3.7	
5/11/2022	GCG	Research and revise Wallace reply declaration.	0.9	
5/11/2022	GCG	Research and revise Request for Judicial Notice in support of reply.	0.4	
5/11/2022	GCG	Emails GW-MJ-team re motions to exclude and reply pleadings.	0.3	
5/11/2022	GCG	Conferences and emails with JSY, AX and KES re motions to exclude and reply pleadings.	0.2	
5/11/2022	GCG	Legal research for reply.	0.2	
5/11/2022	JSY	Emails re barrier lists.	0.2	
5/11/2022	JSY	Emails and conf. with team re Reply tasks.	0.3	
5/11/2022	JSY	Draft RJN; research same.	1.6	
5/11/2022	JSY	Messages and conf. re ROG responses.	0.1	
5/11/2022	JSY	Review and analyze labor detail reports; emails re same.	1.0	
5/11/2022	JSY	Review BBK decl. and edit same; emails re same.	0.5	
5/11/2022	JSY	Review and edit Motion to Exclude; emails re same.	1.0	
5/11/2022	JSY	Emails re motion to strike.	0.2	
5/11/2022	JSY	Emails re LDR review project.	0.2	
5/11/2022	BBK	Checking class lists to see if we have direct contact info for BD Redwood City declarant who stated she wants to withdraw declaration.	0.2	
5/11/2022	BBK	Conferring w/ JSY re motion to exclude Ds' experts.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/11/2022	BBK	Conferring w/ M Johnson and B Umpierre re meeting w/ D Marks team re C Flores Reply Decl.	0.2	
5/11/2022	BBK	Conferring w/ RBGG team re meeting w/ D Marks team re C Flores Reply Decl.	0.1	
5/11/2022	BBK	Emailing D Marks team re DSS citation analysis for Flores Reply Decl.	0.2	
5/11/2022	BBK	Conferring w/ EH re exhibits for BBK Reply Decl.	0.1	
5/11/2022	BBK	Drafting/revising BBK Reply Decl.	2.0	
5/11/2022	BBK	Reviewing/revising AX updated filing checklist for Reply.	0.1	
5/11/2022	BBK	Conferring w/ team re exhibits for Wallace Reply Decl.	0.2	
5/11/2022	BBK	Conferring w/ JSY and AX re reviewing BBK Reply Decl for factual accuracy.	0.1	
5/11/2022	BBK	Conferring w/ RBGG team re M. Johnson draft motion to exclude Ds' expert opinions and sealing motion for same.	0.2	
5/11/2022	BBK	Reviewing/commenting on JSY draft RJN and whether to seek judicial notice of DSS citations.	0.2	
5/11/2022	BBK	Conferring w/ team re moving to strike untimely filed Supp Saad Decl.	0.1	
5/11/2022	BBK	Researching/drafting motion to strike untimely filed Supp Saad Decl.	2.2	
5/11/2022	BBK	Conferring w/ RBGG team re reviewing/revising M. Johnson draft motion to strike Supp Saad Decl.	0.1	
5/11/2022	BBK	Reviewing/revising M. Johnson draft motion to strike Supp Saad Decl.	1.1	
5/11/2022	AX	Legal research on judicial admissions and related correspondence with team.	2.5	
5/11/2022	AX	Review documents on state SNF judgment.	1.2	
5/11/2022	AX	Email correspondence with team re Wallace declaration exhibits and other reply related projects.	1.2	
5/11/2022	AX	Revise Wallace declaration and other Reply tasks.	3.0	
5/11/2022	EH	Confer with AX re Wallace declaration exhibits for class cert reply.	0.2	
5/11/2022	EH	Review draft Wallace declaration and revise index of exhibits re same.	2.4	
5/11/2022	EH	Organize to file exhibits for Wallace decl ISO class cert reply.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 627

SERVICES

Date	Person	Description of Services	Hours	Discount
5/11/2022	KES	Review invoices for Wallace reply exhibit and confirm BKD information in each; organize and create index for draft invoice exhibit.	4.0	
5/11/2022	KES	Review and circulate ACE declarations of non-service on subpoenaed declarants.	0.2	
5/11/2022	KES	Continue review and summary of comments for LDRs for Wallace reply exhibit.	3.0	
5/11/2022	KES	Gather Saad and Anderson excerpts cited in draft brief.	0.8	
5/11/2022	KES	Draft initial Admin Motion to File Under Seal.	0.6	
5/12/2022	GCG	Review and revise Wallace reply declaration.	0.5	
5/12/2022	GCG	Conference with JSY and emails with MJ & JSY re motions to exclude expert testimony and supplemental declaration of Saad.	0.5	
5/12/2022	GCG	Revise email to courtroom deputy re motions to exclude expert testimony and supplemental declaration of Saad.	0.1	
5/12/2022	GCG	Review portion of draft reply brief.	0.5	
5/12/2022	GCG	Meet with RBGG team re preparation for reply filing and motions to seal.	0.5	
5/12/2022	JSY	Call with GCG re Motion to Enforce and Motion to Strike.	0.3	
5/12/2022	JSY	Emails and calls re hearing dates, motion to strike, and email with clerk; research re same.	1.0	
5/12/2022	JSY	Emails re barrier list updates.	0.3	
5/12/2022	JSY	Team meeting re Reply case tasks.	0.9	
5/12/2022	JSY	Edit RJN; emails re same.	0.6	
5/12/2022	JSY	Emails with RLS re declaration.	0.1	
5/12/2022	JSY	Emails with TC re Kailes Decl.	0.1	
5/12/2022	JSY	Emails re BEST audit.	0.2	
5/12/2022	JSY	Emails re sealing motions.	0.2	
5/12/2022	JSY	Review LDR reports; analyze same.	2.5	
5/12/2022	BBK	Reviewing M. Johnson revised draft Motion to Strike and supporting declaration.	0.2	
5/12/2022	BBK	Conferring w/ team re reserving hearing dates for Motion to Strike Supp Saad Decl and Motion to Exclude Ds' Expert Opinions.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 628

SERVICES

Date	Person	Description of Services	Hours	Discount
5/12/2022	BBK	Reviewing M Johnson proposal re filing motion to exclude Ds' expert opinions on 5/19 and conferring w/ RBGG team re same.	0.1	
5/12/2022	BBK	Emails re preparing Motion to Strike and supporting papers.	0.2	
5/12/2022	BBK	Proof-reading / cite-checking / finalizing Motion to Strike Supp Saad Declaration and Attorney Decl; preparing Proposed Order granting same.	1.2	
5/12/2022	BBK	(Billing Judgment) Reviewing JSY-courtroom deputy comm'ns re hearing date for Motion to Strike Supp Saad Decl; conferring w/ team re same.	0.0	0.2
5/12/2022	BBK	Conferring w/ M. Johnson re filing Motion to Strike Supp Saad Decl.	0.1	
5/12/2022	BBK	Conferring w/ team re timing/plan for admin motion to shorten hearing date for Motion to Strike Supp Saad Decl.	0.1	
5/12/2022	BBK	Conferring w/ team re receipt of withdrawal statement from BD Paulin Creek resident.	0.1	
5/12/2022	BBK	Left voice mail for case manager for BD Redwood City resident who stated she wanted to withdraw declaration.	0.1	
5/12/2022	BBK	Identifying/preparing proposed deposition excerpts from BD resident depositions for BBK Reply Decl.	1.2	
5/12/2022	BBK	Conferring w/ team re exhibits for Wallace Reply Decl.	0.3	
5/12/2022	BBK	Reviewing AX research re admissions in Answer binding on BD.	0.1	
5/12/2022	BBK	RBGG team meeting re prep for Reply ISO Class Cert.	0.8	
5/12/2022	BBK	Conferring w/ AX re Flores deposition excerpts for Wallace Reply Decl.	0.2	
5/12/2022	BBK	Reviewing e-mails w/ co-counsel re status of Cross Reply Decl, Waters/Mastin access reports, and RLS Reply Decl.	0.1	
5/12/2022	BBK	Conferring w/ EH re creating Sharefile for exhibits to BBK Reply Decl.	0.2	
5/12/2022	BBK	Drafting paragraphs for BBK Reply Decl re recently received withdrawal statement and sponsoring index of DSS citations directly related to caregiver understaffing.	0.4	
5/12/2022	BBK	Reviewing Ds' emails re production of plans of operations and Rog Responses re BD bank accounts IRT court's order.	0.1	
5/12/2022	AX	Email correspondence w/ team re sealing motions.	0.5	
5/12/2022	AX	Update filing checklist.	0.3	
5/12/2022	AX	Discuss Wallace declaration exhibits with KES.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 629

SERVICES

Date	Person	Description of Services	Hours	Discount
5/12/2022	AX	Email correspondence w/ team SNF judgment and filings and related review.	0.5	
5/12/2022	AX	Team check in re Reply projects.	0.5	
5/12/2022	AX	Call with GCG re case tasks.	0.1	
5/12/2022	AX	Revise and draft Wallace declaration.	5.5	
5/12/2022	EH	Confer with team re reply declarations and next steps.	0.9	
5/12/2022	EH	Organizing and finalizing exhibits to BBK declaration ISO reply class cert motion.	1.8	
5/12/2022	EH	Organizing and excerpting declarations for Wallace decl.	1.3	
5/12/2022	KES	Review latest draft of Wallace Decl, continue to gather and organize exhibits for same; update master index for same.	8.5	
5/12/2022	KES	Calendar deadlines for Motion to Strike supp Saad Decl.	0.2	
5/13/2022	GCG	Review and revise Wallace reply declaration and exhibits.	1.8	
5/13/2022	GCG	Review and revise Bien-Kahn declaration and exhibits.	2.0	
5/13/2022	GCG	Prepare for and conduct team meeting w/ co-counsel re reply pleadings.	1.0	
5/13/2022	GCG	Confs w/ and emails to JSY and team re same.	1.0	
5/13/2022	GCG	Conf w/ AX re sealing standard.	0.2	
5/13/2022	JSY	Meeting with AX and KES re sealing motions.	0.5	
5/13/2022	JSY	Team meeting re Reply tasks.	1.0	
5/13/2022	JSY	Emails re barrier lists; update same.	1.0	
5/13/2022	JSY	Edit GBW declaration; emails re same.	4.7	
5/13/2022	JSY	Emails re reply documents and additional factual support.	0.2	
5/13/2022	BBK	(Billing Judgment) attending to payment of Veritext invoice for HC deposition.	0.0	0.1
5/13/2022	BBK	Reviewing draft RLS reply declaration and updated tables re putative CM declarants.	0.1	
5/13/2022	BBK	Drafting/sending FU email to D. Marks and J. Thornton re Flores Reply Decl and DSS citation analysis.	0.2	
5/13/2022	BBK	Conferring w/ J. Thornton re Flores Reply Decl and DSS citation analysis and updating RBGG team re same.	0.1	
5/13/2022	BBK	Conferring w/ EH re exhibits for BBK Reply Decl.	0.3	
5/13/2022	BBK	Conferring w/ team re plan to finalize access reports and exhibits for reply declarations.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/13/2022	BBK	Conferring w/ GCG re depo excerpts from resident depositions.	0.1	
5/13/2022	BBK	Conferring w/ team re Wallace Reply Decl and Exhibits.	0.2	
5/13/2022	BBK	Revising BBK Reply Decl.	0.5	
5/13/2022	BBK	Reviewing AX updated checklist for Reply.	0.1	
5/13/2022	BBK	Co-counsel meeting re Reply.	1.1	
5/13/2022	BBK	Drafting/sending shortened Reply insert for G. Wallace re DSS citations.	0.2	
5/13/2022	BBK	Reviewing/incorporating changes by GCG into deposition excerpts from resident depositions for BBK Rely Decl and revising same.	1.1	
5/13/2022	BBK	Drafting/sending email to co-counsel re BBK Reply Decl.	0.1	
5/13/2022	AX	Meeting with JSY, KS re admin motions to seal and other Reply tasks.	0.6	
5/13/2022	AX	Meeting with team re Reply projects.	1.2	
5/13/2022	AX	Review Brookdale production and related correspondence with team.	0.5	
5/13/2022	AX	Revise Wallace declaration.	1.5	
5/13/2022	AX	Email correspondence with team re exhibits for Wallace declaration and other Reply projects.	1.5	
5/13/2022	EH	Weekly team meeting re class cert reply.	1.0	
5/13/2022	EH	Confer with RB re BBK decl exhibits and Wallace decl exhibits ISO class cert reply.	0.3	
5/13/2022	EH	Correspondence with BBK re exhibits for BBK decl ISO class cert reply.	0.3	
5/13/2022	EH	Confer with RB re edits to resident depo transcript excerpts.	0.3	
5/13/2022	KES	Compare Defs original opposition brief, with under seal version and refiled redacted version; email team with discrepancies.	0.8	
5/13/2022	KES	Zoom meeting re class cert.	1.3	
5/13/2022	KES	Attention to sealing issues and revise master exhibit index re same.	3.0	
5/13/2022	KES	Continue review, gathering and preparation of Wallace reply exhibits.	3.5	
5/13/2022	RB	Meet with EH re declarations in support of reply for class certification.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 631

SERVICES

Date	Person	Description of Services	Hours	Discount
5/13/2022	RB	Revise BBK declaration deposition excerpts and email team re same.	1.0	
5/13/2022	RB	Organize labor detail reports and email JSY re same.	0.2	
5/13/2022	RB	Compile and revise Baier book excerpts for GBW declaration exhibit.	1.1	
5/14/2022	GCG	Confs w/ MJ, BBK, JSY, RB and emails to KES, AX and team re revisions to Wallace and BBK reply declarations and exhibits.	2.0	
5/14/2022	GCG	Continued review of deposition excepts and other documents for use on reply.	0.7	
5/14/2022	GCG	Email to GW re letter from Fountaingrove demanding increased and better trained staff.	0.2	
5/14/2022	JSY	Emails re barrier list updates.	0.3	
5/14/2022	JSY	Edit GBW Declaration; emails re same.	1.7	
5/14/2022	JSY	Meeting with GCG and MTJ re book excerpts.	0.5	
5/14/2022	JSY	Edit facility reports; research re same; emails re same.	1.8	
5/14/2022	JSY	Analyze and gather named plaintiff testimony; emails re same.	1.8	
5/14/2022	JSY	Emails re Labor Detail Reports.	0.2	
5/14/2022	JSY	Emails and calls re depo excerpts.	0.4	
5/14/2022	JSY	Review and analyze labor detail reports; emails re same.	1.9	
5/14/2022	BBK	Reviewing comm'ns w/ co-counsel re identifying facts for Wallace Reply Decl and revising access reports.	0.1	
5/14/2022	BBK	Reviewing/responding to M. Johnson global comments/questions for BBK Reply Decl.	0.3	
5/14/2022	BBK	Preparing/sending assignment to RB re preparing depo excerpt exhibits for BBK reply decl.	0.2	
5/14/2022	BBK	Reviewing comm'ns w/ co-counsel re named Plaintiffs testimony; reviewing JSY report re Wallace Reply Decl status.	0.1	
5/14/2022	BBK	Revising BBK Reply Decl to incorporate/address M. Johnson questions and potential hearsay objections.	3.2	
5/14/2022	BBK	Conferring w/ JSY and AX re preparing Reply.	0.1	
5/14/2022	BBK	Conferring w/ KES re tasks for BBK Reply Decl and sealing motions.	0.1	
5/14/2022	BBK	Conferring w/ RB re exhibits for BBK Reply Decl.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/14/2022	BBK	Legal research/analysis re applicability of hearsay exceptions to evidence in BBK Reply Decl.	1.9	
5/14/2022	BBK	TC w/ GCG re hearsay research and BBK Reply Decl status.	0.2	
5/14/2022	BBK	Drafting outline of arguments for admissibility of evidence in BBK Reply Decl in response to potential hearsay objections.	0.9	
5/14/2022	BBK	Conferring w/ JSY re modifying depo excerpts from 4/11 resident deposition.	0.1	
5/14/2022	BBK	Conferring w/ JSY and AX re responding to Ds' argument re damages.	0.2	
5/14/2022	BBK	Drafting/sending email to GCG and RBGG team re BBK Reply Decl and responding to hearsay objections.	0.2	
5/14/2022	AX	Revise GBW declaration and related review of exhibits.	6.0	
5/14/2022	AX	Correspondence with RB re deposition excerpts.	0.7	
5/14/2022	AX	Email correspondence w/ team re CCRCs and Service Alignment.	0.4	
5/14/2022	AX	Email correspondence w/ team re various reply projects.	0.5	
5/14/2022	KES	Update master Wallace exhibit index, including information re documents to be filed under seal.	3.0	
5/14/2022	KES	Review additional labor detail reports in Relativity and email JY and BU re possible quotes.	3.9	
5/14/2022	KES	Emails with team re depo excerpts for exhibits.	0.3	
5/14/2022	RB	Prepare book excerpts for reply filing.	3.0	
5/14/2022	RB	Prepare deposition excerpt exhibits for reply in support of class certification.	6.5	
5/15/2022	GCG	Review and revise BBK reply declaration and exhibits.	1.0	
5/15/2022	GCG	Conf w/ and emails to BBK re same.	0.5	
5/15/2022	GCG	Review and revise Wallace reply declaration and exhibits.	1.7	
5/15/2022	GCG	Confs w/ JSY and AX and emails to AX and team re same.	1.0	
5/15/2022	GCG	Emails to GW, MJ and TC re reply pleadings and documents.	1.0	
5/15/2022	JSY	Call with KES re barrier lists.	0.3	
5/15/2022	JSY	Call with KES and BU re LDR analysis.	0.3	
5/15/2022	JSY	Call with GCG and AX re GBW declaration status.	0.2	
5/15/2022	JSY	Review named plaintiff depos re damages issues.	0.5	
5/15/2022	JSY	Update barrier lists; emails re same.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2022	JSY	Review and analyze labor detail reports; emails re same.	3.2	
5/15/2022	JSY	Emails re Kailes declaration; review same.	0.5	
5/15/2022	JSY	Review named plaintiff testimony; prepare same for Reply.	1.0	
5/15/2022	BBK	Fact-checking/cite-checking BBK Reply Decl.	9.2	
5/15/2022	BBK	Reviewing comm'ns w/ team re Labor Detail Report project; Wallace Reply Decl, and finalizing access reports.	0.1	
5/15/2022	BBK	Conferring w/ RBGG team re exhibit numbering for declarations & citations to D's opposition filings.	0.1	
5/15/2022	BBK	PC w/ GCG re BBK Reply Decl.	0.1	
5/15/2022	BBK	Reviewing GCG comments on BBK Reply Decl and incorporating revisions accordingly.	0.4	
5/15/2022	BBK	Conferring w/ RBGG team re redactions to BBK Reply Decl.	0.1	
5/15/2022	BBK	Conferring w/ RB re preparing/correcting exhibits for BBK Reply Decl.	0.4	
5/15/2022	BBK	Conferring w/ JSY and GCG re depo excerpts for BBK Reply Decl.	0.1	
5/15/2022	BBK	Drafting status report emails to RBGG team re BBK Reply Decl and Exhibits.	0.1	
5/15/2022	BBK	Conferring w/ KC re BBK Reply Decl Exhibits.	0.2	
5/15/2022	BBK	Conferring w/ AX re Wallace Reply Decl paragraph introducing Flores Depo Excerpts.	0.1	
5/15/2022	BBK	Conferring w/ RBGG team and T. Close re Kailes Reply Decl and exhibits thereto.	0.2	
5/15/2022	AX	Revise Wallace declaration and related correspondence with team.	5.5	
5/15/2022	AX	Email correspondence with team re Reply projects.	1.0	
5/15/2022	AX	Review exhibits for inclusion in Wallace declaration.	1.0	
5/15/2022	AX	Update filing checklist.	0.3	
5/15/2022	AX	Email correspondence w/ team re legal standards.	0.8	
5/15/2022	KES	Continue compiling Wallace reply exhibits, including download of Labor Detail Reports from Relativity and supervision of PDF preparation; emails with team re exhibits; update master chart re same.	9.0	
5/15/2022	RB	Prepare exhibits to BBK declaration ISO class certification reply.	2.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2022	RB	Prepare video and book excerpt exhibits to declaration ISO class certification reply.	1.4	
5/15/2022	RB	Review errata sheets for deposition excerpt exhibits to GBW declaration ISO class certification reply.	0.9	
5/15/2022	RB	Review GBW declaration ISO class certification reply and prepare exhibits.	3.2	
5/16/2022	GCG	Review and comment on draft reply brief.	2.0	
5/16/2022	GCG	Confs w/ JSY and BBK and emails to team re revisions to reply pleadings and exhibits.	0.8	
5/16/2022	GCG	Conf w/ and email to DM re reply declarations.	0.2	
5/16/2022	GCG	Prepare for and conduct meeting w/ RBGG team re reply pleadings.	0.5	
5/16/2022	GCG	Prepare for and conduct meeting w/ SW and BU re reply pleadings.	0.5	
5/16/2022	JSY	Team meeting re Reply tasks.	1.0	
5/16/2022	JSY	Meeting re RBGG tasks for reply.	0.3	
5/16/2022	JSY	Multiple calls re reply documents.	0.5	
5/16/2022	JSY	Draft and edit various documents re Reply; emails re same.	7.5	
5/16/2022	JSY	Two calls with BBK and AX re Reply document issues.	0.5	
5/16/2022	BBK	Conferring w/ RB and KC re finalizing BBK Reply Decl Exhibits.	0.1	
5/16/2022	BBK	Cite-checking and fact-checking BBK Reply Decl.	4.7	
5/16/2022	BBK	Conferring w/ BU re Flores Reply Decl and reviewing/commenting on draft paragraphs re DSS citations.	0.2	
5/16/2022	BBK	Conferring w/ team re Kailes Reply Declaration and Exhibits.	0.1	
5/16/2022	BBK	Co-counsel meeting re Reply ISO Class Cert.	1.2	
5/16/2022	BBK	Reviewing GCG update re call w/ D. Marks re status of Expert Reply Decls; reviewing comm'ns re Cross Reply Decl.	0.1	
5/16/2022	BBK	Conferring w/ team re additions to Wallace Reply Decl ISO Motion to Exclude Opinions of Ds' Experts.	0.1	
5/16/2022	BBK	RBGG team meeting re Reply ISO Class Cert.	0.4	
5/16/2022	BBK	Conferring w/ AX and JSY re what to file under seal for BBK Reply Decl and legal standards re same.	0.5	
5/16/2022	BBK	Reviewing/responding to G. Wallace comments on BBK Reply Decl.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
5/16/2022	BBK	Revising BBK Reply Decl to incorporate G. Wallace comments and proof-reading same.	1.3	
5/16/2022	BBK	Reviewing GCG and AX comments on Reply Brief.	0.1	
5/16/2022	BBK	Reviewing Reply Brief sections on resident declarations and DSS citations and drafting comments on same.	0.3	
5/16/2022	BBK	Reviewing/correcting/marking for redactions BBK Reply Decl Exhibits.	1.4	
5/16/2022	BBK	Conferring w/ RB re redactions for BBK Reply Decl exhibits.	0.2	
5/16/2022	AX	Email correspondence w/ team re projects for Reply filing.	0.5	
5/16/2022	AX	Meeting with team re Reply projects.	1.4	
5/16/2022	AX	Email correspondence re cite check and review of those revisions.	0.8	
5/16/2022	AX	Revise and reorganize Wallace declaration according to comments from team.	4.8	
5/16/2022	AX	Update filing check list.	0.3	
5/16/2022	AX	Email correspondence w/ team re updates to Wallace declaration.	0.4	
5/16/2022	AX	Email correspondence w/ team re comments on brief.	0.7	
5/16/2022	AX	Email correspondence w/ team re statements in Wallace declaration that need additional evidence.	0.5	
5/16/2022	AX	Misc other projects.	1.0	
5/16/2022	EMA	(Billing Judgment) Complete cite check of declaration for reply in support of class certification.	0.0	2.2
5/16/2022	KES	Zoom meeting with co-counsel re class cert reply.	1.3	
5/16/2022	KES	Continue compiling exhibits for Wallace Reply Declaration; review, revise and finalize Labor Detail report exhibit.	8.2	
5/16/2022	RB	Prepare exhibits to BBK declaration ISO class certification reply.	0.5	
5/16/2022	RB	Review and compile exhibits to GBW declaration ISO class certification reply.	1.3	
5/16/2022	RB	Attend team meeting re class certification reply filing.	0.4	
5/16/2022	RB	Update index of facility invoice exemplars for GBW declaration.	0.4	
5/16/2022	RB	Finalize and redact Kailes declaration ISO class certification reply.	0.5	
5/16/2022	RB	Compile LDR reports for class certification reply.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/16/2022	RB	Prepare and redact exhibits to BBK declaration ISO class cert reply.	1.4	
5/16/2022	RB	Update deposition transcript excerpts for GBW declaration ISO class cert reply.	0.5	
5/16/2022	RB	Review labor detail reports and prepare exhibit.	1.8	
5/17/2022	GCG	Prepare for and conduct meeting w/ SW and BU re reply pleadings.	0.6	
5/17/2022	GCG	Confs w/ JSY, RB and KES and emails to team re revisions to same.	0.7	
5/17/2022	GCG	Conf w/ and email to DM re reply declarations.	0.2	
5/17/2022	GCG	Research and revise motion to seal.	1.0	
5/17/2022	JSY	Team meeting re Reply documents.	0.9	
5/17/2022	JSY	Draft and edit documents re Reply; multiple emails and conf. re same.	6.2	
5/17/2022	JSY	Emails re sealing motions.	0.2	
5/17/2022	JSY	Review Cross Declaration for proposed redactions; mark same; emails with team re same.	1.0	
5/17/2022	JSY	Calls and messages re Reply documents.	0.3	
5/17/2022	BBK	Conferring w/ team re plan to finalizing BBK Reply Decl and Exhibits.	0.1	
5/17/2022	BBK	Meeting w/ JSY and AX re priority tasks for Reply.	0.5	
5/17/2022	BBK	Proof-reading BBK Reply Decl and redacted exhibits; signing same.	0.8	
5/17/2022	BBK	Conferring w/ RB re finalizing Under Seal and Redacted versions of BBK Reply Decl and Exhibits for filing.	0.2	
5/17/2022	BBK	Reviewing/correcting final Under Seal and Redacted versions of BBK Reply Decl and Exhibits.	0.5	
5/17/2022	BBK	Conferring w/ RB, KES and KC re applying corrections to Under Seal and Redacted BBK Reply Decl and Exhibits to ensure all markings are included and file size can be filed on ECF.	0.5	
5/17/2022	BBK	Conducting factual research for and drafting additions and citations for Wallace Reply Decl and Reply Brief to support portions of brief not already included in Reply Decl.	2.7	
5/17/2022	BBK	Co-counsel meeting re Reply prep.	0.8	
5/17/2022	BBK	Conferring w/ JSY and AX re immediate tasks for Reply and supporting docs.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2022	BBK	Conferring w/ team re finalizing/serving Ps' Responses to Ds' 2d Set of RFPs.	0.1	
5/17/2022	BBK	Conferring w/ BU and J Thornton re introducing index of DSS citations via Flores Reply Decl and reviewing/revising paragraphs in draft Flores Reply Decl re DSS citations.	0.6	
5/17/2022	BBK	Conferring w/ team re Motion to Seal Pls' Materials and Appendix re same.	0.2	
5/17/2022	BBK	Reviewing/responding to M. Johnson report re Mastin and Waters Reply Decls.	0.1	
5/17/2022	BBK	Researching/drafting Motion to Consider Whether to Seal Ds' Docs ISO Reply and Motion to Exclude and Proposed Order re same.	2.2	
5/17/2022	BBK	Conferring w/ JSY and AX re legal standards and approach for Motion to Seal and Motion to Consider Whether to Seal.	0.3	
5/17/2022	BBK	Drafting/sending updates to team re Motion to Seal and Motion to Consider Whether to Seal.	0.1	
5/17/2022	BBK	Reviewing updates re status of Kennedy and Cross Reply Decls.	0.1	
5/17/2022	BBK	Conferring w/ team re draft Flores Reply Decl and revisions thereto.	0.3	
5/17/2022	AX	Meeting re Wallace declaration additions with BBK, JSY.	0.6	
5/17/2022	AX	Meeting with RBGG team re Reply.	0.8	
5/17/2022	AX	Draft additions to the Wallace declaration and look for additional exhibits.	3.0	
5/17/2022	AX	Email correspondence w/ team re Wallace declaration exhibits and various other Reply projects.	0.8	
5/17/2022	AX	Draft motion to seal and related correspondence with team.	2.0	
5/17/2022	AX	Revise Wallace declaration and other Reply tasks.	2.0	
5/17/2022	KES	Serve response to Defs discovery requests.	0.2	
5/17/2022	KES	Compare local rules and HSG standing orders re Admin Motions to Seal, draft chart template for proposed order; confer team re compliance.	1.4	
5/17/2022	KES	Revise and update Wallace exhibits chart and organize and revise additional exhibits for class cert reply; begin assigning Exhibit numbers and redline Wallace Decl re same.	8.5	
5/17/2022	KES	Zoom meeting with co-counsel re class cert reply.	1.0	
5/17/2022	RB	Email KES and JSY re labor detail reports.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2022	RB	Redact BBK declaration exhibits.	0.6	
5/17/2022	RB	Review and organize filed pleadings.	0.2	
5/17/2022	RB	Review and finalize BBK declaration ISO class cert reply for filing.	1.8	
5/17/2022	RB	Compile deposition transcript excerpts for declaration exhibits.	2.0	
5/17/2022	RB	Review redactions and prepare chart for motion to seal.	1.4	
5/17/2022	RB	Prepare video exhibits to GBW declaration ISO class cert reply.	1.7	
5/17/2022	RB	Emails with GCG and team re motion to seal.	0.4	
5/18/2022	GCG	Review and revise reply brief.	2.0	
5/18/2022	GCG	Review and revise plaintiff's motion to seal.	2.0	
5/18/2022	GCG	Confs w/ BBK, AX and JSY and emails to KES and team re revisions to and cite checking of reply pleadings.	2.1	
5/18/2022	GCG	Meet w/ Schneider Wallace and BU to discuss final revisions to and cite-checking of reply pleadings.	0.6	
5/18/2022	GCG	Emails to GW and team re reply brief.	0.8	
5/18/2022	GCG	RBGG team meeting re reply pleadings.	0.5	
5/18/2022	GCG	Oversee finalizing of multiple reply pleadings.	0.5	
5/18/2022	GCG	Oversee cite check of reply and sealing pleadings.	0.5	
5/18/2022	JSY	Two team meetings re Reply and Motions to exclude and related pleadings.	0.8	
5/18/2022	JSY	Prepare and edit pleadings related to reply and motions to exclude; multiple emails and conf. with team re same.	13.5	
5/18/2022	BBK	Reviewing comm'ns re status of Mastin Reply Decl and revisions to Flores Reply Decl.	0.1	
5/18/2022	BBK	Conferring w/ RBGG team re priority tasks for reply.	0.2	
5/18/2022	BBK	PC w/ KES re motions to consider whether to seal Ds' materials.	0.2	
5/18/2022	BBK	Conferring w/ team re procedure for filing motions to consider whether to seal Ds' materials and proposed order.	0.3	
5/18/2022	BBK	Revising Motions to Consider whether to seal Ds' materials and proposed order ILO decision to split into two motions.	1.6	
5/18/2022	BBK	Conferring w/ RBGG team re review of Reply Brief and cite-check of Wallace Reply Decl.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 639

SERVICES

Date	Person	Description of Services	Hours	Discount
5/18/2022	BBK	Co-counsel meeting on Reply ISO Class Cert + post-meeting w/ RBGG team.	0.8	
5/18/2022	BBK	Attending to preparing supporting papers for Reply (including conferring w/ team re same).	1.1	
5/18/2022	BBK	Conducting legal cite check of motions to consider sealing Ds' materials.	0.2	
5/18/2022	BBK	Conducting fact/cite check and proof-read of Wallace Reply Brief.	3.4	
5/18/2022	BBK	Proof-reading and fact checking motion to seal Pls' materials and supporting papers.	0.3	
5/18/2022	BBK	Meeting w/ RBGG team re status of reply papers.	0.2	
5/18/2022	BBK	Revising Reply Brief to incorporate citations to evidence and ECF filings.	3.7	
5/18/2022	AX	Review and revise draft Reply brief and add factual citations.	7.5	
5/18/2022	AX	RBGG team meeting re Reply.	0.3	
5/18/2022	AX	Cocounsel meeting re Reply.	0.8	
5/18/2022	AX	Draft and revise pleadings re motions to seal, including discussions with GCG, JSY.	1.2	
5/18/2022	AX	Correspondence with team and other related tasks to filing.	1.5	
5/18/2022	BM	Cite check administrative motion to seal documents in support of class certification.	0.6	
5/18/2022	KES	Review, revise, update and compile unredacted version of Wallace reply exhibits, including splits for efiling; update index re exhibits to be filed under seal.	13.0	
5/18/2022	KES	Zoom meeting with co-counsel re class cert reply.	0.5	
5/18/2022	RB	Revise index of exhibits to BBK declaration to be filed under seal.	0.7	
5/18/2022	RB	Redact Cross declaration ISO class cert and finalize for filing.	0.9	
5/18/2022	RB	Revise exhibit to GBW declaration ISO class cert.	0.2	
5/18/2022	RB	Finalize Jones declaration ISO class cert reply.	0.2	
5/18/2022	RB	Finalize Flores declaration ISO class cert reply.	0.5	
5/18/2022	RB	Cite check GBW declaration ISO class cert reply.	3.8	
5/18/2022	RB	Draft appendix to admin motion to seal Defendants' material.	3.9	
5/19/2022	GCG	Review and revise reply brief.	1.3	
5/19/2022	GCG	Research and draft Wallace reply declaration.	1.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 640

SERVICES

Date	Person	Description of Services	Hours	Discount
5/19/2022	GCG	Review and analyze Kailes and Kennedy declarations.	0.4	
5/19/2022	GCG	Meet w/ SW and BU re finalizing reply pleadings and motions to exclude expert testimony.	0.5	
5/19/2022	GCG	Emails to DM re status of Belson and Schroyer declarations.	0.2	
5/19/2022	GCG	Confs w/ and emails to JSY, BBK, AX, RB, CG and KES re revisions to reply pleadings.	0.7	
5/19/2022	GCG	Conf w/ and email to GW re defendants' overdesignation of confidentiality and reply pleadings.	0.2	
5/19/2022	JSY	Prepare, edit, and finalize reply pleadings and pleadings re motions to exclude; multiple emails and conf. re same.	12.1	
5/19/2022	BBK	Working on reply papers and conferring w/ team and co-counsel re same.	0.9	
5/19/2022	BBK	Co-counsel meeting re Reply and Motions to Exclude.	0.3	
5/19/2022	BBK	Revising/finalizing Reply Brief (adding fact-cites, legal cite check, proof-reading, shortening).	8.4	
5/19/2022	BBK	Reviewing/revising motion to consider whether to seal Ds' materials for motion to exclude Ds' experts; conferring w/ co-counsel re same.	0.6	
5/19/2022	AX	Insert factual citations into draft of Reply brief and reconciling revisions.	2.5	
5/19/2022	AX	Meeting with cocounsel re Reply.	0.4	
5/19/2022	AX	Mark redactions in GBW declaration and related discussion with team.	1.5	
5/19/2022	AX	Legal cite check and related correspondence with team.	3.5	
5/19/2022	AX	Review finalized declarations, exhibits and related tasks to filing Reply.	4.0	
5/19/2022	KES	Revise and finalize Wallace reply exhibits; finalize and efile all reply papers and Administrative Motions to File Under Seal.	10.0	
5/19/2022	RB	Draft appendix to admin motion to seal Defendants' material.	1.2	
5/19/2022	RB	Correct exhibits to GBW declaration ISO class cert reply and email KES re same.	0.5	
5/19/2022	RB	Research negligence and wrongful death cases against Brookdale.	1.7	
5/19/2022	RB	Finalize declarations of Schroyer, Belson, Wallace, Kennedy, for filing.	1.0	
5/19/2022	RB	Revise appendix to motion to seal Defendant's materials and finalize for filing.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/19/2022	RB	Upload sealed documents to Sharefile link for opposing counsel.	0.6	
5/20/2022	GCG	Communication w/ JSY re post-filing tasks.	0.1	
5/20/2022	GCG	Review ECF notices.	0.1	
5/20/2022	JSY	Review final pleadings; quality control of same; conf. w/ KC and KS re same.	1.0	
5/20/2022	BBK	Reviewing/responding to GCG query re handling confidential document deletion per PO protocols post settlement or judgment.	0.2	
5/20/2022	BBK	Conferring w/ team re 5/19 Reply filing.	0.1	
5/20/2022	BBK	Conferring w/ daughter of former BD Windsor resident re filing of her declaration w/ reply.	0.1	
5/20/2022	BBK	Reviewing Pls' motions to exclude opinions of Ds' experts.	0.5	
5/20/2022	KES	Prepare manual filing of video reply exhibits and arrange for filing with court.	1.5	
5/20/2022	KES	Update pleadings file with sealed docs.	0.3	
5/23/2022	JSY	Emails with clients re reply filings.	0.4	
5/23/2022	JSY	Emails with AX re conflicts check.	0.1	
5/23/2022	JSY	Emails with CW re website update.	0.2	
5/23/2022	JSY	Call with GBW re request from Defs to schedule emergency conference.	0.1	
5/23/2022	JSY	Review Defs' admin motion; multiple emails re response to same; emails re same.	0.7	
5/23/2022	JSY	Emails re defense counsel emails re emergency status conference.	0.2	
5/23/2022	AX	Review team correspondence re Defs' emergency request for CMC.	0.2	
5/23/2022	AX	Review Defs' request for emergency CMC.	0.2	
5/23/2022	KES	Download and circulate pleading and calendar response deadline.	0.2	
5/24/2022	GCG	Conf w/ JSY and emails to team re defendants' "emergency request" and expert disclosures.	0.2	
5/24/2022	JSY	Conf. w/ GCG re expert disclosures.	0.1	
5/24/2022	JSY	Conf. w/ KES re declaration filing error; emails re same.	0.3	
5/24/2022	JSY	Emails re order from Judge G.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
5/24/2022	JSY	Emails re expert disclosures.	0.2	
5/24/2022	JSY	Emails re communications with clerk re filing issue.	0.1	
5/24/2022	JSY	Emails re error in Anderson motion to exclude.	0.1	
5/24/2022	KES	Update pleadings file.	0.7	
5/24/2022	KES	TC and emails with court clerk re filing error; confer JY re same; efile redacted version of Schroyer Decl.	1.7	
5/25/2022	JSY	Meeting with GBW, MTJ, BU, JT re expert disclosures.	0.5	
5/25/2022	JSY	Emails re expert disclosures.	0.1	
5/25/2022	JSY	Emails re errata.	0.2	
5/25/2022	BBK	Reviewing comm'ns w/ opposing counsel re intent to request emergency CMC and comm'ns w/ co-counsel re same.	0.1	
5/25/2022	BBK	Reviewing Ds' motion for emergency CMC and comm'ns w/ co-counsel re opposing same & Court Order denying same.	0.2	
5/25/2022	BBK	Reviewing comm'ns re filing redacted Reply Schroyer Decl and errata re Motion to Exclude certain opinions and testimony of Ds' ADA expert.	0.1	
5/25/2022	BBK	Reviewing JSY-co-counsel comm'ns re expert productions associated w/ Pls' reply expert decls.	0.1	
5/25/2022	BBK	Conferring w/ KES re receipt of video of 4/29 deposition of BD Folsom resident.	0.1	
5/25/2022	KES	Confer JY re errata exemplars.	0.2	
5/25/2022	KES	Download Toolen depo video.	0.1	
5/26/2022	JSY	Review letter re confidentiality designations; emails re same.	0.1	
5/26/2022	JSY	Emails and conf re Defs’ Opp to Motion to strike.	0.3	
5/26/2022	JSY	Review evidentiary objections filed Def.	0.2	
5/26/2022	BBK	Conferring w/ team re M. Johnson draft letter to opposing counsel re confidentiality designations.	0.1	
5/26/2022	BBK	Reviewing Ds' opposition to motion to strike supplemental Saad Declaration.	0.2	
5/26/2022	BBK	Conferring w/ co-counsel re: responding to Ds' opposition to motion to strike and objections to reply evidence.	0.1	
5/26/2022	KES	Download and circulate pleadings.	0.2	
5/27/2022	JSY	Emails re tasks moving forward.	0.4	
5/27/2022	JSY	Emails re Reply ISO motion to strike and evidentiary objections; review same.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 643

SERVICES

Date	Person	Description of Services	Hours	Discount
5/27/2022	BBK	Conferring w/ JSY and co-counsel re reply ISO motion to strike Supplemental Saad Declaration.	0.3	
5/27/2022	BBK	Reviewing Ds' Objections to Plaintiffs' Reply Evidence.	0.2	
5/27/2022	BBK	Conferring w/ JSY re Ds' Objections to Plaintiffs' Reply Evidence.	0.2	
5/27/2022	BBK	Reviewing Ds' Declaration justifying sealing/redaction of docs designated confidential in Reply and supporting papers.	0.2	
5/27/2022	BBK	Researching/drafting portion of reply ISO motion to strike supplemental saad declaration.	3.2	
5/30/2022	GCG	Review emails from GW - MJ - JSY regarding motion to strike supplemental Saad Declaration.	0.2	
5/31/2022	GCG	Conference with JSY re motion to strike reply strategy.	0.2	
5/31/2022	GCG	Emails GM-GW re Defendants' request to continue hearing.	0.1	
5/31/2022	GCG	Review Defendants' administrative motion.	0.2	
5/31/2022	GCG	Emails GW-team re Defendants' administrative motion and re reply brief due June 2.	0.2	
5/31/2022	GCG	Review and respond to JSY comments on plan for additional discovery and pleadings.	0.2	
5/31/2022	JSY	Meeting re Reply ISO motion to strike.	0.5	
5/31/2022	JSY	Conf. with GCG re current case tasks.	0.2	
5/31/2022	JSY	Draft and edit reply ISO motion to strike; emails re same.	3.5	
5/31/2022	JSY	Emails re admin motion filed by Defs and response deadline.	0.2	
5/31/2022	BBK	Reviewing JSY update re plan for Reply ISO Motion to Strike Supp Saad Declaration and conferring w/ team re same.	0.1	
5/31/2022	BBK	Reviewing G. Wallace - G. Maatman comm'ns re: Ds' request to stipulation to indefinitely continue class cert hearing and comm'ns w/ co-counsel re same.	0.1	
5/31/2022	BBK	Reviewing Ds' Admin Motion for Indefinite Continuance of Class Cert Hearing.	0.1	
5/31/2022	BBK	Reviewing JSY draft Reply ISO Motion to Strike Supp Saad Decl incorporating GW and BBK inserts.	0.2	
5/31/2022	AX	Meeting with MJ, GBW, JSY, RS re Brookdale filings.	0.5	
5/31/2022	AX	Review correspondence with team and opposing counsel.	0.5	
5/31/2022	AX	Review filings.	0.5	
5/31/2022	KES	Download and circulate motion and calendar response deadline.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/1/2022	GCG	Review court order re reply objections.	0.1	
6/1/2022	GCG	Conf w/ AX and email to GW, MJ and JY re response to same.	0.2	
6/1/2022	GCG	Conf w/ BBK re defendants' evidentiary objections.	0.2	
6/1/2022	JSY	Emails re status of various filings and order requiring response to evidentiary objections.	0.3	
6/1/2022	BBK	Reviewing M. Johnson and AX revisions to Reply ISO Motion to Strike Supp Saad Decl & comm'ns w/ co-counsel re finalizing/filing same.	0.5	
6/1/2022	BBK	Reviewing Court Order directing Pls to file response to Ds' objections to reply evidence by 6/2; conferring w/ co-counsel re drafting same.	0.2	
6/1/2022	AX	Email correspondence with team re reply iso motion to exclude saad, response to objections to pls' reply, and response to Brookdale's motion to continue hearing.	0.6	
6/1/2022	AX	Draft, revise, and research Reply ISO Motion to Exclude Saad Declaration.	5.6	
6/1/2022	AX	Review case filings.	1.0	
6/2/2022	GCG	Review and revise draft reply ISO motion to strike supplemental Saad Decl.	0.5	
6/2/2022	GCG	Conf w/ and email to AX re revisions to and filing of same.	0.2	
6/2/2022	GCG	Review and revise plaintiffs' brief re objections to reply evidence.	0.4	
6/2/2022	GCG	Emails to GW and team re revisions to same.	0.2	
6/2/2022	GCG	Review multiple filings by defendants related to emergency motion, sealing and motions to strike.	0.5	
6/2/2022	GCG	Email to BBK re response to motion to strike.	0.1	
6/2/2022	JSY	Emails re filings by defendants and responses.	0.3	
6/2/2022	BBK	Conferring w/ team re finalizing/filing Reply ISO Motion to Strike Supp Saad Decl.	0.2	
6/2/2022	BBK	Reviewing draft response to Ds' Objections to Reply Evidence and proposed revisions thereto; comm'ns w/ co-counsel re same.	0.5	
6/2/2022	BBK	Reviewing notices of e-filing of untimely objections to Pls' request for judicial notice and reply attorney decls and conferring w/ RBGG team re same.	0.1	
6/2/2022	BBK	Conferring w/ P. Lindstrom re class cert hearing.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/2/2022	BBK	Conferring w/ RBGG team and co-counsel re meeting on 6/3 to plan response to Ds' 6/2 filings.	0.1	
6/2/2022	BBK	Reviewing final Reply ISO Motion to Strike Supp Saad Decl.	0.2	
6/2/2022	BBK	Reviewing final Response to Ds' Objections to Reply Evidence.	0.2	
6/2/2022	BBK	Reviewing Ds' Opposition to Request for Judicial Notice.	0.1	
6/2/2022	BBK	Reviewing Ds' untimely Motion to Strike Reply Attorney Declarations.	0.2	
6/2/2022	BBK	Reviewing Ds' Opps to Motions to Strike Portions of Opinions/Testimony of Ds' Experts.	0.3	
6/2/2022	BBK	Conferring w/ JSY and AX re addressing Ds' untimely 6/2 filings objecting to Pls' reply evidence.	0.1	
6/2/2022	BBK	Emailing w/ MLF/PG and RBGG Brookdale team re responding to objections to attorney declarations as being argumentative or lack of personal knowledge.	0.1	
6/3/2022	GCG	Review defendants' motion to strike and opp to RJN.	0.2	
6/3/2022	GCG	Meet w/ co-counsel re five pleadings due soon and plan for oral argument.	0.7	
6/3/2022	GCG	Emails to JSY, AX and BBK and conf w/ KES re same and re preparation for oral argument.	0.2	
6/3/2022	JSY	Emails re responses to Defs’ filing and updated task list.	0.2	
6/3/2022	BBK	Conferring w/ MLF/PG/GCG re responding to objections to attorney declarations.	0.1	
6/3/2022	BBK	Drafting/sending proposal to GCG and AX re plan for responding to Ds' 6/2 filings.	0.2	
6/3/2022	BBK	Meeting w/ co-counsel re responding to Ds' 6/2 filings.	0.5	
6/3/2022	BBK	Conferring w/ RBGG team re drafting responses to Ds' Opposition to RJN and to Ds' Motion to Strike Attorney Declarations.	0.2	
6/3/2022	BBK	Planning/outlining/researching Reply ISO RJN.	1.7	
6/3/2022	BBK	Reviewing AX updated RBGG to-do list for case tasks.	0.1	
6/3/2022	AX	Email correspondence with team re data elements.	0.1	
6/3/2022	AX	Brookdale cocounsel meeting.	0.5	
6/3/2022	AX	Email correspondence with team re case tasks.	0.4	
6/3/2022	AX	Circulate notes from cocounsel meeting and case task list.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 646

SERVICES

Date	Person	Description of Services	Hours	Discount
6/6/2022	GCG	Conf w/ JSY and emails to team re revisions to opp to motion to delay class cert hearing.	0.2	
6/6/2022	JSY	Call with GCG re status of Opp. re admin mtn to continue hearing.	0.1	
6/6/2022	JSY	Call with AX re Opp to Motion to Continue Hearing.	0.1	
6/6/2022	JSY	Edit Opp. to Motion to Continue; multiple emails re same.	2.0	
6/6/2022	BBK	Reviewing GW draft opposition to administrative motion to continue class cert hearing and MJ and JSY comments thereon.	0.2	
6/6/2022	BBK	Conferring w/ JSY re drafting inserts for opposition to administrative motion to continue class cert hearing.	0.1	
6/6/2022	BBK	Drafting insert for opposition to administrative motion to continue class cert hearing.	1.2	
6/6/2022	BBK	Conducting legal research for Reply ISO RJN.	1.0	
6/6/2022	AX	Email correspondence w/ team re case tasks.	0.2	
6/6/2022	AX	Draft paragraph re Opposition to Motion to Strike Attorney Declaration for motion for continuance.	0.5	
6/6/2022	AX	Draft Opposition to Motion to Strike Attorney Declaration.	0.5	
6/7/2022	GCG	Prepare for and conduct meeting w/ co-counsel re oral argument; preparation and various briefs due this week and next.	0.8	
6/7/2022	GCG	Follow up emails re meet and confer w/ defendants and revisions to briefs.	0.3	
6/7/2022	JSY	Team meeting re upcoming filings and prep for hearing.	1.1	
6/7/2022	JSY	Research re class cert orders from Judge Gilliam.	1.3	
6/7/2022	BBK	Meeting w/ co-counsel and RBGG team re upcoming filings & class cert hearing.	0.9	
6/7/2022	BBK	Conducting legal research for Reply ISO Request for Judicial Notice.	1.8	
6/7/2022	BBK	Drafting Reply ISO Request for Judicial Notice.	5.8	
6/7/2022	BBK	Reviewing Ds' response re Pls' M&C request on over-designations of material as confidential under PO; conferring w/ co-counsel re same.	0.1	
6/7/2022	AX	Brookdale meeting with cocounsel re motions, class cert issues.	0.9	
6/7/2022	AX	Follow up email correspondence from meeting and circulate notes from meeting.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 647

SERVICES

Date	Person	Description of Services	Hours	Discount
6/7/2022	RB	Circulate research re negligence cases against Brookdale.	0.1	
6/8/2022	GCG	Emails to GW and team re defendants' request for further continuance, revisions to briefs and communications w/ named plaintiffs.	0.2	
6/8/2022	GCG	Review BBK draft reply ISO judicial notice.	0.1	
6/8/2022	JSY	Review and edit Reply ISO RJN.	0.4	
6/8/2022	JSY	Emails re hearing date change and moot.	0.3	
6/8/2022	JSY	Emails re Replies ISO motions to exclude.	0.1	
6/8/2022	BBK	Reviewing court order continuing class cert hearing; conferring w/ co-counsel re same.	0.1	
6/8/2022	BBK	Reviewing/responding to MJ query re Ds' position on sealing reply materials and whether court has ruled on same.	0.2	
6/8/2022	BBK	Conferring w/ team re Ds' request to further continue class cert hearing; reviewing G. Wallace comm'ns w/ E. Rutner re same.	0.1	
6/8/2022	BBK	Conferring w/ JSY re reviewing draft Reply ISO RJN.	0.1	
6/8/2022	BBK	Revising draft Reply ISO RJN per JSY comments.	1.3	
6/8/2022	BBK	Conferring w/ co-counsel re draft Reply ISO RJN.	0.1	
6/8/2022	BBK	(Billing Judgment) reviewing/responding to GCG query re recent verdict against Atria Senior Living for denial of sign language interpretation services to assisted living residents.	0.0	0.1
6/8/2022	BBK	Conferring w/ team re moot argument for class cert hearing.	0.2	
6/8/2022	BBK	Conferring w/ team re plan for filing opposition to motion to strike reply attorney declarations & to finalize replies in support of motions to exclude Ds' expert opinions/testimony.	0.1	
6/8/2022	BBK	Conferring w/ team re Ds' improperly filed admin motion to seal opposition to class cert.	0.1	
6/8/2022	BBK	Comm'ns w/ named Pls re continuance of class cert hearing.	0.2	
6/8/2022	BBK	Further revisions to Reply ISO RJN per co-counsel comments.	0.6	
6/8/2022	BBK	Conferring w/ RBGG team re cite-checking and fact-checking Reply ISO RJN per co-counsel comments.	0.1	
6/8/2022	AX	Review team correspondence re case tasks and class certification hearings.	0.3	
6/8/2022	AX	Correspondence with team re Opposition to Motion to Strike Attorney Declarations.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/8/2022	AX	Draft Opposition.	0.2	
6/8/2022	AX	Review draft of RJN reply.	0.2	
6/9/2022	GCG	Conf w/ and emails to JSY re RJN reply brief and defendants' motion to continue hearing.	0.2	
6/9/2022	GCG	Emails to GW and team re same and re Saad reply.	0.1	
6/9/2022	GCG	Review stipulation re continuance of hearing.	0.1	
6/9/2022	JSY	Emails with clients re hearing date.	0.2	
6/9/2022	JSY	Emails re Defendants' extension request and filings.	0.3	
6/9/2022	JSY	Emails re Reply filings.	0.2	
6/9/2022	BBK	Conferring w/ B. Umpierre and R. Steyer re citations to Ds' under seal filings for Reply ISO Motion to Exclude Expert Opinions.	0.3	
6/9/2022	BBK	Conferring w/ co-counsel re addressing Ds' follow-up request for further continuance to class cert hearing.	0.1	
6/9/2022	BBK	Reviewing Ds' Admin Motion to Continue Class Cert Hearing and Ds' Notice of Withdrawal of same.	0.1	
6/9/2022	BBK	Conducting legal and fact cite-check and proof read for Reply ISO Request for Judicial Notice.	1.6	
6/9/2022	BBK	Comms. re finalizing and filing Reply ISO RJN.	0.2	
6/9/2022	BBK	Reviewing Reply ISO Motion to Exclude Opinions of Ds' ADA Expert Anderson.	0.4	
6/9/2022	BBK	Reviewing stipulation to continue class cert hearing from 6/30 to 7/7 and comm'ns w/ team re same.	0.1	
6/9/2022	BBK	Reviewing Reply ISO Motion to Exclude Opinions of Ds' Staffing/Damages Experts Saad and Jacobson.	0.3	
6/9/2022	KES	Efile RJN reply and confer team re same.	0.4	
6/9/2022	KES	Download and circulate pleadings.	0.2	
6/10/2022	GCG	Emails to JSY and team re motion to advance hearing date.	0.1	
6/10/2022	JSY	Emails re sealing filing.	0.1	
6/10/2022	JSY	Emails re accelerating hearing dates.	0.3	
6/10/2022	JSY	Research re prior class cert orders; draft memo re same.	1.2	
6/10/2022	BBK	Reviewing JSY email to Ds seeking stipulation to advance hearing date on Pls' motions to exclude expert testimony and to strike supp Saad decl.	0.1	
6/12/2022	GCG	Review expert invoices and emails.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/13/2022	GCG	Review court order moving hearing date.	0.1	
6/13/2022	GCG	Emails to clients and outside experts re same.	0.1	
6/13/2022	GCG	Emails to BBK, JSY and MJ re need for declarant files.	0.1	
6/13/2022	JSY	Emails re resident files issue.	0.2	
6/13/2022	JSY	Emails re hearing date and order.	0.2	
6/13/2022	JSY	Emails with clients re hearing date.	0.2	
6/13/2022	JSY	Emails with Defs re accelerating hearing dates on Daubert motions and motion to strike and draft stipulation re same.	1.0	
6/13/2022	JSY	Draft memo re other class cert orders.	1.0	
6/13/2022	JSY	Emails with Defs re stipulation.	0.1	
6/13/2022	BBK	Reviewing M&C email from opposing counsel re Ds' position on confidentiality designations for expert deposition transcripts.	0.1	
6/13/2022	BBK	Conferring w/ RS re outreach to reply declarant re making request for her mother's resident files.	0.2	
6/13/2022	BBK	Conferring w/ RBGG team re timing of requests for resident files to Brookdale.	0.1	
6/13/2022	BBK	Conferring w/ co-counsel re timing of requests for resident files to Brookdale in relation to class cert hearing.	0.3	
6/13/2022	BBK	Reviewing court order granting stipulated continuance of class cert hearing to 7/7; conferring w/ team re same.	0.1	
6/13/2022	BBK	Outreach to named Plaintiffs re further continuance of class cert hearing.	0.1	
6/13/2022	BBK	Conferring w/ team re Ds' agreement to stipulate to advance hearing date for Pls' Motions re Ds' Experts; reviewing JSY draft stipulation and Ds' proposed revisions to same.	0.2	
6/13/2022	AX	Review email correspondence with team re stipulation.	0.1	
6/14/2022	GCG	Email witness re hearing.	0.1	
6/14/2022	GCG	Emails to GW, JSY and team re preparation for oral argument and stipulation w/ defendants re hearing.	0.4	
6/14/2022	JSY	Emails with sealing issues with expert depositions.	0.1	
6/14/2022	JSY	Finalize and file stip re hearing date; multiple emails re changing hearing date.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/14/2022	BBK	Conferring w/ co-counsel/RBGG team re Ds' request to stipulate to advance hearing date for motion to strike reply attorney declarations; reviewing/commenting on revised stipulation re same.	0.2	
6/14/2022	BBK	Reviewing Court Order re-setting class certification hearing for 7/8; conferring w/ co-counsel re resetting moot oral argument to 6/30.	0.1	
6/14/2022	AX	Research and draft Opposition to Motion to Strike Attorney declarations.	2.5	
6/15/2022	GCG	Email to GW re overall strategy and approach.	0.1	
6/15/2022	GCG	Review and comment on draft brief opposing motion to strike atty declarations.	0.3	
6/15/2022	GCG	Conf w/ JSY and email AX re same.	0.1	
6/15/2022	GCG	Attend to informing plaintiffs and witnesses of new hearing date.	0.1	
6/15/2022	JSY	Emails and conf. re sealing issues with depositions.	0.2	
6/15/2022	JSY	Review and edit Opp. brief re Motion to Strike attorney declarations.	1.0	
6/15/2022	JSY	Emails and conf. re edits to Opp. brief re motion to strike attorney declarations.	0.4	
6/15/2022	BBK	Reviewing AX draft Opposition to Motion to Strike Reply Attorney Declarations and JSY/GCG/co-counsel comments thereon.	0.3	
6/15/2022	BBK	Updating H & R Carlson and P Lindstrom re court order moving class cert hearing from 7/7 to 7/8.	0.1	
6/15/2022	BBK	Reviewing co-counsel comm'ns re responding to overly broad confidentiality designations of expert depo transcripts and materials & e-mails w/ opposing counsel re same.	0.2	
6/15/2022	AX	Revise Opposition to Motion to Strike declarations and related correspondence with team (1); additional research re opposition (1.5).	2.5	
6/16/2022	JSY	Emails re hearing date.	0.2	
6/16/2022	JSY	Conf. and emails re Opp to Motion to Strike filing.	0.3	
6/16/2022	BBK	Drafting/sending proposed revisions to AX's draft Opposition to Motion to Strike Reply Attorney Declarations.	0.5	
6/16/2022	BBK	Conferring w/ AX and co-counsel re case law for Opposition to Motion to Strike Reply Attorney Declarations.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 651

SERVICES

Date	Person	Description of Services	Hours	Discount
6/16/2022	BBK	Reviewing Ds' decl ISO admin motion to seal materials designated confidential by Ds and filed w/ Reply ISO Motion to Exclude Expert Opinions of Jacobson and Saad.	0.1	
6/16/2022	AX	Email correspondence re Opposition to Motion to Strike Attorney Declarations.	0.7	
6/16/2022	AX	Cite check.	1.5	
6/16/2022	AX	Finalize and file.	0.8	
6/17/2022	BBK	Reviewing Ds' meet and confer letter re Pls' responses to 2d Set of RFPs and re expert submissions.	0.1	
6/21/2022	JSY	Emails re sealing issues.	0.2	
6/21/2022	JSY	Work on memo re class cert orders.	0.1	
6/21/2022	JSY	Emails re call re discovery issues.	0.1	
6/21/2022	BBK	Reviewing co-counsel comm'ns re supp expert productions IRT Ds' M&C letter.	0.1	
6/21/2022	AX	Email correspondence with team re sealed filings.	0.5	
6/21/2022	AX	Call with putative class member re update on case.	0.3	
6/21/2022	AX	Email correspondence w/ team re update on same.	0.2	
6/22/2022	GCG	Confs w/ JSY and emails to MJ and team re defendants' objections to discovery responses.	0.2	
6/22/2022	JSY	Call with co counsel re meet and confer issues with defendants.	0.5	
6/22/2022	JSY	Email team re call with co counsel.	0.2	
6/22/2022	BBK	Reviewing JSY report re meeting w/ co-counsel on addressing Ds' 6/17 meet and confer letter re Pls' response to 2d Set of RFPs and re expert disclosures.	0.1	
6/23/2022	GCG	Emails with GW - team regarding preparation for oral argument.	0.1	
6/23/2022	GCG	Review court order regarding oral argument.	0.1	
6/23/2022	JSY	Emails re discovery meet and confer.	0.1	
6/23/2022	JSY	Emails re prep for hearing.	0.2	
6/23/2022	JSY	Edit memo re class cert orders.	0.3	
6/23/2022	JSY	Emails re order re hearing.	0.1	
6/23/2022	JSY	Review Defs' Reply ISO motion to strike.	0.1	
6/23/2022	BBK	Reviewing comm'ns w/ co-counsel re evidence of resident payments rec'd by BD Corporate.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/23/2022	BBK	Conferring w/ team re class cert hearing preparation assignments.	0.2	
6/23/2022	BBK	Reviewing Ds' Reply ISO Motion to Strike Atty Decls and Court Order re Arguing Attys; conferring w/ RBGG team re same.	0.2	
6/23/2022	AX	Email correspondence with team re preparing materials for GW re facts for class certification hearing/moot.	0.4	
6/23/2022	KES	Download and circulate pleadings.	0.2	
6/24/2022	GCG	Emails with JSY - KS - team regarding preparation for oral argument.	0.2	
6/24/2022	JSY	Emails re meet and confer time.	0.1	
6/24/2022	BBK	Reviewing M. Johnson and T. Close class cert hearing prep memo re undisputed facts on ADA issues.	0.1	
6/24/2022	BBK	Reviewing JSY - M. Jacobsen comm'ns re meeting and conferring on Ps' responses to RFPs; comm'ns w/ co-counsel re same.	0.1	
6/26/2022	JSY	Draft class cert prep memo.	1.8	
6/26/2022	AX	Draft memo re undisputed facts for Brookdale class cert moot preparation.	3.0	
6/27/2022	GCG	Review and revise memorandum regarding moot preparation for oral argument.	0.5	
6/27/2022	GCG	Conferences with JSY and emails with AX- BBK regarding same and regarding memo regarding undisputed facts.	0.3	
6/27/2022	JSY	Call with AX re memos re oral argument prep.	0.2	
6/27/2022	JSY	Review and edit memo re undisputed facts; emails re same.	0.3	
6/27/2022	JSY	Emails re edits to argument prep memo.	0.2	
6/27/2022	BBK	Reviewing/revising AX draft memo re facts not in dispute/conceded by Ds.	0.8	
6/27/2022	BBK	Reviewing/revising JSY draft moot questions for class cert hearing.	1.8	
6/27/2022	AX	Revise Brookdale undisputed facts memo and send to team.	0.5	
6/27/2022	AX	Review and add to Brookdale memo re moot questions and class cert decisions.	1.5	
6/27/2022	AX	Communication with team re case tasks.	0.1	
6/28/2022	GCG	Conference and emails with JSY - GW regarding preparation for oral argument.	0.2	
6/28/2022	JSY	Edit hearing prep memo; emails re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/28/2022	JSY	Emails re barrier list project.	0.1	
6/28/2022	JSY	M+C call with Defs re RFP Set 2.	0.5	
6/28/2022	JSY	Conf. w/ BBK and AX re M+C call with Defs; draft email to team re same.	0.9	
6/28/2022	JSY	Conf. w/ GCG re research projects.	0.1	
6/28/2022	BBK	Reviewing updated questions for moot class cert hearing w/ AX and GCG additions.	0.1	
6/28/2022	BBK	Conferring w/ JSY re plan for M&C w/ Ds on Pls' responses to 2d Set of RFPs.	0.1	
6/28/2022	BBK	Reviewing JSY report to team re M&C w/ Ds on Pls' responses to 2d Set of RFPs.	0.1	
6/29/2022	GCG	Prepare for moot.	0.1	
6/29/2022	JSY	Call with MTJ re M+C with Defs.	0.4	
6/29/2022	JSY	(Billing Judgment) Conf. w/ ID re research re statutes in other states; emails re same.	0.0	0.8
6/29/2022	JSY	Emails re Heredia and Navarez cases.	0.1	
6/29/2022	BBK	Reviewing/responding to JSY update re legal research for potential MSJ and settlement negotiations on Unruh Act and ADA.	0.1	
6/29/2022	BBK	Reviewing meet and confer emails re Ds' request for additional expert productions.	0.1	
6/29/2022	BBK	Reviewing KES-RSteyer comm'ns re contact from daughter of putative class member.	0.1	
6/29/2022	IVD	(Billing Judgment) Meet with Jenny re Brookdale assignment to find analog unruh statute in other states (.5) Read Brookdale complaint (1.5).	0.0	2.0
6/30/2022	GCG	Prepare for and conduct oral argument moot.	1.5	
6/30/2022	GCG	Follow up email to GW re same.	0.2	
6/30/2022	GCG	Conf w/ and email to JSY re same.	0.2	
6/30/2022	JSY	Moot of oral argument for class cert motion and conf. re same.	2.0	
6/30/2022	JSY	Prep for moot.	0.3	
6/30/2022	BBK	Conferring w/ RBGG BD team re plan for moot OA.	0.2	
6/30/2022	BBK	Moot oral argument for class cert hearing.	1.9	
6/30/2022	BBK	Conferring w/ JSY and AX re takeaways from moot oral argument for class cert hearing.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/30/2022	AX	Prepare for Brookdale moot argument.	0.7	
6/30/2022	AX	Pre meeting with JSY, BBK, GCG.	0.3	
6/30/2022	AX	Attend Brookdale moot argument.	2.0	
6/30/2022	IVD	Began researching state laws comparable to Unruh.	2.3	
7/1/2022	GCG	Conf w/ and emails to JSY and email to GW re preparation for oral argument.	0.2	
7/1/2022	JSY	Emails re contact with witness.	0.2	
7/1/2022	JSY	Conf. w/ GCG re class cert hearing prep.	0.1	
7/1/2022	JSY	Review pleadings in Navarez and Heredia; draft emails re same.	2.0	
7/1/2022	IVD	Research statutes in other cases that are similar to CA's unruh act.	2.0	
7/3/2022	GCG	Prepare for oral argument.	0.4	
7/3/2022	GCG	Email GW re same.	0.1	
7/4/2022	GCG	Prepare for oral argument.	0.2	
7/4/2022	GCG	Email to MJ re same.	0.1	
7/5/2022	GCG	Prepare for oral argument.	0.2	
7/5/2022	GCG	Emails to GW and team re same.	0.1	
7/5/2022	BBK	Conferring w/ RBGG team and co-counsel re prep for class cert hearing.	0.1	
7/5/2022	BBK	Reviewing comm'ns w/ opposing counsel re failure to serve unredacted Opposition to Class Cert on Pls.	0.1	
7/5/2022	BBK	Reviewing M Johnson report on 7/4 meet and confer w/ Ds re request for supplemental expert disclosure in advance of class cert hearing.	0.1	
7/5/2022	KES	Review class cert chart detailing Defs exhibits and tc M. Johnson re sealed docs and docs removed from docket.	1.0	
7/5/2022	IVD	Research statutes from other states that are similar to CA's Unruh Act.	2.0	
7/6/2022	GCG	Revise summary of issues faced by class representatives for use at oral argument.	0.3	
7/6/2022	GCG	Conf w/ AX and emails to GW and team re same.	0.2	
7/6/2022	GCG	Conf w/ KES re oral argument.	0.1	
7/6/2022	BBK	Conferring w/ RBGG team re providing examples from named Pls for class cert hearing.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/6/2022	BBK	Reviewing and drafting additions to AX write-ups of examples from named Pls' declarations.	0.4	
7/6/2022	IVD	Research statutes in other states that are similar to CA's Unruh Act.	6.4	
7/7/2022	GCG	Prepare for oral argument.	1.1	
7/7/2022	GCG	Conf w/ and emails to GW and team re same and re potential demonstratives.	0.5	
7/7/2022	GCG	Confs w/ AX and KES re oral argument preparation.	0.3	
7/7/2022	IVD	Researched statutes from different states that are similar to CA's Unruh Act.	5.2	
7/7/2022	IVD	Sent check in email to AX about progress.	0.1	
7/8/2022	GCG	(Reduced Charge) Travel to prepare for and participate in hearing on plaintiffs' motion for class certification and related motions.	0.5	0.5
7/8/2022	GCG	Follow up meeting w/ client, witnesses and co-counsel re next steps.	0.5	
7/8/2022	GCG	Attend to transcript order.	0.2	
7/8/2022	GCG	Conf w/ JSY and KES and email to team re summary of hearing.	0.5	
7/8/2022	GCG	Prepare for and participate in hearing on plaintiffs' motion for class certification and related motions.	2.0	
7/8/2022	JSY	Conf. w/ GCG re hearing.	0.2	
7/8/2022	JSY	Emails re class cert hearing.	0.3	
7/8/2022	SJR	Review emails re class cert hearing.	0.1	
7/8/2022	BBK	Reviewing AX and GCG reports re class cert hearing; conferring w/ RBGG team re same.	0.3	
7/8/2022	AX	(Reduced Charge) Travel to and from Oakland for class certification hearing.	0.9	0.9
7/8/2022	AX	Attend class certification hearing and take notes.	1.5	
7/8/2022	AX	Confer with co-counsel re hearing and next steps.	0.5	
7/8/2022	AX	Draft summary email to team and confer re same.	0.8	
7/8/2022	AX	Check in with summer associate re Brookdale research project.	0.4	
7/8/2022	KES	Prepare and efile transcript order form.	0.3	
7/8/2022	KES	Review emails summarizing oral argument.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 656

SERVICES

Date	Person	Description of Services	Hours	Discount
7/8/2022	IVD	Researched statutes from different states that are similar to CA's Unruh Act.	2.0	
7/8/2022	IVD	Meeting with AX regarding this assignment.	0.3	
7/9/2022	GCG	Email w/ MH re oral argument and follow up.	0.1	
7/11/2022	GCG	Review court order re sealing issues.	0.1	
7/11/2022	GCG	Conf w/ AX and emails to GW, MJ, BBK, JSY and AX re same and re follow up needed.	0.2	
7/11/2022	GCG	Email to GM and MJ re process server and A. Saad.	0.1	
7/11/2022	GCG	Conf w/ MWB re oral argument issues.	0.1	
7/11/2022	GCG	Conf w/ MH re understaffing at Fountaingrove.	0.3	
7/11/2022	JSY	Review order re sealing; multiple emails with team re same.	0.5	
7/11/2022	BBK	Reviewing/conferring w/ RBGG team re Court Order on filing consolidated joint motion to seal and proposed order.	0.2	
7/11/2022	BBK	Reviewing JSY comm'ns w/ co-counsel re strategy for meet and confer w/ Ds on consolidated joint sealing motion pursuant to Court Order; conferring w/ RBGG team re same.	0.2	
7/11/2022	AX	Email correspondence with team re sealing issues.	0.4	
7/11/2022	AX	Draft memo re sealing motions and related review of docket.	1.0	
7/11/2022	AX	Review correspondence re case issues.	0.1	
7/11/2022	IVD	Finish researching other state's statute that are similar to CA's Unruh Act.	2.5	
7/11/2022	IVD	Review each state's findings. Conducted additional research for some states.	2.0	
7/12/2022	GCG	Communications w/ team re approach to defendants' sealing motion.	0.2	
7/12/2022	JSY	Call with co-counsel re sealing motion.	1.0	
7/12/2022	JSY	Call with AX re sealing motion issues.	0.1	
7/12/2022	JSY	Emails re sealing issues; review AX memo re same.	0.3	
7/12/2022	JSY	Emails re call with co-counsel re sealing issues.	0.1	
7/12/2022	BBK	Reviewing AX memo re status of pending sealing motions in prep for M&C w/ Ds re same.	0.1	
7/12/2022	BBK	Reviewing comm'ns w/ co-counsel re plan for meet and confer on consolidated joint sealing motion pursuant to court order and JSY report re same.	0.2	
7/12/2022	AX	Call with MJ, JSY re sealing issues.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 657

SERVICES

Date	Person	Description of Services	Hours	Discount
7/12/2022	AX	Call with JSY re same.	0.1	
7/12/2022	AX	Email correspondence with GBW, MJ, JSY re sealing issues.	0.6	
7/12/2022	AX	Review ID memo re Unruh Act analogs and related email correspondence.	0.2	
7/12/2022	AX	Draft memo re sealing motions and send to team.	1.3	
7/12/2022	IVD	Finished reviewing statutes from different states that determined the mechanism for relief and/or availability of damages.	2.0	
7/12/2022	IVD	Organized the Excel sheet based on similarity to the CA statute and the number of Brookdale facilities per state.	0.5	
7/12/2022	IVD	Finished collecting PDF's for all statutes and uploaded them into a DMS folder.	0.5	
7/13/2022	GCG	Conf w/ and emails to GW re sealing project, over-designation by defendant, and potential motion for summary judgment.	0.8	
7/13/2022	GCG	Conf w/ JSY and AX and emails to BBK and team re plan for complying w/ court orders re sealing.	0.8	
7/13/2022	JSY	Meet and confer call with Defs re sealing filing.	0.5	
7/13/2022	JSY	Multiple calls with GCG and AX re sealing filing issues.	1.0	
7/13/2022	JSY	Review memo from ID re Unruh Act-like statutes in other states; emails to team re same.	0.3	
7/13/2022	JSY	Prepare for meet and confer with Defs and review various sealing motions and orders; emails with team re same.	1.8	
7/13/2022	BBK	Reviewing AX report on 7/13 meet and confer w/ Ds re joint consolidated sealing motion and proposed order.	0.1	
7/13/2022	BBK	Reviewing JSY-ID comm'ns re legal research on state disability laws in other states w/ 10+ BD facilities for potential settlement negotiations.	0.1	
7/13/2022	BBK	Reviewing JSY-co-counsel comm'ns re plan for drafting Pls' portions of joint consolidated sealing motion and proposed order.	0.2	
7/13/2022	BBK	Conferring w/ RBGG team re opposing Ds' motions to seal docs that do not meet the legal standard.	0.3	
7/13/2022	AX	Email correspondence with JSY, MJ re M&C.	0.2	
7/13/2022	AX	M&C with Defs re joint sealing motion.	0.4	
7/13/2022	AX	Call with JSY re same.	0.1	
7/13/2022	AX	Draft email to team.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 658

SERVICES

Date	Person	Description of Services	Hours	Discount
7/13/2022	AX	Phone calls with JSY and GCG re sealing issues.	0.6	
7/13/2022	AX	Email correspondence with team re sealing issues.	0.5	
7/13/2022	AX	Update memo re sealing issues.	1.5	
7/14/2022	GCG	Conf w/ JSY and email from MJ re sealing motion and overdesignation.	0.3	
7/14/2022	GCG	Legal research re same.	0.1	
7/14/2022	JSY	Call with GCG re sealing issues and GCG conf. w/ GW re same.	0.2	
7/14/2022	JSY	Review sealing order; multiple emails re same.	0.5	
7/14/2022	BBK	Reviewing JSY and AX emails re impact of Court's 3/30 order on sealing motion on Pls' objections to Ds' requests to seal in consolidated sealing motion.	0.1	
7/14/2022	AX	Email correspondence to team re sealing motion and related issues and review of same.	0.4	
7/14/2022	KES	Follow up re barrier list sorting issue.	0.2	
7/15/2022	GCG	Research and draft memo to team re sealing case law.	0.5	
7/15/2022	GCG	Review JM proposed brief and order re sealing.	0.2	
7/15/2022	GCG	Email to JSY and team re sealing brief.	0.1	
7/15/2022	JSY	Emails re sealing pleadings and plan for same.	0.5	
7/15/2022	BBK	Reviewing JSY/AX/GCG/MJ comm'ns re preparing Pls' portions of consolidated motion to seal.	0.1	
7/15/2022	AX	Email correspondence with JSY and team re joint sealing motion (.2); review Defs' drafts of administrative motion and proposed order (.2).	0.4	
7/18/2022	JSY	Meeting with AX and KES re sealing filing.	0.5	
7/18/2022	JSY	Emails with Defendants re sealing filing.	0.1	
7/18/2022	JSY	Review sealing filing memos; emails re same.	0.8	
7/18/2022	JSY	Emails re sealing issues.	0.1	
7/18/2022	AX	Meeting with KES, JSY re joint Brookdale sealing motion and proposed order.	0.7	
7/18/2022	AX	Review team correspondence and memos re sealing motion.	0.7	
7/19/2022	JSY	Call with AX re sealing filing.	0.2	
7/19/2022	JSY	Call with GCG re sealing filing.	0.2	
7/19/2022	JSY	Team meeting re sealing filing.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/19/2022	JSY	Draft documents re sealing.	0.8	
7/19/2022	JSY	Review sealing memos.	0.5	
7/19/2022	AX	Meeting with cocounsel re sealing motion.	0.5	
7/19/2022	AX	Review and circulate notes to team re issues for sealing motion.	0.3	
7/19/2022	KES	Team meeting re sealing motion.	0.5	
7/19/2022	KES	Emails with court reporter re status of hearing transcript.	0.2	
7/19/2022	KES	Revise draft proposed order with items to be sealed per BBK Reply Decl.	0.5	
7/20/2022	JSY	Draft sealing statements; emails re sealing filing.	0.9	
7/20/2022	BBK	Reviewing emails re preparing Pls' portion of combined joint sealing motion.	0.1	
7/20/2022	AX	Email correspondence with team re joint sealing motion.	0.3	
7/20/2022	AX	Review summary memos and draft pls' section of joint sealing brief.	2.0	
7/20/2022	KES	Revise draft proposed order.	0.1	
7/21/2022	JSY	Call with AX re sealing motion.	0.2	
7/21/2022	JSY	Draft pleadings re joint sealing motion; multiple emails and conf. re same.	6.3	
7/21/2022	BBK	Reviewing emails re Ds' portion of combined joint sealing motion.	0.1	
7/21/2022	AX	Review Defendants' section of joint sealing motion.	0.3	
7/21/2022	AX	Review draft proposed order.	0.5	
7/21/2022	AX	Correspondence with team re joint filing.	0.6	
7/21/2022	AX	Review memos and summary chart of documents.	2.0	
7/21/2022	AX	Draft Pls' section of joint sealing motion.	5.0	
7/21/2022	KES	Assist with Plaintiffs' revisions to draft joint proposed sealing order.	1.6	
7/21/2022	KES	Review and compare draft SW chart with proposed order; confer JY re same.	2.0	
7/22/2022	GCG	Emails to GW and team re July 8 transcript and progress on sealing motion.	0.1	
7/22/2022	JSY	Multiple emails and calls re sealing filing; draft and edit same.	6.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/22/2022	BBK	Reviewing emails re drafting Pls' section of combined joint sealing motion.	0.1	
7/22/2022	BBK	Reviewing transcript of class cert hearing.	0.7	
7/22/2022	AX	Email correspondence with team re joint sealing motion.	0.3	
7/22/2022	AX	Revise Pls' section of joint sealing motion and related references to the proposed order.	2.2	
7/22/2022	AX	Confer with JSY re same.	0.4	
7/22/2022	AX	Resolve additional edits to joint sealing motion.	1.3	
7/22/2022	KES	Circulate class cert hearing transcript and arrange for payment of invoice.	0.2	
7/22/2022	KES	Download documents with marked redactions.	0.4	
7/22/2022	KES	(Billing Judgment) Resolve Kiteworks download issue.	0.0	0.2
7/23/2022	BBK	Reviewing draft consolidated joint motion to seal and proposed order listing parties' positions.	0.3	
7/25/2022	GCG	Confs w/ JSY and emails to GM, JY and GW re motion to seal revisions and filing.	0.7	
7/25/2022	GCG	Emails to GW and team re experts.	0.2	
7/25/2022	JSY	Edit and finalize sealing filings; multiple emails and conf. re same.	3.2	
7/25/2022	JSY	Draft memo re fees issues; conf. w/ GCG re same.	0.5	
7/25/2022	BBK	Reviewing comm'ns w/ co-counsel and opposing counsel re: revising/finalizing joint combined sealing motion and supporting docs.	0.2	
7/25/2022	AX	Review Brookdale edits to joint sealing brief and email correspondence with team.	0.5	
7/25/2022	AX	Calls and conferring with JSY re sealing filing.	0.5	
7/25/2022	AX	Email correspondence with GW and team re GW declaration for sealing motion.	0.3	
7/25/2022	AX	Review team correspondence for joint sealing filing.	0.3	
7/26/2022	GCG	Emails to GW and JY re meeting to discuss motion for summary judgment.	0.1	
7/26/2022	GCG	Review court orders re sealing.	0.1	
7/26/2022	GCG	Conf w/ KES re same.	0.1	
7/26/2022	JSY	Emails re sealing filing and redacted and unredacted versions of documents.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/26/2022	JSY	Emails re meeting re MSJ.	0.2	
7/26/2022	BBK	Reviewing e-mails re Ds' filing of joint combined motion to seal; conferring w/ JSY re meeting w/ co-counsel on potential summary judgment motion.	0.1	
7/26/2022	KES	Download and organize filed sealing motion pleadings.	1.4	
7/27/2022	GCG	Email w. GW re next steps.	0.1	
7/28/2022	KES	Follow up re unredacted versions of pleadings not provided by opposing counsel; update electronic files re same.	0.8	
7/29/2022	GCG	Review and analyze expert invoices.	0.1	
7/29/2022	GCG	Emails to GW and DM re same.	0.2	
8/1/2022	GCG	Emails to JSY, MJ and GW re sealing motion and team meeting.	0.2	
8/1/2022	GCG	Review court order re pro hac application.	0.1	
8/1/2022	JSY	Emails re filed sealed documents.	0.1	
8/1/2022	JSY	Emails re notice from court.	0.1	
8/1/2022	KES	Update pleadings files.	0.3	
8/2/2022	GCG	Prepare for and conduct call w/ GW re experts and trial planning.	0.4	
8/2/2022	GCG	Email to KS re same.	0.1	
8/2/2022	GCG	Email to MJ and team re sealing motion.	0.1	
8/2/2022	JSY	Call with GCG re experts issue.	0.1	
8/3/2022	JSY	(Billing Judgment) Orientation meeting with LW; emails re key documents.	0.0	0.8
8/3/2022	AX	Call with MP re issues at Brookdale Scotts Valley.	0.5	
8/4/2022	GCG	Email KS and GW re meeting.	0.1	
8/5/2022	GCG	Prepare for co-counsel meeting.	0.2	
8/5/2022	GCG	Communications w/ KS, GW and DM re same.	0.2	
8/6/2022	GCG	Email w/ putative class member re deceptive practices at Brookdale Scotts Valley.	0.1	
8/8/2022	GCG	Emails to GW, KS and MJ re co-counsel meeting and status of discovery efforts.	0.5	
8/8/2022	BBK	Reviewing M Johnson emails re status of discovery and discovery disputes.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/8/2022	LHW	(Billing Judgment) Supplemental Conflicts Check on new opposing counsel.	0.0	0.5
8/9/2022	GCG	Prepare for and conduct meeting w/ co-counsel re ADA motion for summary judgment and potential discovery motions before class certification.	0.8	
8/9/2022	GCG	Prepare for and conduct meeting w/ GW and KS re overall trial strategy and approach.	0.4	
8/9/2022	GCG	Follow up emails re same.	0.1	
8/9/2022	GCG	Conf w/ JSY, AX, KES and LW re factual issues raised by motion for summary judgment.	0.5	
8/9/2022	JSY	Team meeting re MSJ (1.1); RBGG only meeting (0.1).	1.2	
8/9/2022	JSY	Call with AX re MSJ.	0.5	
8/9/2022	JSY	Conf. w/ GCG re MSJ plan.	0.2	
8/9/2022	JSY	Emails re co-counsel meeting and notes.	0.2	
8/9/2022	BBK	Reviewing GC memo re potential bases for partial summary judgment motion and JSY notes re meeting on same.	0.1	
8/9/2022	AX	Team strategy meeting re MSJ and correspondence with team re same (1.2); email correspondence with LK re same (.1).	1.3	
8/9/2022	KES	Team meeting re MSA.	0.8	
8/9/2022	LRW	Cocounsel meeting.	1.1	
8/9/2022	LRW	Summarize draft and summarize cocounsel meeting memorandum.	0.7	
8/10/2022	GCG	Email w/ co-counsel re upcoming meeting.	0.1	
8/10/2022	BBK	Reviewing M. Johnson M&C emails w/ Ds re outstanding discovery.	0.1	
8/10/2022	AX	Review team correspondence re Doug Anderson discovery issues.	0.2	
8/10/2022	KES	Tc relative of former BKD Chanate resident, email to team re same and follow up email with resources re same.	0.7	
8/10/2022	LRW	Finalize memo for cocounsel meeting.	0.2	
8/11/2022	JSY	Emails re call from family member.	0.1	
8/11/2022	BBK	Reviewing e-mails w/ opposing counsel re M&C on discovery disputes; reviewing e-mails w/ co-counsel re call from family of putative CM.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/11/2022	AX	Review team correspondence re meet and confer issues, read Ocwen Financial Corporation decertification case.	0.5	
8/11/2022	KES	Review voicemail message re Brookdale, return call and email to team re same.	0.3	
8/12/2022	JSY	Conf. w/ GCG re planning for PSJ.	0.1	
8/13/2022	GCG	Email w/ GW re overall strategy and approach.	0.1	
8/15/2022	GCG	Review and revise documents re strategy.	0.6	
8/15/2022	GCG	Emails to GW re same and overall strategy and approach.	0.4	
8/15/2022	KES	Review files for draft agreement.	0.2	
8/16/2022	GCG	Review GW revisions to agreement.	0.2	
8/16/2022	GCG	Draft report of same and case status for MWB and SJR.	0.3	
8/16/2022	GCG	Conf w/ and email to GW re plan for meeting w/ KS and DM and overall strategy and approach to case.	0.5	
8/16/2022	JSY	Emails re case strategy.	0.1	
8/16/2022	JSY	Draft memo re projects for PSJ.	0.5	
8/16/2022	MWB	Emails with GCG - SJR regarding case strategy.	0.3	
8/16/2022	SJR	Emails with GG, MB re status.	0.3	
8/17/2022	GCG	Review expert invoices.	0.2	
8/17/2022	GCG	Revise case strategy documents.	0.4	
8/17/2022	GCG	Prepare for and meet w/ KS, PM and GW.	0.9	
8/17/2022	GCG	Emails w/ co-counsel.	0.1	
8/17/2022	GCG	Draft memo to file re case status.	0.1	
8/17/2022	JSY	Call with GCG re status of case.	0.3	
8/17/2022	JSY	Emails re status.	0.1	
8/17/2022	JSY	Edit case task list and email to team.	0.2	
8/17/2022	BBK	Meeting w/ AX re case strategy and Motion for Partial Summary Judgment.	0.3	
8/17/2022	BBK	Reviewing/responding to JSY draft updated tasklist and projects for Motion for Partial Summary Judgment.	0.1	
8/17/2022	AX	Confer with BBK re fees issues.	0.3	
8/17/2022	AX	Review email correspondence and documents from team re fees issues.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 664

SERVICES

Date	Person	Description of Services	Hours	Discount
8/17/2022	KES	Update electronic files.	0.3	
8/18/2022	GCG	Prepare for and conduct meeting w/ RBGG team to plan motion for SJ on ADA issues.	0.8	
8/18/2022	GCG	Review expert witness documents.	0.2	
8/18/2022	GCG	Emails to GW and GK re same.	0.1	
8/18/2022	JSY	Team meeting re MSJ planning.	0.8	
8/18/2022	JSY	Emails re inspection stipulation; review same.	0.2	
8/18/2022	JSY	Conf. and emails re status of case.	0.6	
8/18/2022	JSY	Conf. w/ AX re SJ projects.	0.1	
8/18/2022	JSY	Conf. w/ GCG re communications with class reps; emails with class reps re status of case.	0.3	
8/18/2022	JSY	Emails and messages re fees.	0.2	
8/18/2022	BBK	RBGG team meeting on plan for Motion for Partial Summary Judgment.	0.8	
8/18/2022	BBK	Conferring w/ RBGG team re Ds' admissions in stipulation re inspections of BD facilities by access experts.	0.1	
8/18/2022	AX	Confer re case tasks and fees issues.	0.3	
8/18/2022	AX	Review notes in preparation for meeting re MSJ.	0.5	
8/18/2022	AX	Meeting with GCG, JSY, BBK, KES, LW re MSJ and case issues.	0.9	
8/18/2022	AX	Meet with LW re background on Brookdale case and MSJ issues.	0.3	
8/18/2022	KES	Team meeting re motion for summary judgment.	0.8	
8/18/2022	KES	Email team re stipulated order re inspections.	0.1	
8/18/2022	LRW	Attend team meeting re case issues.	0.9	
8/19/2022	GCG	Revise memo to file re attorneys' fees and costs.	0.3	
8/19/2022	GCG	Conf w/ and emails to JSY re same.	0.3	
8/19/2022	GCG	Email w/ DM re expert costs for trial.	0.2	
8/19/2022	GCG	Revise memo.	0.3	
8/19/2022	GCG	Email to DM, KS and GW re same.	0.1	
8/19/2022	GCG	Email BBK and team re recent ADA motion for SJ.	0.1	
8/19/2022	JSY	Edit document re fees emails re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/19/2022	JSY	Draft and edit email re fees and memo re fees emails re same.	2.9	
8/19/2022	BBK	Reviewing M Johnson updates re M&C on Ds' failure to produce responsive docs from access expert and draft Pls' portion of joint discovery letter brief.	0.1	
8/19/2022	AX	Confer with JSY re case tasks and fees issues.	0.1	
8/22/2022	JSY	Emails with clients re transcript.	0.1	
8/22/2022	JSY	Review class cert hearing transcript.	0.8	
8/23/2022	GCG	Email w/ BBK re pleadings in support of motion for summary judgment.	0.2	
8/23/2022	GCG	Review email re fees.	0.2	
8/23/2022	GCG	Research and draft email to GW re same and re overall plan for trial.	0.6	
8/23/2022	GCG	Conf w/ and email to JSY re same.	0.2	
8/23/2022	JSY	Conf. w/ GCG re fees issues.	0.2	
8/23/2022	JSY	Review and edit email to GBW.	0.4	
8/23/2022	BBK	Reviewing/responding to GCG query re obtaining MSJ briefing on ADA claim against assisted living facility in prep for partial MSJ on same.	0.2	
8/23/2022	AX	Review team correspondence re partial motion for summary judgment issues.	0.3	
8/24/2022	GCG	Research and review memo to GW re trial planning and potential fee petition.	0.9	
8/24/2022	GCG	Conf w/ JSY and email to SJR and MWB re same.	0.2	
8/24/2022	JSY	Emails and conf. re fees issues.	0.3	
8/24/2022	SJR	Emails re status.	0.2	
8/24/2022	AX	Research Title III ADA motion for summary judgment issues.	1.5	
8/25/2022	GCG	Conf w/ MWB and email to JSY re status and fees issues.	0.2	
8/25/2022	GCG	Email to KES re transcript order by Jones Day.	0.1	
8/25/2022	JSY	Emails re fees issues.	0.2	
8/25/2022	JSY	Prepare MSJ.	0.1	
8/25/2022	MWB	Telephone call with GCG and email SJR regarding status and fees issues.	0.3	
8/25/2022	AX	Legal research re MSJ issues.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/25/2022	KES	Download and circulate transcript order and online research re Jones Day re same.	0.3	
8/26/2022	GCG	Emails w/ GW re trial planning.	0.1	
8/26/2022	JSY	Call with GCG re fees issues.	0.3	
8/26/2022	JSY	Emails re case where SJ granted for Ps on ADA claims.	0.3	
8/26/2022	JSY	Emails re fees issues.	0.1	
8/26/2022	BBK	Comm'ns w/ RBGG team re legal research for partial MSJ on ADA claims.	0.1	
8/26/2022	AX	Legal research re ADA and summary judgment issues.	1.5	
8/26/2022	AX	Review team correspondence re MSJ research.	0.1	
8/26/2022	AX	Review correspondence from opposing counsel re letter brief.	0.2	
8/26/2022	AX	Review team correspondence re potential amici.	0.1	
8/26/2022	KES	PACER research and summarize case re ADA issue.	0.4	
8/29/2022	GCG	Review and respond to GW report on preparation for trial.	0.2	
8/29/2022	GCG	Confs w/ MWB and JSY re same.	0.2	
8/29/2022	GCG	Conf w/ JSY re summary judgment motion.	0.2	
8/29/2022	JSY	Call with GCG.	0.2	
8/29/2022	JSY	Emails re reversal of class cert order.	0.1	
8/29/2022	JSY	Emails re fees issue.	0.1	
8/29/2022	JSY	Draft MSJ; research re same.	1.9	
8/29/2022	BBK	Reviewing/reporting to team on recent 9th Cir class cert opinion on predominance/damages relevant to our pending cert motion.	0.2	
8/29/2022	BBK	Reviewing revised joint discovery letter brief re docs withheld by Ds' access expert.	0.1	
8/30/2022	GCG	Emails to MJ and team re discovery dispute letter.	0.2	
8/30/2022	GCG	Review document re client.	0.1	
8/30/2022	GCG	Emails re same.	0.2	
8/30/2022	GCG	Email w/ GW and BJ re issues re case planning.	0.3	
8/30/2022	JSY	Emails and conf re fees issue.	0.2	
8/30/2022	BBK	Reviewing comm'ns w/ co-counsel re Ds' additional edits to joint discovery letter brief re: Ds' access expert's photos/docs.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/31/2022	GCG	Review discovery filing re expert documents.	0.1	
9/1/2022	GCG	Review and analyze GW trial plan.	0.2	
9/1/2022	GCG	Email w/ KE re issue with client.	0.1	
9/1/2022	GCG	Prepare for call w/ GW.	0.3	
9/2/2022	GCG	Research and draft memo re fees issues.	1.0	
9/2/2022	GCG	Conf w/ and email to KE re same.	0.5	
9/2/2022	GCG	Prepare for and conduct call w/ GW re same and re trial planning.	0.5	
9/2/2022	GCG	Emails to SJR, MWB and JSY re same.	0.2	
9/4/2022	JSY	Review memos re fees issues.	0.2	
9/6/2022	GCG	Conf w/ and email to JSY re potential new staffing expert.	0.3	
9/6/2022	JSY	Call with GCG re fees issues and staffing analysis.	0.3	
9/6/2022	JSY	Research re staffing experts.	0.3	
9/7/2022	GCG	Emails re meeting.	0.1	
9/7/2022	GCG	Confs w/ JSY and email to GW re potential new expert and motion for summary judgment.	0.2	
9/7/2022	JSY	Conf. w/ GCG re expert issue.	0.2	
9/8/2022	GCG	Conf w/ and emails to GW re staffing expert, Rule 26 conference, and planning for trial and settlement.	0.5	
9/8/2022	GCG	Conf w/ and emails to JSY re same and re motion for summary judgment and co-counseling meeting.	0.3	
9/8/2022	GCG	Review memo.	0.1	
9/8/2022	GCG	Email w/ KE.	0.1	
9/8/2022	JSY	Emails re team meeting.	0.1	
9/8/2022	BBK	Comm'ns w/ team re co-counsel meeting on case status.	0.1	
9/8/2022	AX	Correspondence to team re cocounsel meeting and case tasks.	0.1	
9/8/2022	AX	Research and draft memo on summary judgment issues.	1.5	
9/9/2022	GCG	Emails to GW, MJ, DM, KS and JSY re case planning.	0.3	
9/9/2022	GCG	Conf w/ JM and KE.	0.5	
9/9/2022	JSY	Emails and conf. re fees issue.	0.2	
9/10/2022	GCG	Prepare for co-counsel meetings.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/12/2022	GCG	Prepare for and conduct meeting w/ co-counsel re objection to MJ order and motion for summary judgment.	1.0	
9/12/2022	GCG	Conf w/ GW and email to partners re co-counsel issues and plan for trial.	0.3	
9/12/2022	JSY	Team meeting.	0.6	
9/12/2022	SJR	Email report.	0.3	
9/12/2022	BBK	Conferring w/ JSY/AX re preparing partial MSJ on ADA claims.	0.1	
9/12/2022	BBK	Reviewing MJ Beeler Order on discovery disputes.	0.1	
9/12/2022	BBK	Meeting w/ co-counsel re responding to discovery order and partial MSJ.	0.6	
9/12/2022	AX	Attend Brookdale cocounsel call re strategy, discovery, and MSJ issues.	0.8	
9/12/2022	AX	Email correspondence with team re current project status.	0.1	
9/12/2022	KES	Zoom meeting with co-counsel re discovery order and MSJ.	0.8	
9/12/2022	LRW	Prepare for and attend monthly co-counsel meeting.	1.0	
9/13/2022	GCG	Conf w/ JSY and email GW re meeting.	0.1	
9/13/2022	JSY	Research for MSJ; emails re same.	1.9	
9/13/2022	SJR	Email from MB.	0.1	
9/13/2022	BBK	Conferring w/ JSY re legal research for partial MSJ on ADA claims.	0.1	
9/14/2022	GCG	Review email and voicemail from Whistleblower; email BBK re same.	0.1	
9/14/2022	GCG	Meet w/ GW and MJ re experts for trial.	0.5	
9/14/2022	JSY	Call with AX re MSJ.	0.5	
9/16/2022	GCG	Review and revise motion re Judge Beeler's discovery stay.	0.2	
9/16/2022	GCG	Conf w/ GW and MJ and emails to BBK re same.	0.2	
9/16/2022	JSY	Emails re firm change; research re same.	0.2	
9/16/2022	JSY	Emails re filing re discovery order.	0.1	
9/16/2022	BBK	Conferring w/ RBGG re commenting on draft motion for relief from MJ's 9/2 discovery order.	0.1	
9/16/2022	BBK	Reviewing/revising draft motion for relief from MJ's 9/2 discovery order.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/16/2022	BBK	Reviewing/approving revised draft motion for relief from MJ's 9/2 discovery order.	0.2	
9/16/2022	AX	Review email correspondence re motion for relief from nondispositive order; review motion.	0.3	
9/16/2022	AX	Email correspondence re change in Brookdale counsel.	0.1	
9/16/2022	KES	Circulate filed motion and calendar deadlines.	0.2	
9/19/2022	GCG	Emails to GW and JY re motion for summary judgment and MJ order re discovery.	0.2	
9/19/2022	JSY	Meeting with GBW, BBK, AX re MSJ.	0.6	
9/19/2022	JSY	Emails re discovery order.	0.1	
9/19/2022	JSY	Conf. w/ GCG re fees.	0.1	
9/19/2022	BBK	Reviewing G. Wallace legal research re Ds' affirmative duty to make facilities accessible and complete readily achievable barrier removal w/o request from PWD; incorporating research re ADA's prohibition on surcharge on PWDs for actions taken to comply w/ ADA to same.	0.4	
9/19/2022	BBK	Meeting w/ G Wallace, JSY and AX re plan for partial MSJ on certain ADA claims/issues.	0.4	
9/19/2022	BBK	Emailing w/ G. Wallace post-meeting on plan for partial MSJ.	0.1	
9/19/2022	BBK	Reviewing Supplemental Court Order on discovery dispute IRT Pls' Motion for Reconsideration; conferring w/ team re same.	0.1	
9/20/2022	BBK	Reviewing M Johnson FU w/ Ds re compliance w/ Supplemental Order on Discovery Dispute.	0.1	
9/22/2022	GCG	Confs w/ JSY re change of defense counsel firm and potential fee petition.	0.3	
9/22/2022	GCG	Emails to GW, MJ and JSY re potential fee petition.	0.2	
9/22/2022	JSY	Conf. w/ GCG re fees issue.	0.2	
9/22/2022	JSY	Emails re counsel change.	0.1	
9/22/2022	JSY	Review declaration re fees; emails re same.	0.2	
9/22/2022	KES	Review list of facilities with post 1991 construction that have been inspected; check DSS status; consider logistics for barrier list.	1.3	
9/23/2022	GCG	Conf w/ JSY and BBK re potential amici.	0.1	
9/23/2022	GCG	Emails to JSY and KES re exhibit for MSJ.	0.1	
9/23/2022	GCG	Email to MJ and defendants re discovery dispute.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 670

SERVICES

Date	Person	Description of Services	Hours	Discount
9/23/2022	JSY	Research for SJ motion; draft same.	1.9	
9/23/2022	AX	Email correspondence re class certification motion opposition.	0.1	
9/23/2022	AX	Review email correspondence re joint letter brief and privilege log.	0.1	
9/23/2022	AX	Email correspondence re facility sued due to wrongful death.	0.1	
9/23/2022	KES	Review most recent filed and under seal versions of Defs opp brief and confer JY re same.	0.4	
9/25/2022	GCG	Review DM declaration.	0.1	
9/25/2022	GCG	Emails to GW and JSY re same and re pre-trial.	0.1	
9/26/2022	GCG	Review and revise draft document re case strategy.	0.2	
9/26/2022	GCG	Conf w/ and email to GW re same and re pre-trial discovery and overall strategy and approach.	0.4	
9/26/2022	LRW	Locate and save research re similar litigation.	0.4	
9/27/2022	GCG	Email DM, GW & MJ re meeting re co-counsel agreement and plan for trial preparation.	0.1	
9/27/2022	KES	Review expert declarations and gather barrier list markups for potential modified barrier list project.	1.3	
9/29/2022	GCG	Emails with DM and GW re meeting.	0.2	
9/29/2022	BBK	Reviewing MJ report re BD annual surveys sent to putative class members and planned advice re same.	0.1	
9/30/2022	GCG	Prepare for and conduct meeting w/ DM and GW re trial planning and approach.	0.7	
9/30/2022	GCG	Follow up emails w/ DM and GW re same.	0.3	
9/30/2022	GCG	Emails w/ JSY and team re Brookdale motion to stay discovery.	0.2	
9/30/2022	JSY	Review Defs' motion for stay of discovery; emails re same.	0.4	
9/30/2022	BBK	Reviewing Court Order on sealing motions.	0.1	
9/30/2022	BBK	Conferring w/ RBGG team re hearing date and deadline for opposition to Ds' improperly noticed motion to stay discovery; checking local rules and J Gilliam's schedule re same.	0.3	
9/30/2022	BBK	Conferring w/ team re plan to oppose motion to stay discovery.	0.1	
9/30/2022	KES	Download and circulate pleadings and calendar motion deadlines.	0.3	
10/1/2022	GCG	Email to GW re experts trial planning.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/1/2022	JSY	Emails re Opp to Motion to Stay.	0.2	
10/1/2022	AX	Email correspondence re opposition to motion to stay.	0.2	
10/2/2022	GCG	Email w/ MH re document retention and case status.	0.1	
10/2/2022	AX	Review email correspondence re opposition to motion to stay (.1); review motion to stay (.6).	0.7	
10/3/2022	GCG	Emails to GW and JSY re expert issues and motion to stay.	0.1	
10/3/2022	JSY	Emails re motion to stay.	0.1	
10/3/2022	BBK	Conferring w/ RBGG team re corrected briefing deadline for opp and reply to Ds' Motion to Stay Discovery.	0.1	
10/3/2022	AX	Review Motion to Stay and related team correspondence re same.	1.0	
10/3/2022	AX	Draft outline for opposition and review case law.	1.5	
10/3/2022	KES	Update calendar.	0.1	
10/4/2022	GCG	Email JSY and team re opposition to motion to stay.	0.1	
10/4/2022	JSY	Conf. w/ AX re motion to stay.	0.3	
10/4/2022	AX	Meet with JSY re opposition to motion to stay.	0.3	
10/4/2022	AX	Review motion to stay and related materials.	0.5	
10/7/2022	GCG	Email to JSY and team re potential sale of Brookdale.	0.1	
10/7/2022	JSY	Emails re possible sale of company.	0.1	
10/7/2022	JSY	Draft MSJ; messages re same.	0.2	
10/7/2022	BBK	Conferring w/ JSY and AX re partial motion for summary judgment.	0.1	
10/7/2022	AX	Review briefing for opposition to motion to stay and related legal research.	1.4	
10/7/2022	LRW	Locate and save factual evidence for JSY.	0.2	
10/9/2022	JSY	Draft MSJ.	2.8	
10/9/2022	AX	Research and draft opposition to motion to stay.	4.5	
10/10/2022	AX	Call with BU re Sunrise discovery issues as relevant to opposition to motion to stay.	0.4	
10/10/2022	AX	Research and draft opposition to motion to stay.	4.5	
10/11/2022	JSY	Emails re Opp to Motion to Stay.	0.1	
10/11/2022	AX	Research and draft opposition to motion to stay.	4.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 672

SERVICES

Date	Person	Description of Services	Hours	Discount
10/12/2022	JSY	Meet with LW re MSJ depo citation project.	0.3	
10/12/2022	JSY	Conf. w/ AX re Opp to Motion to Stay.	0.1	
10/12/2022	JSY	Conf. w/ AX re Opp to Motion to Stay.	0.2	
10/12/2022	JSY	Edit Opp to Motion to Stay; emails re same.	2.4	
10/12/2022	BBK	Reviewing AX draft Opposition to Ds' Motion to Stay Discovery and JSY comments thereon.	0.2	
10/12/2022	AX	Calls with JSY re opposition.	0.3	
10/12/2022	AX	Email correspondence to team re timing for opposition to motion to stay.	0.2	
10/12/2022	AX	Revise opposition and send to cocounsel.	2.5	
10/12/2022	LRW	Meeting with JSY to discuss summary judgment project.	0.3	
10/13/2022	JSY	Conf. w/ GJG re case status.	0.2	
10/13/2022	JSY	Conf. w/ AX multiple times re Opp to Motion to Stay.	0.2	
10/13/2022	JSY	Emails re Defs' section of letter brief.	0.3	
10/13/2022	JSY	Review Opp to Motion to Stay; emails re same.	1.4	
10/13/2022	BBK	Reviewing co-counsel comments on draft Opposition to Motion to Stay.	0.1	
10/13/2022	BBK	Reviewing Ds' revised section of joint letter brief re ADA expert photos.	0.1	
10/13/2022	AX	Review email correspondence from team and revisions to Oppositions; incorporate changes into draft; related correspondence with JSY re progress on draft.	1.2	
10/13/2022	AX	Review updated discovery letter brief as relevant to Opposition; email correspondence and phone call with JSY re same.	0.4	
10/13/2022	GJG	(Billing Judgment) Review Kiteworks emails from D counsel and troubleshoot access.	0.0	0.2
10/13/2022	GJG	(Billing Judgment) Confer to JY re upcoming stages of Brookdale litigation.	0.0	0.2
10/14/2022	JSY	Call with AX re Opp to Motion to Stay.	0.1	
10/14/2022	JSY	Emails re letter brief.	0.1	
10/14/2022	JSY	Emails and messages re Opp to Motion to Stay; review same.	0.3	
10/14/2022	BBK	Conferring w/ co-counsel re motion to compel inspection photos/notes from ADA expert.	0.1	
10/14/2022	BBK	Legal research for partial MSJ on ADA claims.	2.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 673

SERVICES

Date	Person	Description of Services	Hours	Discount
10/14/2022	BBK	Reviewing Opposition to Motion to Stay Discovery.	0.2	
10/14/2022	AX	Cite check of opposition to motion to stay discovery pending class certification.	2.5	
10/14/2022	AX	Email correspondence re filing; finalize and assist with filing Opposition to Motion to Stay Discovery Pending Class Certification.	0.5	
10/14/2022	FGL	Email from/to AX re revision to TOA, revise same (.1); call with AX re edit to citation, revise same (.1).	0.2	
10/14/2022	KES	Efile opposition to motion to stay; confer AX re same.	0.4	
10/14/2022	KES	Zoom meeting with LW re TextMap reports and coding and task for summary judgment.	0.5	
10/14/2022	KES	Download and circulate privilege log.	0.2	
10/14/2022	LRW	Meet and confer with KES re summary judgment fleet safety protocol project.	0.5	
10/16/2022	GCG	Review and analyze opposition to stay motion.	0.4	
10/16/2022	GCG	Review MJ and GW emails re discovery letter brief.	0.1	
10/17/2022	GCG	Conf w/ JSY re research needed for motion for summary judgment and opposition to stay.	0.3	
10/17/2022	GCG	Email to GW re status.	0.1	
10/17/2022	JSY	Conf. w/ GCG re case status.	0.2	
10/18/2022	GCG	Emails to GW and team re joint letter brief re expert documents.	0.1	
10/18/2022	GCG	Conf w/ JSY re drafting motion for SJ.	0.1	
10/18/2022	JSY	Call with AX re motion for stay and discovery letter brief.	0.3	
10/18/2022	JSY	Conf. w/ GCG, AX, GJG and BBK re status of MSJ.	0.2	
10/18/2022	JSY	Draft MSJ.	0.8	
10/18/2022	AX	Review draft of letter brief, review case law re communications between attorneys and experts, and draft comments in email to team.	1.5	
10/18/2022	GJG	(Billing Judgment) Review email and memo from BKK in advance of meeting.	0.0	0.2
10/19/2022	GCG	Review AX authorities for discovery letter brief.	0.4	
10/19/2022	GCG	Emails to JSY and AX re same.	0.3	
10/19/2022	JSY	Conf. w/ KES re access barriers and new construction lists.	0.2	
10/19/2022	JSY	Draft MSJ.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 674

SERVICES

Date	Person	Description of Services	Hours	Discount
10/19/2022	JSY	Emails re letter brief; conf. w/ AX re same.	0.2	
10/19/2022	BBK	Reviewing AX legal research for joint letter brief and MJ's revised Pls' section of same.	0.2	
10/19/2022	AX	Research re communications between attorneys and expert witnesses; email correspondence to team re revisions to joint letter brief re same.	1.3	
10/19/2022	KES	Confer JY re list of newly constructed facilities.	0.2	
10/20/2022	JSY	Emails re intake re Brookdale.	0.2	
10/20/2022	LRW	Compile document containing depo segments relating to Fleet Safety protocol for summary judgment motion.	1.9	
10/21/2022	GCG	Email to BBK and team re defendants' reply re motion to stay.	0.1	
10/21/2022	JSY	Emails re Defs' Reply re stay motion.	0.2	
10/21/2022	JSY	Emails re memo re fleet safety policy.	0.1	
10/21/2022	JSY	Emails re Brookdale resident death.	0.1	
10/21/2022	BBK	Reviewing Ds' Reply ISO Motion to Stay Discovery.	0.1	
10/21/2022	KES	Download and circulate pleading.	0.1	
10/21/2022	LRW	Draft and finalize memorandum containing sections of deposition relating to fleet safety protocol.	3.2	
10/24/2022	JSY	Review LW memo re depo excerpts re transport issues; emails re same.	0.2	
10/24/2022	JSY	Draft MSJ.	1.5	
10/25/2022	JSY	Conf. w/ GCG re status of projects.	0.1	
10/25/2022	JSY	Draft MSJ; emails re same.	0.9	
10/25/2022	BBK	Reviewing JSY email to KES re identifying access barriers at BD facilities to include in partial MSJ.	0.1	
10/25/2022	KES	Review JY email re modified barrier list.	0.1	
10/25/2022	LRW	Revise document containing deposition excerpts relating to fleet safety protocol.	0.9	
10/26/2022	JSY	Conf. w/ KES re barrier issue for new construction.	0.1	
10/26/2022	JSY	Draft MSJ.	1.0	
10/26/2022	BBK	Reviewing Ds' response to draft discovery letter brief seeking production of Ds' access expert materials and MJ email re same.	0.1	
10/26/2022	KES	Review new construction barrier lists marked up by Anderson and create summary chart re selected barriers.	2.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/27/2022	JSY	Draft MSJ; research re same.	0.8	
10/27/2022	KES	Continue review of select barrier list for possible inclusion in motion.	0.9	
10/28/2022	GCG	Review emails from co-counsel re discovery letter brief.	0.1	
10/28/2022	BBK	Reviewing joint discovery letter brief re Ds' access expert's photos/materials and comm'ns w/ opposing counsel re filing same.	0.1	
10/28/2022	KES	Download and circulate pleading.	0.1	
10/31/2022	BBK	Legal research re: ADA prohibition on surcharges for partial MSJ.	1.2	
10/31/2022	KES	Revise barrier list chart and email team re same.	0.4	
11/1/2022	GCG	Conf w/ JSY re and KES re status of tasks.	0.1	
11/1/2022	GCG	Conf w/ JSY and emails to JSY, GW and AX re oral argument on motion to stay.	0.2	
11/1/2022	GCG	Review court orders re GM and JR withdrawal.	0.1	
11/1/2022	JSY	Emails and calls re fees issues.	0.3	
11/1/2022	JSY	Emails and conf. re motion for stay hearing.	0.2	
11/1/2022	BBK	Reviewing G. Maatman & J. Riley motions to withdraw as counsel for BD; court order granting same.	0.1	
11/1/2022	AX	Email correspondence with team re attorney withdrawals.	0.1	
11/1/2022	AX	Confer with JSY re motion to stay discovery hearing and other case tasks, including related email correspondence.	0.3	
11/1/2022	KES	Download and circulate pleadings.	0.2	
11/1/2022	KES	Review and summarize bills.	0.7	
11/2/2022	LRW	Save item to research.	0.1	
11/3/2022	GCG	Conf w/ JSY re research memo re fees issues.	0.2	
11/3/2022	JSY	Call with GCG re fees issues.	0.2	
11/3/2022	JSY	Draft memo re fees issues.	1.5	
11/4/2022	GCG	Email to AX and team re price increase imposed on named plaintiff.	0.1	
11/4/2022	JSY	Emails re MSJ research.	0.1	
11/4/2022	BBK	Reviewing B. Jestrabek-Hart update re large BD rate increase.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 676

SERVICES

Date	Person	Description of Services	Hours	Discount
11/4/2022	BBK	Preparing legal research on ADA surcharge provision for JSY; emailing her re same.	0.3	
11/4/2022	AX	Call with Bernie Jestrabek-Hart and email w/ team re same.	0.5	
11/4/2022	AX	Rreview BBK email and memos re legal research.	0.2	
11/5/2022	GCG	Email to family member re Brookdale errors.	0.1	
11/7/2022	AX	Email correspondence and research re Brookdale cases in TN, NC, FL.	0.5	
11/7/2022	KES	Online research re cases in TN and FL.	0.3	
11/8/2022	JSY	Emails re motion for stay hearing.	0.1	
11/8/2022	JSY	Emails re OR Brookdale resident.	0.1	
11/8/2022	GJG	Review email re court's decision to vacate hearing order.	0.1	
11/11/2022	GCG	Emails to GW, KES and team re staffing survey.	0.2	
11/11/2022	JSY	Emails re meeting re fees issue.	0.1	
11/14/2022	JSY	Conf. w/ AX re MSJ assignments and brief.	0.3	
11/14/2022	JSY	Emails re meeting to discuss fees issues.	0.1	
11/14/2022	JSY	Draft memo re fees issues; research re same.	1.1	
11/14/2022	JSY	Conf. w/ AX re same.	0.2	
11/14/2022	AX	Confer with JSY re case issues and MSJ.	0.3	
11/14/2022	AX	Confer with JSY re fees issue.	0.2	
11/15/2022	GCG	Conf w/ and emails to JSY re discovery hearing and motion for summary judgment.	0.3	
11/15/2022	JSY	Conf. w/ GCG re discovery hearing and MSJ briefing plan.	0.2	
11/15/2022	JSY	Emails re discovery hearing.	0.1	
11/15/2022	JSY	Emails re fees issues.	0.2	
11/15/2022	JSY	Emails re coverage for discovery hearing.	0.1	
11/15/2022	AX	Email correspondence re appearance at 11/17 discovery hearing.	0.2	
11/15/2022	AX	Review material for 11/17 discovery conference.	0.5	
11/15/2022	GJG	(Billing Judgment) Draft and send emails to JY re plan for Brookdale assignments.	0.0	0.1
11/16/2022	GCG	Conference with JSY re discovery hearing.	0.1	
11/16/2022	JSY	(Reduced Charge) Conf. w/ GJG re research for MSJ.	0.6	0.2

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 677

SERVICES

Date	Person	Description of Services	Hours	Discount
11/16/2022	JSY	Two calls with AX re discovery hearing tomorrow.	0.4	
11/16/2022	JSY	Emails and messages re discovery hearing.	0.1	
11/16/2022	JSY	Draft MSJ.	1.9	
11/16/2022	JSY	Conf. w/ GCG re MSJ research and discovery hearing.	0.1	
11/16/2022	AX	Legal research and related preparation for discovery hearing based on call with MJ.	1.7	
11/16/2022	AX	Calls with MJ re discovery hearing.	0.8	
11/16/2022	AX	Confer with JSY re hearing logistics.	0.2	
11/16/2022	GJG	Discuss legal issues to be addressed in partial MSJ.	0.6	
11/17/2022	JSY	Emails and conf. re discovery hearing.	0.3	
11/17/2022	JSY	Conf. w/ AX re MSJ.	0.7	
11/17/2022	JSY	Draft MSJ and research re same.	1.0	
11/17/2022	JSY	Emails re barrier list project.	0.1	
11/17/2022	JSY	Emails re discovery hearing.	0.1	
11/17/2022	AX	Legal research re prep for hearing and draft email to MJ.	1.0	
11/17/2022	AX	Meeting with JSY re MSJ legal and factual issues.	0.5	
11/17/2022	AX	Call with MJ re hearing and prep re same.	0.8	
11/17/2022	AX	Attend hearing.	2.0	
11/17/2022	AX	Conf with JSY re hearing.	0.1	
11/17/2022	AX	Email summary to team re same.	0.1	
11/17/2022	AX	Review privilege log and other MSJ evidence, and email correspondence with team re same.	1.2	
11/17/2022	KES	Confer AX and JY re barrier list analysis for summary judgment; gather additional lists for analysis.	0.7	
11/18/2022	GCG	Prepare for and conduct meeting w/ GW, MJ and JSY re discovery order, expert analysis of staffing.	0.7	
11/18/2022	JSY	Call with GCG to prep for meeting re experts issues.	0.1	
11/18/2022	JSY	Emails re discovery hearing.	0.1	
11/18/2022	JSY	Meeting with GCG, MTJ, GW re expert issues.	0.6	
11/18/2022	AX	Email correspondence re hearing transcript.	0.1	
11/18/2022	AX	Email with MJ re hearing transcripts.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/18/2022	KES	Prepare and file transcript order request.	0.3	
11/21/2022	GCG	Email to KES re call from putative class member.	0.1	
11/21/2022	KES	TC relative of former resident re status of case.	0.2	
11/22/2022	KES	Circulate hearing transcript and arrange for payment to court reporter.	0.2	
11/23/2022	GCG	Emails to MJ and MJ re compliance w/ MJ order re expert photographs and materials.	0.1	
11/23/2022	GCG	Review and analyze transcript of discovery hearing re same.	0.4	
11/23/2022	GCG	Review and revise doc. re expert issues.	0.5	
11/23/2022	GCG	Emails to GW re same.	0.1	
11/28/2022	GCG	Conf w/ JSY re motion for summary judgment.	0.1	
11/28/2022	GCG	Conf w/ AX re discovery follow up and motion for summary judgment.	0.1	
11/28/2022	GCG	Email to GW re expert issues.	0.1	
11/29/2022	GCG	Email to GW and team re expert issues.	0.1	
11/29/2022	KES	Continue barrier list review and listing of selected barriers in new construction for summary judgment.	2.0	
11/30/2022	GCG	Conf w/ KS re settlement overture.	0.2	
11/30/2022	GCG	Review document re same.	0.2	
11/30/2022	GCG	Email to GW and team re same.	0.1	
11/30/2022	KES	Continue spreadsheet list of selected barriers for summary judgment.	1.5	
12/5/2022	JSY	Emails re divestment of facilities.	0.1	
12/5/2022	JSY	Emails re call from resident's daughter.	0.1	
12/5/2022	JSY	Emails re research for MSJ.	0.1	
12/5/2022	GJG	Legal research related to ADA arguments in MSJ.	0.4	
12/5/2022	KES	TC relative of former BKD resident; emails with team re same.	0.3	
12/6/2022	GJG	Research legal issues for partial MSJ and draft memo re: same.	3.7	
12/7/2022	GJG	Research legal issues for partial MSJ and draft memo re: same.	4.0	
12/8/2022	GCG	Conf w/ JSY and email to GW and team re meeting to discuss motion for summary judgment.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 679

SERVICES

Date	Person	Description of Services	Hours	Discount
12/8/2022	JSY	Call with GCG re meeting tomorrow.	0.1	
12/8/2022	JSY	Call with GJG re research for MSJ.	0.3	
12/8/2022	JSY	Emails re status of MSJ and related barrier list projects.	0.3	
12/8/2022	JSY	Conf. w/ GCG re status of MSJ research.	0.1	
12/8/2022	GJG	Research legal issues for partial MSJ and draft memo re: same.	3.1	
12/8/2022	GJG	Confer with JY re legal issues in partial MSJ.	0.2	
12/8/2022	GJG	Research legal issues for partial MSJ and draft memo re: same.	0.5	
12/8/2022	GJG	Revise memo re legal issues in partial MSJ.	0.6	
12/8/2022	KES	Email team re progress of barrier list project.	0.2	
12/9/2022	JSY	Emails re barrier issues.	0.2	
12/9/2022	GJG	Research legal issues for partial MSJ and draft memo re: same.	1.9	
12/9/2022	GJG	Review and revise memo re partial MSJ and send to JY.	0.8	
12/11/2022	JSY	Emails re production from Defs.	0.1	
12/12/2022	KES	Summarize issues re modified barrier list preparation and email JY re same.	0.6	
12/13/2022	GCG	Email to LW re report on assisted living staffing.	0.1	
12/13/2022	GCG	Emails to GW and JSY.	0.2	
12/13/2022	LRW	Save case facts and circulate memorandum to team.	0.6	
12/14/2022	GCG	Review edits to expert document.	0.2	
12/14/2022	GCG	Conf w/ JSY and emails to GW re same.	0.2	
12/14/2022	JSY	Conf. w/ GCG re expert issues.	0.1	
12/15/2022	GCG	Emails to JSY and GW re expert issues and meeting.	0.1	
12/16/2022	JSY	Emails re barrier list issues.	0.1	
12/19/2022	GCG	Prepare for and conduct meeting w/ GW, MJ and JSY re expert issues and plan for trial.	1.0	
12/19/2022	GCG	Follow up email re expert issues.	0.3	
12/19/2022	GCG	Confs w/ MWB and JSY re same.	0.2	
12/19/2022	JSY	Meeting with GBW, GCG, and MTJ re fees and costs issues and trial planning.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 680

SERVICES

Date	Person	Description of Services	Hours	Discount
12/19/2022	JSY	Conf. w/ GCG re fees issues.	0.1	
12/29/2022	KES	Email GCG re expert reports (os).	0.2	
1/3/2023	JSY	Conf. w/ GCG and KES separately re status of MSJ.	0.2	
1/4/2023	GCG	Conf w/ and email JSY re summary judgment.	0.1	
1/4/2023	JSY	Review emails and memos re access barriers for PSJ; draft email to GW with questions re same.	0.6	
1/5/2023	JSY	Emails re discovery platform.	0.1	
1/5/2023	KES	Update Kiteworks login.	0.1	
1/6/2023	JSY	Emails re access barriers issues.	0.1	
1/6/2023	JSY	Draft MSJ; research re same.	1.9	
1/9/2023	JSY	Emails re production of Anderson documents and barrier list issues.	0.2	
1/9/2023	KES	Review M. Johnson email re documents produced per MTC.	0.1	
1/10/2023	GCG	Conf w/ JSY re motion for summary judgment.	0.1	
1/10/2023	JSY	Draft MSJ.	0.5	
1/11/2023	JSY	Draft MSJ.	1.3	
1/11/2023	KES	Online research.	0.4	
1/11/2023	KES	Consider barrier list chart issues for motion.	0.2	
1/12/2023	GCG	Emails to AX and team re letter to class representatives seeking updates.	0.1	
1/12/2023	GCG	Email to JSY and GW re motion for summary judgment.	0.1	
1/12/2023	GCG	Conf w/ JSY re same.	0.1	
1/12/2023	JSY	Emails re meeting re access barriers issue.	0.1	
1/12/2023	JSY	Draft MSJ.	1.5	
1/12/2023	JSY	Emails re letter to class reps.	0.1	
1/12/2023	JSY	Conf. w/ GCG re MSJ.	0.1	
1/12/2023	JSY	Emails with GW re co-counseling agreement.	0.1	
1/13/2023	GCG	Conf w/ JSY re motion for summary judgment.	0.1	
1/13/2023	JSY	Emails re Bowman status.	0.1	
1/13/2023	JSY	Call with KES re access barriers project.	0.1	
1/13/2023	JSY	Meeting re MSJ and access barriers compilation.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 681

SERVICES

Date	Person	Description of Services	Hours	Discount
1/13/2023	JSY	Re-review class cert. briefing re TransUnion.	0.3	
1/13/2023	KES	Zoom meeting with co-counsel re access barriers list.	0.5	
1/13/2023	KES	Update chart re select barriers for PSJ.	1.1	
1/13/2023	KES	Review files for operative version of Defs opp to class cert; review related court orders.	0.4	
1/17/2023	JSY	Draft MPSJ.	1.1	
1/17/2023	JSY	Edit letter to named class reps.	0.2	
1/17/2023	KES	Continue drafting spreadsheet re selected barriers for potential inclusion in PSJ.	0.8	
1/18/2023	GCG	Revise letters to class representatives re status of case.	0.1	
1/18/2023	GCG	Conf w/ and emails to JSY and AX re same.	0.1	
1/18/2023	JSY	Draft MPSJ.	0.5	
1/18/2023	JSY	Emails and conf. re letter to named plaintiffs.	0.2	
1/18/2023	JSY	Draft MPSJ.	1.0	
1/18/2023	AX	Email correspondence with team re letters to named plaintiffs.	0.3	
1/18/2023	KES	Continue chart of select barriers for PSJ.	0.8	
1/19/2023	JSY	Conf. w/ AX re letters to class reps.	0.1	
1/19/2023	JSY	Messages re letters to class reps.	0.1	
1/19/2023	AX	Finalize and send update letters to plaintiffs, including call with JSY.	0.8	
1/20/2023	JSY	Emails re factual information from Sunrise amicus brief relevant to this case.	0.1	
1/20/2023	JSY	Emails re letters to class representatives.	0.1	
1/20/2023	JSY	Draft and research MPSJ.	1.8	
1/20/2023	JSY	Emails re MPSJ issue re access barriers.	0.1	
1/20/2023	AX	Email correspondence re class rep update letter (.1); send update letter to Heather Fischer (.2); email correspondence to BKD Alhambra resident (.2).	0.5	
1/23/2023	GCG	Conf w/ JSY re motion for summary judgment.	0.1	
1/23/2023	JSY	Emails re categories of access barriers for MPSJ.	0.1	
1/23/2023	JSY	Emails re case status.	0.1	
1/23/2023	JSY	Draft and edit MPSJ; emails with GCG re same.	1.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 682

SERVICES

Date	Person	Description of Services	Hours	Discount
1/24/2023	GCG	Review and analyze draft MSJ.	0.7	
1/24/2023	GCG	Conf w/ and email to JSY re legal research needed.	0.2	
1/24/2023	JSY	Review relevant 9th Cir. case and edit MPSJ accordingly.	0.5	
1/24/2023	JSY	Emails re MPSJ.	0.1	
1/25/2023	GCG	Review and revise draft MSJ.	0.5	
1/25/2023	GCG	Confs w/ JSY re revisions and further legal research.	0.5	
1/25/2023	JSY	Meeting with GCG re MPSJ and follow up call re same.	0.8	
1/25/2023	JSY	Research re ADAAG requirements.	0.2	
1/26/2023	GCG	Emails w/ MJ and KES re MSJ re client outreach.	0.2	
1/26/2023	JSY	Emails re MSJ.	0.1	
1/27/2023	GCG	Legal research for MSJ.	0.1	
1/27/2023	GCG	Email w/ GW and conf w/ JSY re meeting.	0.1	
1/27/2023	JSY	Conf. w/ GCG re meeting with co-counsel.	0.1	
1/27/2023	JSY	Emails re meeting with co-counsel.	0.1	
1/30/2023	EG	Review and respond to emails re costs advanced for experts.	0.4	
1/30/2023	GCG	Legal research for MSJ.	0.1	
1/30/2023	GCG	Meet w/ GW, MJ and JSY re MSJ legal research and expert costs.	0.5	
1/30/2023	GCG	Review and analyze expert costs.	0.2	
1/30/2023	GCG	Conf w/ MWB and JSY and emails to partners and MJ and GW re same.	0.2	
1/30/2023	JSY	Meeting with GW, MTJ, GCG re MPSJ.	0.8	
1/30/2023	JSY	Draft agenda for meeting with co-counsel; emails with GCG re same.	0.4	
1/30/2023	JSY	Emails re correspondence with Marks.	0.1	
1/30/2023	JSY	Call with GCG re costs issue.	0.1	
1/30/2023	MWB	Email with GCG - partners regarding costs.	0.2	
1/30/2023	MWB	Confer with GCG regarding costs and case status.	0.3	
1/30/2023	KES	Prepare letter exhibit documents.	0.3	
1/30/2023	LRW	File, format, and distribute legal research per GG.	0.8	
1/31/2023	JSY	Emails re status of barrier analysis project.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/31/2023	JSY	Analyze privilege log and documents related to Anderson; draft email to team re same.	0.7	
1/31/2023	SJR	Emails.	0.2	
1/31/2023	AX	Review email correspondence re MPSJ.	0.1	
1/31/2023	KES	Continue drafting chart of selected barriers for possible inclusion in PSJ.	2.0	
2/1/2023	GCG	Confs w/ SJR, JSY, EG and MWB re plan for trial and staffing analysis.	1.0	
2/1/2023	GCG	Review and analyze drafts agreement.	0.3	
2/1/2023	GCG	Review and analyze staffing analysis costs.	0.1	
2/1/2023	GCG	Email GW re same.	0.1	
2/1/2023	JSY	Emails re access reports and privilege log.	0.1	
2/1/2023	JSY	Conf. w/ GCG re costs and case status.	0.1	
2/1/2023	SJR	Emails and conference with GG re status and path forward.	1.2	
2/2/2023	GCG	Prepare for and conduct call w/ GW re staffing analysis and class cert motion.	0.5	
2/2/2023	GCG	Conf w/ JS re same.	0.2	
2/2/2023	GCG	Revise letter to DM re same.	0.2	
2/2/2023	JSY	Conf. w/ GCG re case status.	0.1	
2/2/2023	SJR	Emails with GG.	0.1	
2/2/2023	KES	Revise attachment to Marks letter.	0.2	
2/3/2023	GCG	Email w/ KES and AX re putative class member denied ADA accommodations.	0.1	
2/3/2023	GCG	Revise and send letter to DM re staffing analysis for class cert motion.	0.1	
2/3/2023	JSY	Emails re SJ declarations.	0.1	
2/3/2023	AX	Email correspondence re putative class member at Brookhurst.	0.2	
2/3/2023	KES	Telephone conference with relative of Brookdale resident and email to team summarizing call.	0.5	
2/6/2023	GCG	Conf with JSY and email MH re draft discovery request.	0.2	
2/6/2023	JSY	Emails re RFP draft and team meeting.	0.1	
2/6/2023	JSY	Conf. w/ GCG re RFPs.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 684

SERVICES

Date	Person	Description of Services	Hours	Discount
2/6/2023	JSY	Review RFPs.	0.1	
2/7/2023	JSY	Edit MSJ.	1.0	
2/8/2023	GCG	Conf w/ JSY re motion for summary judgment.	0.1	
2/8/2023	JSY	Conf. and emails re RFP and team meeting.	0.2	
2/8/2023	JSY	Emails re barrier list project.	0.1	
2/8/2023	KES	Email LW re barrier list chart assignment and review and provide documents re same.	0.8	
2/8/2023	LRW	Review master new constructions facility list in preparation for meeting with JY and KS.	1.1	
2/9/2023	KES	Meet with LW re barrier list project for summary judgment; review docs re same and follow up questions re same.	1.0	
2/9/2023	LRW	Meeting with KES to discuss strategy for constructing Brookdale barrier list.	0.8	
2/9/2023	LRW	Partially compile barrier list for Brookdale.	2.9	
2/10/2023	LRW	Partially compile new construction barrier list.	0.5	
2/13/2023	LRW	Partially compile barriers list for new construction Brookdale facilities.	2.1	
2/14/2023	JSY	Emails re call from family member of resident.	0.1	
2/14/2023	AX	Call with putative class member at Brookhurst and email correspondence with team re same.	0.5	
2/14/2023	KES	Update barrier list for four facilities reviewed by Anderson to include all relevant SJ barriers and begin gathering photos for same.	2.3	
2/14/2023	LRW	Partially compile barriers list for new construction Brookdale facilities.	1.8	
2/15/2023	KES	Gather and organize photos relating to barriers for SJ for four facilities.	2.2	
2/16/2023	GCG	Conf w/ AX re motion for summary judgment.	0.1	
2/16/2023	LRW	Partially compile barrier list for new construction facilities.	5.2	
2/17/2023	GCG	Meet w/ co-counsel re planning motion for summary judgment and serving additional discovery.	0.7	
2/17/2023	GCG	Email w/ JSY re discovery requests.	0.1	
2/17/2023	JSY	Team meeting with co-counsel re status.	0.7	
2/17/2023	JSY	Conf. w/ AX re RFP and next steps after meeting.	0.1	
2/17/2023	JSY	Prep for team meeting; review access barrier spreadsheets.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/17/2023	JSY	Edit RFPs; emails re same.	0.4	
2/17/2023	AX	Team meeting, related call with JSY, and email correspondence with team re notes.	0.9	
2/17/2023	KES	Zoom meeting with co-counsel re discovery and summary judgment.	0.8	
2/17/2023	KES	Emails with R. Steyer re barrier lists for summary judgment.	0.2	
2/17/2023	KES	Revise barrier list chart for four facilities.	0.3	
2/17/2023	LRW	Partially compile barrier list for new construction facilities.	1.9	
2/21/2023	GCG	Conf w/ JSY re revisions to RFPs.	0.1	
2/21/2023	JSY	Conf. w/ GCG re discovery.	0.1	
2/21/2023	LRW	Partially compile barrier list for new construction facilities.	1.3	
2/22/2023	GCG	Review Brookdale 2022 financial results for use in discovery.	0.1	
2/22/2023	JSY	Review and edit RFPs and meet and confer letter; emails re same.	0.8	
2/22/2023	LRW	Compile and finalize barrier list for Brookdale new construction facilities.	1.8	
2/23/2023	JSY	Emails re RFPs and meet and confer letter.	0.2	
2/23/2023	JSY	Edit MPSJ.	1.1	
2/23/2023	KES	Confer LW re barrier list chart and photos.	0.2	
2/23/2023	LRW	Partially pull and organize photographs from declarations corresponding to photographs referenced in new construction barrier list.	2.8	
2/23/2023	LRW	Pull, formate, save, and circulate case fact per GG.	0.4	
2/24/2023	JSY	Edit MPSJ; research re same.	1.0	
2/24/2023	BBK	Reviewing AX memo re 2/17 co-counsel meeting on partial MSJ and additional discovery.	0.1	
2/24/2023	LRW	Partially compile and organize photographs corresponding to barrier list for new construction facilities.	2.8	
2/27/2023	GCG	Review emails to MJ and team re revisions to RFPs and class list.	0.2	
2/27/2023	GCG	Email putative class member re status.	0.1	
2/27/2023	GCG	Legal research re recent decision.	0.1	
2/27/2023	GCG	Begin drafting letter to PM re expert analysis.	0.1	
2/27/2023	JSY	Emails re order in similar case.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2023	JSY	Review and edit new version of RFPs; emails re same.	0.3	
2/27/2023	JSY	Emails re access barriers analysis.	0.2	
2/27/2023	JSY	Edit MPSJ; emails re research for same.	0.8	
2/27/2023	AX	Review team correspondence re discovery letter brief, MSJ research project.	0.3	
2/27/2023	LRW	Partially compile and organize photographs corresponding to barrier lists for new construction facilities.	2.0	
2/28/2023	JSY	Emails re declarant contact info.	0.1	
2/28/2023	BBK	Reviewing M. Johnson draft meet and confer letter seeking supplemental discovery responses from Ds.	0.1	
2/28/2023	LRW	Compile and finalize photograph collections corresponding to barrier list compilations for new construction facilities.	5.7	
2/28/2023	LRW	Confer with KES re strategy for barrier list compilations for new construction facilities.	0.1	
3/1/2023	JSY	Review and edit M+C letter.	0.4	
3/1/2023	JSY	Additional emails re M+C letter.	0.1	
3/1/2023	LRW	Review photograph compilations for new construction barrier lists and refine contents.	1.2	
3/2/2023	GCG	Revise letter to DM re staffing analysis.	0.1	
3/2/2023	GCG	Confs w/ JSY and BBK re motion for summary judgment.	0.1	
3/2/2023	JSY	Conf. w/ GCG re status of discovery requests and M+C letters.	0.1	
3/2/2023	JSY	Conf. w/ KES and LW re time to speak re access barriers project.	0.1	
3/2/2023	JSY	Meeting with KES and LW re access barriers project.	0.4	
3/2/2023	KES	Meet with JY and LW re revisions to barrier list and selection of photos; prepare examples for same.	0.8	
3/2/2023	LRW	Prepare for, draft memorandum email for, and attend meeting with JY and KES to discuss strategy for new construction facility barrier list compilation and presentation.	1.1	
3/3/2023	GCG	Revise and send letter to DM re staffing analysis.	0.2	
3/3/2023	LRW	Make revisions to new construction facility barrier lists per instructions from JY and KES.	1.1	
3/6/2023	GCG	Emails to MJ and MJ re meet and confer re discovery dispute.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 687

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2023	BBK	Reviewing M. Johnson - M. Jacobsen comm'ns re telephonic M&C on Pls' request that Ds' provide supplemental responses to outstanding discovery requests.	0.1	
3/7/2023	JSY	Conf. w/ LW re access barriers project.	0.1	
3/7/2023	BBK	Reviewing R. Steyer letter to Ds seeking production of resident files under Health & Safety Code 1569.269 and comm'ns w/ M. Jacobsen re same.	0.1	
3/7/2023	LRW	Further revise new construction barrier list and photography compilations per JY instructions.	1.9	
3/8/2023	JSY	Emails re new similar case.	0.1	
3/9/2023	GCG	Review defendants' filings re motion to stay.	0.1	
3/9/2023	GCG	Conf w/ JSY and emails to team re same.	0.1	
3/9/2023	JSY	Conf. w/ BBK re Title III modifications request research and order.	0.1	
3/9/2023	JSY	Emails re order denying admin motion as moot.	0.1	
3/9/2023	JSY	Conf. w/ GCG re team meeting and research for MPSJ.	0.1	
3/9/2023	JSY	Review recent filings re motion to stay discovery.	0.2	
3/9/2023	JSY	Emails re filings re motion to stay discovery.	0.1	
3/9/2023	BBK	Conferring w/ JSY re legal research for partial MSJ.	0.1	
3/9/2023	BBK	Reviewing Court Order denying motion to continue class cert hearing as moot, and Ds' two filings regarding pending motion to stay discovery prior to decision on class cert.	0.1	
3/9/2023	AX	Legal research on written policies for MSJ.	1.8	
3/10/2023	GCG	Meet w/ co-counsel and RBGG team to discuss defendants' filings, meet and confer plan and motion for summary judgment.	0.3	
3/10/2023	GCG	Review court order granting stay.	0.1	
3/10/2023	GCG	Conf w/ JSY and email to team re same.	0.1	
3/10/2023	JSY	Call with AX re research for MPSJ.	0.3	
3/10/2023	JSY	Team meeting.	0.3	
3/10/2023	JSY	Conf. w/ GCG re order on motion to stay discovery.	0.1	
3/10/2023	JSY	Emails re order on motion to stay discovery.	0.1	
3/10/2023	BBK	RBGG team meeting on case tasks.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 688

SERVICES

Date	Person	Description of Services	Hours	Discount
3/10/2023	BBK	Reviewing Court Order granting Ds' motion to stay discovery pending class cert decision; conferring w/ RBGG team and co-counsel re same.	0.1	
3/10/2023	AX	Meeting with team re case tasks, strategy.	0.3	
3/10/2023	AX	Call with JSY re MSJ research issues.	0.3	
3/10/2023	AX	Review team correspondence re class cert motion, recent filings, and granting motion to stay discovery.	0.3	
3/10/2023	LRW	Meeting with co-council and RBGG team to discuss case strategy and barrier list compilation.	0.4	
3/10/2023	LRW	Combine KES and LRW barrier list compilations and corresponding photographs, revise and send to JY for review.	2.4	
3/14/2023	JSY	Conf. w/ BBK re MPSJ.	0.1	
3/14/2023	JSY	Emails re MPSJ research.	0.1	
3/14/2023	AX	MSPJ research re policies as evidence of existing practices; email correspondence to team re same.	2.5	
3/15/2023	BBK	Reviewing AX report re legal research on reliance on written policies to establish company's policy for purpose of MSJ.	0.1	
3/15/2023	LRW	Make revisions to barrier list compilations and corresponding photographs per JY and KES instruction.	1.1	
3/17/2023	GCG	Meet w/ co-counsel re motion for summary judgment and discovery stay.	0.7	
3/17/2023	JSY	Emails re meeting.	0.1	
3/17/2023	JSY	Team meeting with co-counsel.	0.7	
3/17/2023	JSY	Emails re discovery memo.	0.1	
3/17/2023	BBK	Monthly co-counsel meeting on case strategy and tasks.	0.6	
3/17/2023	AX	Meeting with team re MSJ, class cert, discovery issues.	0.6	
3/17/2023	LRW	Attend monthly cocounsel meeting to discuss urgent case issues.	0.6	
3/23/2023	BBK	Conferring w/ RBGG team re co-counsel's draft discovery plan.	0.1	
3/23/2023	AX	Review TC discovery memo; email correspondence with team re same.	0.5	
3/27/2023	GCG	Review court order re redactions.	0.1	
3/27/2023	GCG	Conf w/ JSY and emails to MJ and ER re same.	0.1	
3/27/2023	JSY	Emails re order re sealing.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 689

SERVICES

Date	Person	Description of Services	Hours	Discount
3/27/2023	BBK	Conferring w/ co-counsel and RBGG team re addressing court's 3/27 order on Ds' under seal filings.	0.1	
3/27/2023	AX	Email correspondence with team re court order; review docket re same.	0.6	
3/27/2023	KES	Emails with team re court order re redacted documents.	0.3	
3/28/2023	GCG	Review defendants' filing re redactions.	0.2	
3/28/2023	GCG	Email to GW and MJ re same.	0.1	
3/28/2023	BBK	Reviewing Ds' filing IRT 3/27 court order on Ds' under seal filings.	0.1	
3/28/2023	KES	Download and circulate pleadings.	0.2	
3/29/2023	BBK	Legal research for partial MSJ on BD's violation of rule against surcharge for accommodations.	0.8	
3/30/2023	GCG	Review and analyze Judge Gillian class certification order.	1.1	
3/30/2023	GCG	Meet w/ co-counsel re next steps.	0.8	
3/30/2023	GCG	Confs w/ JSY, SJR and KES re same.	0.7	
3/30/2023	GCG	Emails to GW, MJ and team re Rule 23(f) petition.	0.5	
3/30/2023	GCG	Review and analyze sealing opinion.	0.3	
3/30/2023	GCG	Email AX re same.	0.2	
3/30/2023	GCG	Research and draft letters and emails to clients and witnesses re decision.	1.0	
3/30/2023	GCG	Revise summary of decision.	0.5	
3/30/2023	JSY	Two calls with GCG re class certification order.	0.3	
3/30/2023	JSY	Team meeting re class cert order.	0.6	
3/30/2023	JSY	Review class cert order; emails re same.	1.5	
3/30/2023	MWB	Emails regarding class certification decision.	0.1	
3/30/2023	SJR	Email from GG and telephone conference re decision and next steps.	0.3	
3/30/2023	BBK	Reviewing Court's Omnibus Order on parties' motions to seal.	0.1	
3/30/2023	BBK	Reviewing/drafting analysis for team on Class Cert Order.	1.1	
3/30/2023	BBK	Meeting w/ co-counsel and RBGG team re addressing Class Cert Order.	0.6	
3/30/2023	BBK	Emailing w/ team post-meeting re addressing Class Cert Order; reviewing/commenting on draft letter to clients.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 690

SERVICES

Date	Person	Description of Services	Hours	Discount
3/30/2023	BBK	Reviewing unredacted pages from Class Cert Order on BD's staffing method.	0.1	
3/30/2023	AX	Meeting with team re strategy following class certification order.	0.5	
3/30/2023	AX	Draft letter to named plaintiffs re class certification order; email correspondence with team re same.	0.8	
3/30/2023	AX	Review draft statement; email correspondence to team re same.	0.3	
3/30/2023	AX	Read class cert order, review prior filings, and related email correspondence with team re same and strategy for 23f.	3.0	
3/30/2023	FGL	(Billing Judgment) Conflicts check 2023-03-30 GCGSUPP supplemental 1457-1 addtl opposing counsel and email to GCG re previous run of same.	0.0	0.2
3/30/2023	KES	Download and circulate pleadings.	0.2	
3/30/2023	KES	Calendar deadlines and review orders re same.	0.3	
3/30/2023	KES	Review emails re court order.	0.2	
3/31/2023	GCG	Continued review and analyze Judge Gillian opinion.	0.5	
3/31/2023	GCG	Prepare for and conduct meeting w/ co-counsel to plan 23f petition.	1.0	
3/31/2023	GCG	Review and revise outline of 23f petition.	0.3	
3/31/2023	GCG	Confs w/ and emails to JSY re same and re letters to clients re class cert order.	0.3	
3/31/2023	GCG	Draft email to team re same.	0.3	
3/31/2023	JSY	Team meeting re next steps after class cert order.	1.1	
3/31/2023	JSY	Edit class rep. letter; multiple emails re same and review final version of same.	0.8	
3/31/2023	JSY	Edit outline; emails and conf. re same.	0.7	
3/31/2023	JSY	Create 23f document and research length and formatting rules; emails re same.	0.2	
3/31/2023	JSY	Emails re class cert order.	0.2	
3/31/2023	MWB	Review class certification order.	0.5	
3/31/2023	BBK	Conferring w/ team re letters to Pls re Class Cert Order and complying w/ Court's Omnibus Order on sealing.	0.1	
3/31/2023	BBK	Reviewing GW initial list of issues in class cert order.	0.2	
3/31/2023	BBK	Meeting w/ co-counsel re Rule 26(f) petition.	1.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 691

SERVICES

Date	Person	Description of Services	Hours	Discount
3/31/2023	BBK	Drafting comments on GW list of issues in class cert order and re: proposed outline for Rule 26(f) petition; conferring w/ RBGG team re same.	0.8	
3/31/2023	BBK	Conferring w/ RBGG team and GW post-meeting re Rule 26(f) petition.	0.1	
3/31/2023	AX	Team meeting re strategy for 23f petition.	1.1	
3/31/2023	AX	Review docket and related documents re sealing issue.	0.5	
3/31/2023	AX	Review outline for 23f and revise; email correspondence with team re same.	0.6	
3/31/2023	AX	Finalize letters to named plaintiffs; email correspondence and call with JSY re same.	0.4	
3/31/2023	AX	Send emails to named plaintiffs re class certification decision.	0.5	
3/31/2023	LRW	Partially attend cocounsel meeting to discuss strategy re: class cert decision.	0.9	
4/1/2023	GCG	Emails to GW, JSY and team re theme for Rule 23(f) petition.	0.1	
4/1/2023	GCG	Review MWB email re deaf protections at assisted living.	0.1	
4/1/2023	JSY	Emails re 23f petition.	0.1	
4/1/2023	BBK	Conferring w/ G. Wallace and RBGG team re FRCP 23(f) petition.	0.1	
4/1/2023	AX	Review team email correspondence re class certification.	0.1	
4/2/2023	AX	Correspondence with Bernie Jestrabek-Hart re class certification order.	0.1	
4/3/2023	GCG	Review and revise outline of Rule 23(f) petition.	0.5	
4/3/2023	GCG	Meet w/ co-counseling team re same.	1.3	
4/3/2023	GCG	Conf w/ and emails to JSY and RBGG team re further legal research needed.	0.4	
4/3/2023	GCG	Email to GW re notes of meeting and next draft.	0.2	
4/3/2023	JSY	Team meeting re next steps with 23f petition.	1.4	
4/3/2023	JSY	Conf. w/ AX re 23f petition.	0.2	
4/3/2023	JSY	Review outline and initial draft of 23f and review 23f research.	0.5	
4/3/2023	JSY	Emails re Defs' transportation exhibit.	0.1	
4/3/2023	BBK	Reviewing G. Wallace outline of FRCP 23(f) petition and rough draft of access barrier section.	0.3	
4/3/2023	BBK	Meeting w/ co-counsel re FRCP 23(f) petition.	1.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 692

SERVICES

Date	Person	Description of Services	Hours	Discount
4/3/2023	BBK	Meeting w/ RBGG team re FRCP 23(f) petition.	0.2	
4/3/2023	BBK	Emailing w/ RBGG team and co-counsel re FRCP 23(f) petition.	0.1	
4/3/2023	BBK	Emailing w/ RBGG team re filing unredacted class cert motion and reply brief per Court's Omnibus sealing order.	0.1	
4/3/2023	AX	Meeting with GW, MJ, BU, JSY, GCG, BBK, RS, TC re 23f motion and strategy for same.	1.0	
4/3/2023	AX	Meeting with GCG, BBK, JSY re tasks for 23f petition and research issues.	0.4	
4/3/2023	AX	Call with JSY re drafting 23f petition, other case tasks.	0.2	
4/3/2023	AX	Call with Bernie Jestrabek Hart re class certification decision; email to team re same.	0.4	
4/3/2023	AX	Email to KES re filing unredacted motion, reply.	0.1	
4/3/2023	AX	Research 23f filing issues and draft memo re same.	1.0	
4/3/2023	KES	Review files and emails with team re definitive version of defs opposition.	0.3	
4/3/2023	KES	Remove redactions marked from briefs to be re-filed in unredacted form per court order.	0.6	
4/4/2023	GCG	Legal and factual research for Rule 23(f) petition.	0.5	
4/4/2023	GCG	Conf w/ JSY and emails to team re same.	0.4	
4/4/2023	GCG	Review and analyze AX memo re Rule 23(f) requirements.	0.1	
4/4/2023	GCG	Email to Ax and team re communications with class representatives.	0.2	
4/4/2023	JSY	Draft sections of 23f petition.	3.9	
4/4/2023	JSY	Calls with class reps ML and JA; email memo to team re same.	0.5	
4/4/2023	JSY	Multiple conf. w/ GCG, BBK, AX re Rule 23f petition.	0.6	
4/4/2023	BBK	Reviewing/responding to GW email re 26(f) petition section on district court's order.	0.2	
4/4/2023	BBK	Analyzing named Plaintiff cert decls (Carlson, Lindstrom) for supporting facts for 23(f) petition.	0.4	
4/4/2023	BBK	Phone call w/ J. Carlson re class cert order.	0.2	
4/4/2023	BBK	Emailing/texting with P Lindstrom re class cert order.	0.2	
4/4/2023	BBK	Meeting w/ JSY re 23(f) petition.	0.2	
4/4/2023	BBK	Phone call w/ P Lindstrom re class cert order.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 693

SERVICES

Date	Person	Description of Services	Hours	Discount
4/4/2023	BBK	Reviewing AX memo re procedural and filing requirements for 23(f) petition.	0.1	
4/4/2023	BBK	Researching ADA legislative history for 23(f) petition; conferring w/ JSY/GCG re same.	0.6	
4/4/2023	BBK	Drafting 23(f) Petition section on district court's order.	1.1	
4/4/2023	BBK	Conferring w/ JSY/AX re whether redactions and under seal filing necessary for 23(f) petition.	0.1	
4/4/2023	AX	Call with KES re filing 23f petition in Ninth Circuit via electronic CM ECF.	0.5	
4/4/2023	AX	Draft memo re filing 23f petition, including procedural issues, filing fee, service, time to file, and other questions.	1.0	
4/4/2023	AX	Research and draft memo re Rule 23f requirements.	0.5	
4/5/2023	GCG	Review and analyze AX Rule 23 research.	0.1	
4/5/2023	GCG	Email GW and team re same and re potential amici.	0.1	
4/5/2023	GCG	Review and revise draft Rule 23(f) petition.	0.6	
4/5/2023	GCG	Conf w/ JSY and email RBGG team re same.	0.2	
4/5/2023	GCG	Confs w/ KEs and JSY re sealing deadline.	0.1	
4/5/2023	GCG	Review MJ email re joint statement.	0.1	
4/5/2023	GCG	Emails to GW and team re timing of drafts and evidence stricken by court.	0.1	
4/5/2023	JSY	Draft sections of 23f petition; multiple emails and conf. re same.	7.4	
4/5/2023	JSY	Further emails re 23f petition.	0.2	
4/5/2023	JSY	Review GCG edits to 23f statement of facts.	0.2	
4/5/2023	BBK	Emailing w/ KES re checking file for research into ADA legislative history.	0.1	
4/5/2023	BBK	Conferring w/ JSY and AX re drafting 23(f) petition.	0.2	
4/5/2023	BBK	Conferring w/ RBGG team and co-counsel re filing unredacted briefs.	0.1	
4/5/2023	BBK	Researching/drafting section of 23(f) petition on dist court order.	2.3	
4/5/2023	BBK	Conferring w/ co-counsel re 23(f) petition.	0.2	
4/5/2023	AX	Email correspondence with team re filing unredacted brief and reply.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/5/2023	AX	Research on history of Rule 23 and plaintiffs' class actions; draft email to team re same.	1.5	
4/5/2023	AX	Draft procedural history section of 23f petition.	1.2	
4/5/2023	KES	Email to team re unredacted version of briefs.	0.1	
4/6/2023	GCG	Emails to JSY, GW, MJ and MJ re filing unredacted motion papers.	0.2	
4/6/2023	GCG	Conf w/ GW and emails to JSY re overall strategy and approach to Rule 23(f).	0.4	
4/6/2023	JSY	Emails re unredacted copies of briefs.	0.1	
4/6/2023	JSY	Conf. w/ AX re 23f petition.	0.4	
4/6/2023	JSY	Emails re amicus brief.	0.2	
4/6/2023	JSY	Edit 23f; review versions of intro re same; emails re same.	3.9	
4/6/2023	JSY	Team meeting re 23f petition.	0.6	
4/6/2023	JSY	Research page limit rules; emails re same.	0.2	
4/6/2023	BBK	Reviewing emails w/ Pls and Ds' counsel re filing joint statement and unredacted class cert briefing per Court's Order.	0.1	
4/6/2023	BBK	Conferring w/ RBGG team and co-counsel re amicus brief ISO Rule 23(f) petition.	0.2	
4/6/2023	BBK	Conferring w/ co-counsel re draft sections of Rule 23(f) petition.	0.1	
4/6/2023	BBK	Reviewing JSY draft sections of Rule 23(f) petition and GW draft intro for same.	0.4	
4/6/2023	BBK	Meeting w/ co-counsel re Rule 23(f) petition.	0.5	
4/6/2023	BBK	Conferring w/ RBGG team re Rule 23(f) petition post-meeting.	0.2	
4/6/2023	AX	Email correspondence with team re update to memo about Rule 23f filing procedures, updated meeting time.	0.6	
4/6/2023	AX	Meeting with team re 23f petition.	0.6	
4/6/2023	AX	Email correspondence and related research re 23f amicus.	0.4	
4/6/2023	AX	Review briefs in preparation for filing unredacted versions.	0.2	
4/6/2023	KES	Team Zoom re 23F petition.	0.5	
4/6/2023	KES	Download and circuate joint statement with unredacted briefs.	0.2	
4/7/2023	GCG	Emails to GW and JSY re revisions to 23(f) petition and overall case strategy.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/7/2023	GCG	Email to RS re zoom meeting with putative class member/declarant.	0.1	
4/7/2023	JSY	Messages and emails re revisions to 23f.	0.3	
4/7/2023	JSY	Conf. w/ GBW re plan for 23f.	0.3	
4/7/2023	JSY	Edit 23f petition and multiple emails and messages re same.	4.7	
4/7/2023	JSY	Emails re plan for citations for 23f.	0.1	
4/7/2023	BBK	Conferring w/ JSY and AX re revisions to 23(f) petition.	0.3	
4/7/2023	BBK	Emailing w/ co-counsel re revisions to 23(f) petition.	0.2	
4/7/2023	BBK	Reviewing JSY's revised/consolidated draft Rule 23(f) petition.	0.6	
4/7/2023	AX	Review email correspondence from team re 23f petition; IM correspondence with team re same.	0.5	
4/8/2023	JSY	Messages re TransUnion arguments in 23f petition.	0.2	
4/9/2023	GCG	Emails to MJ, GW and JY re further revisions to 23(f) petition.	0.1	
4/9/2023	JSY	Edit 23f petition and fill in citations; emails re same.	0.9	
4/10/2023	GCG	Review and comment on draft 23(f) petition.	0.4	
4/10/2023	GCG	Meet w/ co-counseling team re same.	1.0	
4/10/2023	GCG	Review Brookdale notice of appearance.	0.1	
4/10/2023	GCG	Meet w/ Impact Fund and DREDF re potential amicus support.	0.5	
4/10/2023	GCG	Email to DRA re same.	0.2	
4/10/2023	GCG	Emails to MJ and team re cite-checking and citation issues.	0.3	
4/10/2023	JSY	Review revised version of 23f; emails re same.	0.4	
4/10/2023	JSY	Team meeting re 23(f) petition.	0.8	
4/10/2023	JSY	Multiple calls with GCG re 23(f) petition and amici.	0.4	
4/10/2023	JSY	Two meetings with potential amici organizations.	1.0	
4/10/2023	JSY	Emails re meetings with potential amici.	0.4	
4/10/2023	JSY	Review and edit 23(f) petition and multiple emails re same.	2.1	
4/10/2023	BBK	Meeting w/ co-counsel re 23(f) petition.	0.8	
4/10/2023	BBK	Reviewing updated draft 23(f) petition.	0.5	
4/10/2023	BBK	Conferring w/ co-counsel and RBGG team re revisions to 23(f) petition.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2023	AX	Team meeting re 23f petition.	0.8	
4/10/2023	AX	Review 23f petition draft.	0.5	
4/10/2023	KES	Download and circulate pleadings.	0.2	
4/11/2023	GCG	Meet w/ potential DRA amici.	0.4	
4/11/2023	GCG	Review and revise draft 23(f) petition.	0.5	
4/11/2023	GCG	Conf w/ JSY re drafting of CMC statement and revisions to Rule 23(f) petition.	0.3	
4/11/2023	GCG	Meet w/ co-counsel and RBGG team re overall strategy and approach to Rule 23(f) petition and CMC statement.	0.8	
4/11/2023	GCG	Review and revise draft CMC statement.	0.4	
4/11/2023	GCG	Emails w/ potential amici re background materials.	0.2	
4/11/2023	JSY	Emails re cite checking.	0.2	
4/11/2023	JSY	Team meeting.	0.5	
4/11/2023	JSY	Review edited 23f petition; multiple emails and messages re citations for same.	0.5	
4/11/2023	JSY	Conf. w/ KES re filing 23f.	0.2	
4/11/2023	JSY	Prepare CMC statement; conf. w/ GCG re same and emails re same.	2.0	
4/11/2023	JSY	Revise CMC statement; emails re same.	0.5	
4/11/2023	BBK	Conferring w/ team re legal and record cite-checking 23(f) petition.	0.1	
4/11/2023	BBK	Conferring w/ team re drafting CMC statement.	0.1	
4/11/2023	BBK	Conducting record cite-check of 23(f) petition; conferring w/ JSY and BU re same.	5.3	
4/11/2023	AX	Review email correspondence from team re 23f petition.	0.3	
4/11/2023	KES	Download and circulate pleadings.	0.1	
4/12/2023	GCG	Confs w/ JSY re Rule 23(f) petition revisions and CMC statement.	0.3	
4/12/2023	GCG	Email w/ BBK and JSY re legal research for petition.	0.3	
4/12/2023	GCG	Review and revise petition.	0.3	
4/12/2023	GCG	Review and revise CMC statement.	0.5	
4/12/2023	GCG	Meet w/ co-counseling team re finalizing petition and CMC statement.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2023	GCG	Emails to GW, MJ and JSY re further revisions and plan for filing.	0.4	
4/12/2023	JSY	Conf. two times w/ GCG re CMC statement and 23(f) petition.	0.3	
4/12/2023	JSY	Edit CMC statement; emails re same.	0.4	
4/12/2023	JSY	Review 23(f) petition and emails re various issues re same.	0.6	
4/12/2023	JSY	Team meeting re 23(f) petition and CMC.	0.6	
4/12/2023	JSY	Edit CMC statement; emails re same.	0.4	
4/12/2023	JSY	Review and edit 23(f) petition; multiple emails and conf re same.	3.4	
4/12/2023	BBK	Responding to G. Wallace query re: # of DSS citations directly related to caregiver staffing for inclusion in 23(f) petition.	0.3	
4/12/2023	BBK	Emailing w/ JSY and GCG re key points for 23(f) petition.	0.3	
4/12/2023	BBK	Meeting w/ co-counsel re 23(f) petition and CMC Statement.	0.6	
4/12/2023	BBK	Reviewing JSY draft and revised CMC statement; conferring w/ team re same.	0.6	
4/12/2023	BBK	Reviewing GW's revised draft 23(f) petition shared in advance of team meeting.	0.3	
4/12/2023	BBK	Conferring w/ team re further revisions and record citations for 23(f) petition; adding to same.	0.7	
4/12/2023	KES	Review emails re petition for permission to appeal and plan for efiling.	0.2	
4/13/2023	GCG	Further revisions to Rule 23(f) petition.	0.2	
4/13/2023	GCG	Further revisions to CMC statement.	0.1	
4/13/2023	GCG	Emails w/ potential amici.	0.1	
4/13/2023	GCG	Confs w/ JSY and KES and emails to team re filing Rule 23(f).	0.3	
4/13/2023	GCG	Email to JSY and defendants re CMC statement.	0.1	
4/13/2023	GCG	Meet w/ co-counseling team re Rule 23(f) petition.	0.5	
4/13/2023	JSY	Edit and finalize draft Joint CMC statement; emails re same.	0.7	
4/13/2023	JSY	Team meeting re 23(f) petition.	0.4	
4/13/2023	JSY	Edit, finalize, and file 23(f) petition; multiple emails and conf. re same.	4.5	
4/13/2023	BBK	Reviewing JSY, GW, and MJ revisions to final draft 23(f) petition; correcting record cites in same.	0.6	
4/13/2023	BBK	Meeting w/ co-counsel re finalizing/filing 23(f) petition.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/13/2023	BBK	Reviewing revised CMC Statement.	0.2	
4/13/2023	BBK	Conferring w/ team re finalizing/filing 23(f) petition.	0.3	
4/13/2023	AX	Review draft CMC statement.	0.3	
4/13/2023	AX	Review team correspondence re 23f petition.	0.4	
4/13/2023	KES	Brief review of Petition for Permission to Appeal, revise certificate of service, email serve and efile petition; circulate confirmation of receipt to team.	1.0	
4/13/2023	KES	Prepare hard copy petition and serve opposing counsel via mail.	0.8	
4/14/2023	EG	Calls and emails re amicus statement re 23-f motion.	0.4	
4/14/2023	GCG	Confs w/ and emails to JSY re potential reply, 23(f) procedures and revision retainer agreement.	0.5	
4/14/2023	GCG	Conf w/ CC and emails to CC and team re amicus in support of Rule 23(f) petition.	0.3	
4/14/2023	GCG	Emails to GW re same and re district court opinion.	0.2	
4/14/2023	GCG	Conf w/ and emails to GW re approach to additional plaintiffs and amending TAC.	0.5	
4/14/2023	GCG	Meet by zoom w/ putative class member and RS re court order and next steps.	0.5	
4/14/2023	GCG	Review putative class member declaration.	0.1	
4/14/2023	GCG	Email to witness MH re Rule 23(f) petition.	0.1	
4/14/2023	GCG	Conf w/ and emails to EG re amicus in support of Rule 23(f).	0.3	
4/14/2023	JSY	Several calls with GCG next steps.	0.4	
4/14/2023	JSY	Emails and conf. re amicus brief.	0.3	
4/14/2023	JSY	Research re reply requirements, etc.; emails re same.	0.5	
4/14/2023	JSY	Emails with clients re 23(f).	0.2	
4/14/2023	JSY	Edit draft retainer; emails re same.	1.0	
4/14/2023	JSY	Look into potential plaintiffs and emails re same.	0.5	
4/14/2023	JSY	Emails and calls re amicus briefs.	0.3	
4/14/2023	BBK	Reviewing JSY email re amici participation in 23(f) petitions.	0.1	
4/14/2023	BBK	Reviewing notices re docketing of 23(f) petition; conferring w/ team re same.	0.1	
4/14/2023	BBK	Conferring w/ JSY and AX re Reply ISO 23(f) petition.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 699

SERVICES

Date	Person	Description of Services	Hours	Discount
4/14/2023	BBK	Updating clients re filing of 23(f) petition and CMC.	0.2	
4/14/2023	BBK	Searching for and conferring w/ RBGG team re potential additional named Ps.	0.5	
4/14/2023	AX	Update memo re 23f reply requirements and email correspondence with team.	0.2	
4/14/2023	AX	Review 23f petition.	0.4	
4/14/2023	AX	Confer with JSY, BBK re timing for 23f reply.	0.2	
4/14/2023	AX	Email correspondence with team re potential class reps.	0.2	
4/14/2023	KES	Review and circulate docketed 23f petition, including related court issued notices; organize in electronic files.	0.4	
4/14/2023	KES	Download and circulate ND version of petition.	0.1	
4/14/2023	KES	Review files and circulate class member opt out list to team.	0.3	
4/14/2023	KES	Troubleshoot co-counsel Relativity access and email co-counsel re same.	0.3	
4/15/2023	GCG	Review and revise outreach statement for putative class members.	0.1	
4/16/2023	JSY	Emails re CMC statement and amending pleadings.	0.1	
4/17/2023	GCG	Review pleadings from related case to address strategy post-motion.	0.5	
4/17/2023	GCG	Review and revise draft CMC statement.	1.0	
4/17/2023	GCG	Meet w/ co-counsel team to discuss same and plaintiff outreach.	0.3	
4/17/2023	GCG	Plan meeting w/ ADA experts re post-motion strategy.	0.1	
4/17/2023	GCG	Email from potential amici.	0.1	
4/17/2023	JSY	Emails re CMC statement.	0.2	
4/17/2023	JSY	Emails re amicus brief.	0.1	
4/17/2023	JSY	Conf. w/ GCG re witnesses and CMC.	0.2	
4/17/2023	JSY	Emails re witnesses and outreach.	0.2	
4/17/2023	JSY	Team meeting re potential witnesses and CMC statement; conf. w/ GCG re same.	0.9	
4/17/2023	JSY	Conf. w/ GCG re CMC statement.	0.1	
4/17/2023	JSY	Emails re meeting re multi plaintiff strategy.	0.1	
4/17/2023	JSY	Emails re witness outreach.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 700

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2023	JSY	Emails re Defs' edits to CMC statement.	0.2	
4/17/2023	JSY	Additional edits to CMC statement and emails re same.	0.4	
4/17/2023	BBK	Reviewing comm'ns w/ Ds re CMC Statement and EOT to respond to Pls' RFPs.	0.1	
4/17/2023	BBK	Conferring w/ team re identifying additional witnesses.	0.1	
4/17/2023	KES	Review information regarding declarants and create chart showing information for possible follow up for next phase of case.	2.4	
4/18/2023	GCG	Further revisions to draft CMC statement in light of defendants' changes.	0.1	
4/18/2023	GCG	Confs w/ JSY and emails to GW and MJ re same.	0.3	
4/18/2023	GCG	Review and comment on plans for amending complaint.	0.1	
4/18/2023	GCG	Emails w/ GW re witness outreach and facility classes.	0.2	
4/18/2023	GCG	Email to proposed amici re consent to their brief.	0.1	
4/18/2023	JSY	Edit CMC; emails re same.	0.4	
4/18/2023	JSY	Conf. w/ GCG re CMC statement.	0.1	
4/18/2023	JSY	Further edits to CMC statement; multiple emails re same; file same.	0.3	
4/18/2023	JSY	Conf. w/ GCG re outreach and CMC.	0.1	
4/18/2023	BBK	Reviewing Ds' section of CMC Statement and Pls' revisions in response thereto.	0.1	
4/18/2023	BBK	Reviewing emails w/ team re amicus ISO 23(f) petition and re individual Pls' ADA claims.	0.1	
4/18/2023	KES	Download and circulate pleading.	0.1	
4/19/2023	GCG	Emails to GW re amicus brief.	0.1	
4/19/2023	GCG	Email from ER re refusal to consent to brief.	0.1	
4/19/2023	GCG	Conf w/ JSY re amicus brief.	0.1	
4/19/2023	GCG	Coordinate w/ potential amici re amicus briefing in support of 23(f).	0.1	
4/19/2023	JSY	Emails re outreach to witnesses.	0.1	
4/19/2023	JSY	Emails re amicus brief.f.	0.1	
4/19/2023	JSY	Emails re outreach.	0.2	
4/19/2023	BBK	Analyzing recent 9th Cir opinion in Kirola; sharing w/ team.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 701

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2023	BBK	Reviewing comm'ns w/ co-counsel re amicus brief ISO 23(f) petition and outreach to ID additional witnesses.	0.1	
4/20/2023	GCG	Confs w/ JSY and emails w/ GW, MJ and JSY re amicus brief.	0.2	
4/20/2023	GCG	Confs w/ CC and TR re amicus brief.	0.2	
4/20/2023	GCG	Review and analyze amicus brief.	0.5	
4/20/2023	GCG	Revise retainer agreement for potential new plaintiffs.	0.3	
4/20/2023	GCG	Email w/ GW re next steps and CMC preparation.	0.1	
4/20/2023	GCG	Meet w/ TR, AR, GW, MJ and JSY re Castaneda alternation and approach.	0.4	
4/20/2023	JSY	Multiple emails and conf. re amicus brief; review same.	0.4	
4/20/2023	JSY	Meeting with AR and TF re BK cases and how to move forward after class cert denial.	0.5	
4/20/2023	JSY	Emails and conf. re meeting prior to CMC re strategy.	0.1	
4/20/2023	JSY	Emails re retainer agreement.	0.2	
4/20/2023	JSY	Messages and emails re Reply ISO 23(f).	0.2	
4/20/2023	JSY	Multiple emails re amicus brief.	0.4	
4/20/2023	BBK	Conferring w/ JSY and AX re Reply ISO 23(f) petition.	0.1	
4/20/2023	BBK	Reviewing amicus brief ISO 23(f) petition.	0.2	
4/20/2023	KES	Circulate amicus brief.	0.1	
4/21/2023	GCG	Meet w/ GW, MJ, BU and JSY to plan for CMC and Rule 23(f) reply.	1.1	
4/21/2023	GCG	Emails to GW, RS, and JSY re potential new plaintiff and revisions to retainer agreement.	0.2	
4/21/2023	JSY	Review research re amendments and further class cert motions.	0.2	
4/21/2023	JSY	Team meeting re CMC strategy and next steps.	1.1	
4/21/2023	JSY	Emails re draft MPSJ.	0.2	
4/21/2023	JSY	Calls and emails re amended retainer agreement; review same.	0.4	
4/21/2023	JSY	Emails re potential plaintiff.	0.1	
4/21/2023	BBK	Reviewing BU research re successive class cert motions and adding new named Ps.	0.1	
4/24/2023	GCG	Review CMC statement in preparation for CMC.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2023	GCG	Review defendants' Rule 23(f) opposition.	0.3	
4/24/2023	GCG	Email amici re same.	0.1	
4/24/2023	JSY	Conf. w/ GCG re class cert order.	0.2	
4/24/2023	JSY	Emails re potential clients.	0.1	
4/24/2023	JSY	Review Opp to 23(f) petition.	0.2	
4/24/2023	BBK	Conferring w/ team re meeting on 4/25 re addressing Ds' Opposition to 23(f) petition.	0.1	
4/24/2023	BBK	Reviewing BD's Opposition to Rule 23(f) petition.	0.3	
4/24/2023	AX	Review Brookdale 23f opposition and circulate to team.	0.4	
4/24/2023	GJG	Discuss recent case developments and future strategy with JY.	0.1	
4/25/2023	GCG	Meet w/ co-counsel team re reply ISO Rule 23(f).	0.5	
4/25/2023	GCG	Prepare for CMC.	0.4	
4/25/2023	GCG	(Reduced Charge) Travel to participate in CMC.	0.2	0.3
4/25/2023	GCG	Debrief w/ GW, MJ and JSY re same.	0.3	
4/25/2023	GCG	(Reduced Charge) Travel from CMC to office.	0.3	0.3
4/25/2023	GCG	Conf w/ BBK re CMC.	0.1	
4/25/2023	GCG	Email re new plaintiff.	0.1	
4/25/2023	GCG	Participate in CMC.	0.5	
4/25/2023	JSY	Conf. w/ GCG re 23(f) opp and CMC prep.	0.2	
4/25/2023	JSY	Review 23(f) Opp.	0.4	
4/25/2023	JSY	Review CMC statement.	0.2	
4/25/2023	JSY	Team meeting re 23f Reply.	0.5	
4/25/2023	JSY	Emails re research re delegation and control under ADA.	0.1	
4/25/2023	JSY	Attend CMC.	0.4	
4/25/2023	JSY	(Reduced Charge) Travel to and from CMC.	0.5	0.5
4/25/2023	JSY	Draft notes re CMC; emails re same.	0.5	
4/25/2023	JSY	Prep with co-counsel prior to CMC.	0.8	
4/25/2023	BBK	Meeting w/ co-counsel re Ds' Opposition to 23(f) petition.	0.5	
4/25/2023	BBK	Conferring w/ JSY and AX re legal research for Reply ISO 23(f) petition.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2023	BBK	Conferring w/ GCG re Case Management Conference; reviewing JSY report to team re same.	0.2	
4/25/2023	AX	Review Brookdale 23f opposition and related materials.	0.7	
4/25/2023	AX	Meeting with team re 23f reply.	0.5	
4/25/2023	AX	Email correspondence with team re research for 23f reply.	0.3	
4/26/2023	GCG	Confers w/ JSY, AX re legal research for 23(f).	0.3	
4/26/2023	GCG	Review and analyze AX research re contracting regulation.	0.2	
4/26/2023	GCG	Meet with RS and potential Plaintiff.	0.5	
4/26/2023	JSY	Conf. w/ GCG and AX re research re delegation under ADA; emails re same.	0.5	
4/26/2023	BBK	Conferring w/ RBGG team re legal research for Reply ISO 23(f) petition.	0.1	
4/26/2023	AX	Review 23f papers; research re ADA delegation and email correspondence re same.	3.3	
4/26/2023	AX	Call with GCG, JSY re research and 23f section.	0.4	
4/26/2023	AX	Email correspondence with GW re brief.	0.2	
4/27/2023	GCG	Review and revise section of Rule 23(f) reply.	0.4	
4/27/2023	GCG	Conf w/ AX and emails to GW and team re same.	0.1	
4/27/2023	JSY	Emails re Reply ISO petition.	0.1	
4/27/2023	BBK	Reviewing AX insert for Reply ISO 23(f) petition and GW ADA access section; conferring w/ AX re same.	0.2	
4/27/2023	BBK	Conferring w/ team re meeting on 4/28 on Reply ISO 23(f) Petition.	0.1	
4/27/2023	AX	Legal research; draft section of 23f Reply re commonality, access barriers.	2.5	
4/27/2023	AX	Email correspondence with GCG, GW re insert of 23f Reply; call with GCG re same.	0.3	
4/27/2023	AX	Email correspondence with team re meeting.	0.2	
4/28/2023	GCG	Review and revise draft Rule 23(f).	1.0	
4/28/2023	GCG	Meet w/ co-counseling team re same.	0.5	
4/28/2023	GCG	Confs w/ and emails to AX and BBK re cite check and cutting brief.	0.5	
4/28/2023	GCG	Emails w/ GW re same.	0.1	
4/28/2023	BBK	Reviewing GW draft Reply ISO 23(f) petition.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/28/2023	BBK	Meeting w/ co-counsel re Reply ISO 23(f) petition.	0.4	
4/28/2023	BBK	Phone call w/ GCG and AX re Reply ISO 23(f) petition.	0.2	
4/28/2023	BBK	Conducting record and fact cite-check of Reply ISO 23(f) petition.	3.4	
4/28/2023	AX	Meeting with team re 23f Reply.	0.4	
4/28/2023	AX	Review 23f reply draft and cut words; email and phone correspondence with GCG and BBK re same.	1.2	
4/28/2023	AX	Email and phone correspondence with GCG, BBK re Reply with cuts, email re same.	0.2	
4/29/2023	GCG	Review GW emails re revisions to Rule 23(f) reply.	0.1	
4/29/2023	GCG	Review and analyze revise reply brief.	0.3	
4/30/2023	GCG	Emails to GW, BBK and team re revisions to Rule 23(f) reply.	0.3	
4/30/2023	GCG	Review and revise draft reply brief.	0.5	
4/30/2023	GCG	Communications w/ JSY and AX re finalizing motion for leave to file and reply.	0.3	
4/30/2023	GCG	Meet w/ GW, JB, MJ and RS re same.	0.4	
4/30/2023	JSY	Review and edit Reply and Motion to file Reply; multiple emails and messages re same.	0.9	
4/30/2023	BBK	Reviewing comm'ns w/ co-counsel re revising/finalizing Reply ISO 23(f) petition.	0.1	
4/30/2023	BBK	Reviewing final draft Reply ISO 23(f) petition.	0.2	
5/1/2023	GCG	Continued revisions to Rule 23(f) reply.	0.5	
5/1/2023	GCG	Confs w/ JSY and KES and emails to GW and team re filing and service of motion for leave to file reply and reply.	0.5	
5/1/2023	GCG	Email to GW and team re outreach to potential new plaintiffs.	0.1	
5/1/2023	JSY	Conf. w/ GCG re Reply ISO 23(f).	0.2	
5/1/2023	JSY	Review and edit Reply.	0.3	
5/1/2023	JSY	Edit Motion.	0.1	
5/1/2023	JSY	Emails and calls re Reply.	0.2	
5/1/2023	JSY	Further edits to Reply; finalize same.	0.5	
5/1/2023	JSY	Finalize and file Reply; conf. re same.	0.3	
5/1/2023	BBK	Conferring w/ team re finalizing/filing Reply ISO 23(f) Petition.	0.2	
5/1/2023	AX	Cite check petition for leave to file reply.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/1/2023	AX	Email correspondence with team re Reply.	0.2	
5/1/2023	AX	Email correspondence with team re conflicts check, Reply, named plaintiffs, and other case issues.	0.3	
5/1/2023	KES	Call from relative of BKD resident re problems, follow up email with resources and status of case, email to team re same.	0.7	
5/1/2023	KES	File and serve reply re 23f petition; review 9th circuit efiling categories re same.	0.6	
5/1/2023	LHW	Supplemental Conflicts Check.	1.0	
5/2/2023	JSY	Conf. w/ KES re deadlines for motion re notice.	0.1	
5/2/2023	BBK	Comm'ns w/ team re outreach from putative class member's son.	0.1	
5/2/2023	AX	Review team correspondence re complaint from class member at Brookdale Alhambra.	0.1	
5/2/2023	KES	Download and circulate pleadings.	0.1	
5/2/2023	KES	Email R. Steyer re call from relative of BKD resident.	0.1	
5/8/2023	GCG	Review and revise draft motion for notice to class members.	0.4	
5/8/2023	GCG	Conf w/ JSY and emails to JSY, MJ and team re same.	0.1	
5/8/2023	JSY	Conf. w/ GCG re Admin Mtn.	0.2	
5/8/2023	JSY	Review and edit Admin. Mtn; emails re same.	1.6	
5/8/2023	JSY	Further emails re admin motion re notice.	0.2	
5/8/2023	BBK	Reviewing emails bet JSY and M Johnson re draft motion re: class notice.	0.2	
5/9/2023	GCG	Emails to JSY, MJ, BBK and ER re stipulation for additional pages and administrative motion to give class notice.	0.2	
5/9/2023	JSY	Emails re stipulation re page limits.	0.1	
5/9/2023	JSY	Emails re Motion re class notice.	0.2	
5/9/2023	BBK	Reviewing M Johnson - E Rutner comm'ns re stipulation re: page limits for briefing on class notice.	0.1	
5/9/2023	BBK	Proof-reading/cite-checking motion re: class notice; conferring w/ JSY/GCG and co-counsel re same.	1.0	
5/10/2023	GCG	Brief review of our reply.	0.1	
5/10/2023	GCG	Conf w/ JSY and emails to GW and JSY re approach to same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/10/2023	JSY	Conf. and emails re admin motion re notice; review proposed order re same.	0.3	
5/10/2023	JSY	Multiple emails and conf. re Defs' Opp to Motion to file Reply; research re same.	0.5	
5/10/2023	JSY	Emails and conf. re filing error in 9th Cir.	0.2	
5/10/2023	JSY	Emails re team meeting.	0.1	
5/10/2023	BBK	Conferring w/ team re Court Order directing Pls to re-file Motion re Class Notice w/ proposed order.	0.1	
5/10/2023	BBK	Reviewing 9th Cir Clerk notice re Reply ISO Rule 23(f).	0.1	
5/10/2023	BBK	Reviewing Ds' Opposition to Motion for Leave to File Reply ISO 23(f) Petition; conferring w/ team re same.	0.2	
5/10/2023	KES	Review court clerk notice and email team re efiling issue.	0.1	
5/10/2023	KES	Download and circulate pleading.	0.1	
5/12/2023	KES	Review and circulate pleading.	0.1	
5/17/2023	JSY	Emails re Reply ISO motion to file Reply.	0.2	
5/17/2023	BBK	Reviewing GW draft reply ISO Motion to File Reply ISO 23(f) Petition; conferring w/ RBGG team re same.	0.3	
5/17/2023	AX	Email correspondence re Reply to Request to file Reply.	0.2	
5/17/2023	KES	Download and circulate pleadings.	0.1	
5/18/2023	LRW	Save and circulate relevant case facts.	0.2	
5/23/2023	GCG	Confs w/ JSY and BBK and emails to GW and team re reply to motion to provide class notice of court rulings.	0.5	
5/23/2023	JSY	Multiple conf. and emails re Reply ISO motion re notice.	0.3	
5/23/2023	JSY	Further emails and messages re Reply; review opposition brief.	0.2	
5/23/2023	BBK	Conferring w/ JSY and GCG re drafting Reply ISO Motion re Class Notice.	0.3	
5/23/2023	BBK	Reviewing Ds' Opposition to Motion re Class Notice.	0.3	
5/24/2023	JSY	Emails re meeting to discuss Opp. brief.	0.1	
5/24/2023	BBK	Comm'ns w/ G. Wallace and JSY re meeting on 5/25 re Reply ISO Motion re Class Notice.	0.1	
5/25/2023	GCG	Conf w/ JSY re meeting w/ co-counsel and drafting reply brief and declaration.	0.1	
5/25/2023	JSY	Meeting re Reply ISO motion re notice.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/25/2023	JSY	Emails re Reply brief.	0.1	
5/25/2023	JSY	Conf. w/ GCG re Reply.	0.1	
5/25/2023	JSY	Conf. w/ BBK re Reply.	0.1	
5/25/2023	BBK	Emailing w/ B. Umpierre re drafting Reply ISO Motion re Class Notice.	0.1	
5/25/2023	BBK	Conferring w/ JSY re drafting Reply ISO Motion re Class Notice.	0.1	
5/25/2023	BBK	Reviewing GW notes/bullet points for Reply ISO Motion re Class Notice.	0.2	
5/25/2023	BBK	Meeting w/ JSY, GW, and MJ re strategy and plan for Reply ISO Motion re Class Notice.	0.3	
5/26/2023	JSY	Conf. w/ GCG re Reply.	0.1	
5/26/2023	JSY	Emails re Reply.	0.1	
5/26/2023	BBK	Conducting legal research for and planning/outlining Reply ISO motion re class notice.	6.4	
5/26/2023	BBK	Conferring w/ B. Umpierre by email and phone re Reply ISO motion re class notice.	0.3	
5/26/2023	BBK	Emailing w/ JSY and co-counsel re Reply ISO motion re class notice.	0.1	
5/27/2023	BBK	Conducting legal research for Reply ISO Motion re Class Notice.	1.4	
5/28/2023	BBK	Drafting Reply ISO Motion re Class Notice.	7.4	
5/29/2023	GCG	Review and analyze plaintiffs' Reply in support of reply re Rule 23(f) petition.	0.2	
5/29/2023	GCG	Review and analyze defendants' opposition to class notice.	0.2	
5/29/2023	GCG	Review and revise draft reply in support of class notice.	0.2	
5/29/2023	GCG	Email to JSY and BBK re same.	0.1	
5/29/2023	JSY	Edit Reply re Notice; emails re same.	1.4	
5/29/2023	BBK	Drafting Reply ISO Motion re Class Notice.	0.6	
5/29/2023	BBK	Reviewing draft M. Johnson decl ISO motion re class notice.	0.1	
5/29/2023	BBK	Conferring w/ JSY and GCG re revising/shortening Reply ISO Motion re Class Notice.	0.1	
5/29/2023	BBK	Revising Reply ISO Motion re Class Notice to incorporate JSY revisions and M. Johnson declaration; conferring w/ co-counsel re same.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/30/2023	GCG	Confs w/ JSY and texts to BBK and emails to MJ re motion to seal and reply pleadings.	0.5	
5/30/2023	JSY	Conf. w/ GCG re filing.	0.1	
5/30/2023	JSY	Multiple emails and messages re Reply ISO motion re Notice.	0.3	
5/30/2023	JSY	Review and edit filings re Reply re Notice; prepare sealing documents related to same; finalize and file same.	3.9	
5/30/2023	BBK	Conferring w/ JSY and T Close re legal cite check for Reply ISO Motion re Class Notice.	0.3	
5/30/2023	BBK	Reviewing/revising draft M Johnson attorney declaration; conferring w/ team re same.	0.4	
5/30/2023	BBK	Proof-reading/finalizing Reply ISO Motion re Class Notice.	0.6	
5/30/2023	BBK	Conferring w/ JSY and co-counsel re finalizing/filing Reply Brief and supporting declarations; reviewing emails re whether to file sealing motion.	0.2	
5/30/2023	BBK	Attending to finalizing/finalizing Reply Brief and supporting declarations and exhibits (including comm'ns w/ JSY, WP, and KES re same).	0.8	
5/30/2023	BBK	Conferring w/ JSY re filing motion to seal exhibits to M Johnson Declaration; reviewing/approving same.	0.2	
5/30/2023	AX	Review email correspondence from team re Reply for motion for class notice; review Reply.	0.4	
5/30/2023	FGL	(Billing Judgment) JSY email re unredacted/filed under seal declaration and call with JSY re same.	0.0	0.1
5/30/2023	FGL	(Billing Judgment) Revise declaration caption page re "Unredacted" and revise second declaration with "Redacted" and removal of all exhibits/replace with "Filed Under Seal" slip sheets.	0.0	0.3
5/30/2023	KES	Brief review of final reply documents and make minor edit to caption page; efile reply and admin motion to seal; serve sealed documents and prepare POS re same.	0.9	
5/31/2023	GCG	Conf w/ JSY and emails to GW amici re denial of Rule 23(f) petitions and next steps in the trial court.	1.0	
5/31/2023	JSY	Multiple conf. and emails re 23f order.	0.5	
5/31/2023	JSY	Emails re meeting to discuss next steps.	0.1	
5/31/2023	BBK	Reviewing order denying Rule 23(f) petition; conferring w/ team re same.	0.2	
5/31/2023	AX	Review Ninth Circuit 23f order, joint status report, and email correspondence with team re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/31/2023	KES	Review and circulate appellate order.	0.2	
6/1/2023	GCG	Review emails from GW re denial of Rule 23(f) and next steps.	0.1	
6/1/2023	JSY	Emails re meeting.	0.1	
6/1/2023	BBK	Comm'ns w/ co-counsel re meeting on next steps ILO denial of 26(b) petition.	0.1	
6/4/2023	GCG	Conf w/ MWB re next steps in trial court.	0.1	
6/5/2023	BBK	Reviewing/commenting on Ds Objections to Pls' Reply ISO Motion for Class Notice and proposed surreply.	0.2	
6/6/2023	GCG	Emails to KES team re defendants' sealing pleading.	0.1	
6/6/2023	JSY	Emails re team meeting; conf. w/ GCG re next steps.	0.2	
6/6/2023	KES	Download, review and circulate Defs response re sealing motion.	0.3	
6/6/2023	KES	Update electronic pleadings file.	0.3	
6/8/2023	GCG	Conf w/ JSY and email to GW re meeting w/ co-counsel.	0.1	
6/8/2023	JSY	Emails re team meeting.	0.1	
6/11/2023	JSY	Emails re meeting.	0.1	
6/13/2023	GCG	Conf w/ JSY re meeting w/ co-counsel.	0.1	
6/13/2023	JSY	Emails re sealing issue.	0.1	
6/13/2023	BBK	Reviewing comm'ns w/ co-counsel re opposing counsel's request to redact Johnson Decl filed ISO Reply for Motion re Class Notices.	0.1	
6/14/2023	GCG	Conf w/ JSY and emails to AX and GW re defendants' sealing request.	0.2	
6/14/2023	GCG	Conf w/ AX re next steps on the case.	0.1	
6/14/2023	JSY	Emails and conf. re re-doing sealing motion.	0.2	
6/14/2023	JSY	Emails re sealing motion.	0.1	
6/14/2023	BBK	Reviewing AX's recommended response to Ds' request to redact portions of Johnson Decl ISO Reply for Motion re Class Notice; comm'ns w/ co-counsel re same.	0.2	
6/14/2023	AX	Review filed pleadings, prior orders, local rules and send email with analysis re sealing issue.	1.5	
6/14/2023	AX	Email correspondence with cocounsel and opposing counsel re sealing issues.	0.2	
6/15/2023	GCG	Meet w/ JSY, RS and TC re next steps.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/15/2023	GCG	Conf w/ SJR re strategy post Rule 23(f).	0.2	
6/15/2023	JSY	Conf with GCG re team meeting and next steps.	0.2	
6/15/2023	JSY	Team meeting and emails re same.	0.1	
6/15/2023	JSY	Emails re follow up from meeting.	0.1	
6/15/2023	JSY	Review sealing pleadings.	0.2	
6/15/2023	BBK	Reviewing AX-JSY comm'ns re co-counsel meeting and filing of redacted Johnson Declaration ISO Motion re Class Notice.	0.1	
6/15/2023	AX	Prepare motion to file incorrect document and proposed order; prepare amended sealing documents; related review of prior orders and local rules.	3.0	
6/15/2023	KES	Emails with team re amended sealing motion.	0.2	
6/15/2023	KES	Check status of oral argument in 9th cir case.	0.1	
6/16/2023	GCG	Conference with AX re sealing filing.	0.1	
6/16/2023	BBK	Reviewing comm'ns re finalizing/filing docs relating to removal of M. Johnson Decl from docket and admin motion re: sealing portions of same.	0.1	
6/16/2023	AX	Calls with KES re sealing motion.	0.4	
6/16/2023	AX	Revise and finalize sealing papers.	2.2	
6/16/2023	KES	Redact, finalize, serve and efile amended motion to seal and motion to remove; confer AX re same.	2.2	
6/19/2023	GCG	Email GW re next steps in case.	0.1	
6/20/2023	GCG	Email with GW re call and Herredia oral argument.	0.1	
6/20/2023	KES	Download and circulate order.	0.1	
6/21/2023	GCG	Prepare for and conduct call w/ GW re SJ and other next steps in case.	0.5	
6/21/2023	GCG	Email to JSY re same.	0.1	
6/23/2023	KES	Download and circulate Defs sealing motion.	0.2	
6/28/2023	KES	TC relative of former class member re status of case.	0.4	
6/28/2023	KES	TC and emails re request from counsel.	0.2	
6/29/2023	JSY	Emails re transcript request.	0.2	
6/29/2023	KES	Emails with team re provision of transcript to counsel, review for confidential information and upload to Sharefile for counsel.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/30/2023	GCG	Conf w/ AX and emails to AX and MJ re defendants' sealing errors.	0.2	
6/30/2023	BBK	Conferring w/ AX re asking Ds to fix publicly-filed docs that should have been redacted/under seal.	0.2	
6/30/2023	AX	Review Brookdale sealing documents and docket.	0.8	
6/30/2023	AX	Confer with KES re sealing.	0.1	
6/30/2023	AX	Email correspondence with team and opposing counsel re sealing issues.	0.5	
6/30/2023	AX	Review local rules re sealing.	0.2	
6/30/2023	AX	Confer with GCG re case issues.	0.1	
6/30/2023	KES	Download, circulate, review Defs motion to seal filings and confer AX re same.	0.5	
7/5/2023	AX	Emails with consultant re case update.	0.2	
7/10/2023	GCG	Conf w/ JSY and email BBK re motion for summary judgment.	0.2	
7/10/2023	JSY	Conf. and emails re MSJ.	0.1	
7/11/2023	GCG	Emails to GW and JSY re implications of related case oral argument.	0.2	
7/11/2023	JSY	Emails re Sunrise argument.	0.1	
7/11/2023	BBK	Emailing w GCG re drafting motion for summary adjudication.	0.1	
7/13/2023	JSY	Emails re team meeting.	0.1	
7/14/2023	GCG	Prepare for and conduct meeting w/ co-counsel re oral argument in related case and motion for partial summary judgment in ours.	0.7	
7/14/2023	GCG	Follow up conference and emails to JSY and BBK re plan for MSJ declarations.	0.2	
7/14/2023	JSY	Emails and calls re access barriers project.	0.2	
7/14/2023	JSY	Team meeting re status and MPSJ.	0.5	
7/14/2023	BBK	Meeting w/ co-counsel re partial MSJ and renewed cert motion and post-meeting w/ GCG and JSY re same.	0.9	
7/14/2023	BBK	Emailing w/ KES and JSY re partial MSJ and analysis of access barriers for same.	0.1	
7/14/2023	KES	Review status of barrier list project and confer JY re updates for upcoming motion.	0.4	
7/17/2023	BBK	Reviewing/analyzing partial draft of motion for summary adjudication.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/17/2023	BBK	Researching ND Cal Local Rules and Judge Gilliam standing orders re: requirements for joint and/or separate statements of undisputed material facts for MSJs.	0.3	
7/18/2023	KES	Begin revised barrier list for 5 plaintiff facilities for MSJ.	1.3	
7/19/2023	BBK	Emailing w/ KES re analysis of access barriers at six BD facilities where Pls resided.	0.1	
7/19/2023	KES	Complete revised barrier list for 5 plaintiff facilities for MSJ.	2.1	
7/25/2023	BBK	Reviewing emails from co-counsel re status of discovery stay ILO order on class cert motion.	0.1	
7/25/2023	BBK	Conferring w/ KES re summary adjudication motion prep.	0.2	
7/26/2023	GCG	Email to JSY re MJ seeking to re-open discovery.	0.1	
7/26/2023	JSY	Emails re discovery requests.	0.1	
7/26/2023	BBK	Emailing w/ JSY re analyzing/commenting on M. Johnson proposal re serving additional written discovery.	0.1	
7/27/2023	JSY	Emails re discovery requests.	0.1	
7/27/2023	BBK	Analyzing M. Johnson's position on discovery stay and revising draft set of RFP; reporting to RBGG team re same.	0.7	
7/27/2023	BBK	Emailing M. Johnson re RBGG's comments on new set of RFPs.	0.1	
7/27/2023	AX	Review team emails re discovery.	0.2	
7/27/2023	KES	Begin gathering photos corresponding to limited barrier list for MSJ.	0.7	
7/28/2023	JSY	Emails re discovery requests.	0.1	
8/1/2023	GCG	Emails re discovery and case "paused".	0.1	
8/1/2023	BBK	Conferring w/ RBGG team re Ds' representation that case is "paused" pending outcome of motion on class notice.	0.1	
8/1/2023	AX	Review email correspondence from team re CMC, case issues.	0.1	
8/1/2023	KES	Gather and organize photos corresponding to limited barrier list for MSJ.	2.1	
8/2/2023	JSY	Review Heredia 9th Cir. decision; emails re same.	0.2	
8/2/2023	BBK	Reviewing 9th Circuit opinion affirming class cert order in Heredia v. Sunrise; reviewing emails w/ co-counsel re same.	0.2	
8/2/2023	KES	Continue gathering and organization of photos corresponding to limited barrier list for MSJ.	1.1	
8/3/2023	GCG	Review Heredia decision.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/3/2023	GCG	Email to GW and team re same.	0.1	
8/3/2023	JSY	Emails re team meeting.	0.2	
8/3/2023	BBK	Comm'ns w/ team re scheduling next co-counsel meeting.	0.2	
8/3/2023	BBK	Emailing w/ GCG and co-counsel re notifying court re: 9th Circuit's affirming class cert order in Sunrise case.	0.1	
8/3/2023	KES	Complete gathering and organization of photos corresponding to limited barrier list for MSJ.	1.4	
8/4/2023	GCG	Review and comment on notice of Heredia decision.	0.2	
8/4/2023	BBK	Conferring further w/ GCG and co-counsel re: notifying court re 9th Cir opinion affirming class cert order in Sunrise case.	0.1	
8/4/2023	AX	Review team correspondence re notice of Heredia decision.	0.1	
8/4/2023	AX	Review Heredia decision.	0.3	
8/7/2023	GCG	Email to JSY and BBK re SJ motion and letter to clients.	0.1	
8/7/2023	JSY	Emails re meeting.	0.1	
8/7/2023	BBK	Attending to scheduling meeting w/ JSY and GCG re summary judgment motion.	0.1	
8/7/2023	KES	Westlaw research.	0.2	
8/7/2023	KC	Coordinate and schedule meeting with GCG, JSY, and BBK re MSJ and status update to clients.	0.4	
8/8/2023	BBK	Reviewing M. Johnson draft administrative motion re: lifting litigation pause and setting CMC.	0.2	
8/8/2023	AX	Review emails re draft admin motion; review motion.	0.2	
8/9/2023	GCG	Review and revise administrative motion to end litigation pause.	0.4	
8/9/2023	GCG	Emails to GW, MJ and team re same.	0.2	
8/9/2023	GCG	Meet w/ JSY and BBK re motion for summary judgment status.	0.3	
8/9/2023	JSY	Emails re Admin motion.	0.1	
8/9/2023	JSY	Conf. w/ GCG and BBK re admin motion and MSJ.	0.4	
8/9/2023	BBK	Meeting w/ GCG and JSY re summary adjudication motion and admin motion for CMC.	0.3	
8/9/2023	BBK	Reviewing GCG proposed revisions to admin motion for CMC and emails w/ co-counsel re same.	0.1	
8/9/2023	AX	Review emails re admin motion, scheduling issues from expert.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/9/2023	KES	Research WL version of case.	0.1	
8/10/2023	GCG	Prepare for and conduct meeting of GW and MJ re revisions to administrative motion and overall strategy and approach.	0.5	
8/10/2023	GCG	Conf w/ JSY and email to partners re same.	0.1	
8/10/2023	GCG	Emails to MJ and GW re defendants' position on same.	0.1	
8/10/2023	JSY	Conf. w/ GCG re strategy for MSJ.	0.1	
8/10/2023	SJR	Status emails.	0.2	
8/10/2023	BBK	Reviewing emails between co-counsel and opposing counsel re: Pls' forthcoming admin motion for CMC.	0.1	
8/10/2023	AX	Review emails re admin motion.	0.1	
8/11/2023	GCG	Review MJ revisions to admin motion.	0.3	
8/11/2023	GCG	Review draft MJ declaration and proposed order.	0.1	
8/11/2023	GCG	Emails to GW and MJ re same and re overall strategy and approach.	0.1	
8/15/2023	GCG	Review and analyze defendants' response to administrative motion to lift pause.	0.2	
8/15/2023	BBK	Reviewing Ds' Opp to Admin Motion re Litigation Pause and Request for Further CMC.	0.2	
8/15/2023	AX	Review Defs' opposition to admin motion.	0.2	
8/15/2023	KES	Download and circulate pleadings.	0.1	
8/16/2023	GCG	Review court order re CMC and trial date.	0.2	
8/16/2023	GCG	Confs w/ MWB and JSY and email GW re same.	0.1	
8/16/2023	JSY	Emails re order re CMC.	0.1	
8/16/2023	JSY	Emails and conf. w/ GCG re order re CMC.	0.2	
8/16/2023	BBK	Reviewing court order setting CMC and notifying parties re intent to set trial date; conferring w/ team re same.	0.1	
8/16/2023	KES	Review court order and calendar hearing.	0.2	
8/17/2023	JSY	Conf. w/ GCG and BBK re MSJ.	0.3	
8/17/2023	BBK	Conferring w/ JSY re summary judgment motion.	0.1	
8/18/2023	GCG	Conf w/ BBK re motion for partial summary judgment.	0.2	
8/18/2023	GCG	Prepare for and conduct meeting w/ GW and team re plan for CMC and trial setting.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/18/2023	GCG	Draft and send email to courtroom deputy re court reporter for CMC.	0.2	
8/18/2023	GCG	Emails to GW and team re same.	0.1	
8/18/2023	JSY	Team meeting.	1.2	
8/18/2023	BBK	Meeting w/ GCG re plan for motion for summary adjudication on ADA issues.	0.3	
8/18/2023	BBK	Analyzing evidence and planning for motion for summary adjudication; conferring w/ KES re same.	4.2	
8/18/2023	BBK	Meeting w/ co-counsel re plan for 8/24 CMC statement and trial.	1.1	
8/18/2023	BBK	Reviewing/conferring w/ team re emailing courtroom deputy to confirm CMC will be recorded by court reporter.	0.1	
8/18/2023	KES	Emails with team re update barrier list and photos.	0.2	
8/20/2023	BBK	Reviewing G. Wallace proposed witness list for trial.	0.1	
8/20/2023	BBK	Analyzing evidence and planning motion for summary adjudication on ADA barriers.	0.9	
8/21/2023	GCG	Review and revise meet and confer communication from MJ to defendants.	0.3	
8/21/2023	GCG	Emails to GW, MJ and team re same and re discovery needed for trial.	0.3	
8/21/2023	GCG	Emails w/ ER re meet and confer for CMC.	0.1	
8/21/2023	GCG	Draft, revise and finalize request for recording of CMC per courtroom deputy instructions.	0.5	
8/21/2023	GCG	Confs w/ KES and JSY and emails to GW, MJ and JSY re same and re CMC preparation.	0.4	
8/21/2023	GCG	Emails to BBK and experts re summary judgment declarations.	0.2	
8/21/2023	GCG	Review and comment on GW witness list for trial; email GW re evaluation issues.	0.2	
8/21/2023	JSY	Conf. w/ GCG two times re CMC prep.	0.2	
8/21/2023	JSY	Review Ralphs case.	0.2	
8/21/2023	JSY	Emails re request for reporter.	0.1	
8/21/2023	BBK	Drafting/revising emails to access experts re Decls ISO Partial MSJ; conferring w/ GCG re same.	0.5	
8/21/2023	BBK	Emailing w/ access experts re availability to work on Decls ISO Partial MSJ.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/21/2023	BBK	Reviewing M. Johnson draft meet and confer email to Ds and GCG's comments on same.	0.3	
8/21/2023	BBK	Reviewing emails w/ opposing counsel re positions on trial timing and length and pre-trial work.	0.1	
8/21/2023	BBK	Reviewing emails w/ co-counsel re: filing request to record CMC; reviewing draft of same.	0.2	
8/21/2023	AX	Review case emails.	0.1	
8/21/2023	KES	Review, revise, finalize and efile request to record CMC and email proposed order.	0.9	
8/22/2023	GCG	Prepare for and conduct meet and confer w/ defendants re trial deadlines.	0.6	
8/22/2023	GCG	Follow up conf w/ MJ and GW re same and emails MJ, GW and team re discovery and trial plan.	0.4	
8/22/2023	JSY	Emails re Hemet inspection.	0.2	
8/22/2023	BBK	Conferring w/ team re inspection of BD Hemet; researching/reporting to team re same.	0.4	
8/22/2023	BBK	Emailing KES re analyzing access barriers at BD Hemet for partial MSJ.	0.1	
8/22/2023	BBK	Meeting w/ KES re plan for partial MSJ.	0.3	
8/22/2023	BBK	Analyzing facts for partial MSJ.	0.7	
8/22/2023	AX	Review emails from team re Brookdale Hemet inspection, CMC issues.	0.2	
8/23/2023	GCG	Review and analyze Judge Gilliam standing orders for trial.	0.4	
8/23/2023	GCG	Emails to GW and team re same and re preparation for CMC.	0.3	
8/23/2023	GCG	Conf w/ JSY re same.	0.2	
8/23/2023	GCG	Draft memo to file re meet and confer w/ defendants.	0.3	
8/23/2023	JSY	Conf. w/ GCG re meet and and confer and CMC; emails re same.	0.3	
8/23/2023	BBK	Conducting legal research for partial MSJ on access barriers.	0.7	
8/23/2023	BBK	Conferring w/ co-counsel and RBGG team re proposed deadlines for dispositive motions, pre-trial conference and trial.	0.1	
8/23/2023	BBK	Reviewing GCG memo to team re 8/23 meet and confer w/ opposing counsel in advance of 8/24 CMC.	0.1	
8/23/2023	BBK	Reviewing/responding to KES email re analysis of access barriers at BD Hemet for partial MSJ.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/23/2023	AX	Review GCG memo re discovery M&C.	0.1	
8/23/2023	KES	Update MSJ barrier list with Hemet barriers and gather corresponding photos re same.	1.4	
8/24/2023	GCG	Prepare for CMC.	1.0	
8/24/2023	GCG	(Reduced Charge) Travel to participate in CMC.	0.2	0.3
8/24/2023	GCG	Meet w/ OC and co-counsel before and after CMC.	1.0	
8/24/2023	GCG	Draft notes for team.	0.2	
8/24/2023	GCG	Review court order re omnibus sealing motion.	0.1	
8/24/2023	GCG	Conf w/ KES re ordering transcript.	0.1	
8/24/2023	GCG	Participate in CMC.	0.5	
8/24/2023	JSY	Emails re CMC.	0.1	
8/24/2023	JSY	Emails and messages re CMC and sealing issues.	0.2	
8/24/2023	BBK	Reviewing co-counsel emails re responding to opposing counsel re: RFP Set 9 and M&C emails re same.	0.1	
8/24/2023	BBK	Reviewing Court's orders on sealing motions; comm'ns w/ team re same.	0.1	
8/24/2023	BBK	Reviewing GCG tasklist ILO CMC; conferring w/ RBGG re meeting re same.	0.1	
8/24/2023	AX	Review court minute order, and emails with team re CMC.	0.2	
8/24/2023	KES	Draft transcript order form and follow up re court reporter name re same.	0.4	
8/24/2023	KES	Review court order and calendar deadline.	0.1	
8/24/2023	KC	Coordinate and schedule Zoom meeting re Order of 8/24/2023.	0.5	
8/25/2023	GCG	Meet w/ team to discuss CMC upcoming motions and overall strategy and approach.	0.5	
8/25/2023	JSY	Team meeting re next steps after CMC; conf. w/ GCG re same.	0.6	
8/25/2023	BBK	Reviewing Court's Minute Order re 8/25 CMC and denying motion re: class notice.	0.1	
8/25/2023	BBK	Analyzing access barriers at Pls' facilities and conducting legal research for partial MSJ.	0.8	
8/25/2023	BBK	Meeting w/ RBGG team re: sealing motion and motion for partial summary judgment.	0.4	
8/25/2023	AX	Team meeting re CMC, MSJ, and other case updates.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/25/2023	KES	Finalize and efile hearing transcript request.	0.3	
8/25/2023	KES	Calendar deadline.	0.1	
8/25/2023	KES	Zoom meeting re case status, next steps.	0.5	
8/26/2023	GCG	Review and analyze SCOTUS Title 3 briefing for use in motion for partial SJ.	0.4	
8/28/2023	GCG	Emails to BBK and team re omnibus motion to seal.	0.2	
8/28/2023	BBK	Emailing w/ KES re compiling prior filings relevant to comply w/ Court's Order re omnibus sealing motion.	0.2	
8/28/2023	BBK	Analyzing prior filings relevant to comply w/ Court's Order re omnibus sealing motion; drafting report to RBGG team re same.	1.4	
8/28/2023	BBK	Conducting factual and legal analysis for partial MSJ.	3.0	
8/28/2023	BBK	Drafting/sending to GCG/JSY proposed recommendation to co-counsel re Pls' positions for omnibus sealing motion and meeting and conferring w/ Ds re same; sending same to co-counsel.	0.4	
8/28/2023	KES	Gather pleadings for BBK for omnibus sealing motion.	0.7	
8/29/2023	BBK	Conferring w/co-counsel re meet and confer email to Ds re omnibus sealing motion; sending same.	0.2	
8/29/2023	BBK	Emailing w/ co-counsel & opposing counsel re telephonic meet and confer on briefing schedule, discovery disputes, and omnibus sealing motion.	0.2	
8/29/2023	BBK	Conducting legal research and factual analysis for partial MSJ.	1.0	
8/29/2023	AX	Review emails re M&C and sealing issues.	0.2	
8/30/2023	GCG	Emails to BBK and team re meet and confer w/ defendants and sealing motion.	0.2	
8/30/2023	JSY	Emails re named plaintiffs dates of residence.	0.2	
8/30/2023	JSY	Conf. w/ BBK re M+C and emails re same.	0.3	
8/30/2023	JSY	Conf. and emails re transcript.	0.2	
8/30/2023	BBK	Researching/drafting partial MSJ.	2.2	
8/30/2023	BBK	Reviewing M. Johnson emails w/ opposing counsel re: meet and confer on discovery disputes.	0.1	
8/30/2023	BBK	Emailing w/ co-counsel re prep for meet and confer w/ Ds.	0.2	
8/30/2023	BBK	Preparing for meet and confer w/ Ds on case schedule, sealing motion and discovery disputes.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/30/2023	BBK	Meeting and conferring w/ Ds on case schedule, sealing motion and discovery disputes.	0.5	
8/30/2023	BBK	Drafting/sending report to RBGG team re meet & confer w/ Ds on case schedule, sealing motion and discovery disputes.	0.3	
8/30/2023	BBK	Meeting w/ JSY re meet and confer w/ Ds, omnibus sealing motion, and partial MSJ.	0.2	
8/30/2023	BBK	Conferring w/ KES and RBGG team re status of transcript of 8/24 CMC.	0.1	
8/30/2023	BBK	Analyzing Ds' draft omnibus sealing motion and proposed order; drafting Pls' portion of same.	1.7	
8/30/2023	BBK	Drafting/sending email to JSY and GCG w/ recommendations re: Pls' portion of omnibus sealing motion.	0.3	
8/30/2023	BBK	Reviewing M. Johnson's draft stipulation re case schedule.	0.1	
8/30/2023	KES	Emails and follow up re CMC transcript.	0.6	
8/31/2023	GCG	Review and revise stipulation and proposed order re case schedule.	1.0	
8/31/2023	GCG	Confs w/ GW, MJ, JSY and MJ and emails to ER and team re same.	0.9	
8/31/2023	GCG	Confs w/ and emails to KES re revision and e-filing of stipulation.	0.3	
8/31/2023	JSY	Conf. w/ GCG re MPSJ.	0.1	
8/31/2023	JSY	Emails re stipulation re case schedule.	0.1	
8/31/2023	JSY	Emails re sealing motion; review same.	0.1	
8/31/2023	JSY	Multiple emails re stipulation and sealing motions; conf. w/ GCG re same.	0.2	
8/31/2023	BBK	Conferring w/ GCG and JSY re: co-counsel's draft stip re briefing and pre-trial schedule.	0.1	
8/31/2023	BBK	Emailing w/ JSY re draft Pls' portions of omnibus sealing motion and recommendation re: same.	0.1	
8/31/2023	BBK	Revising Pls' draft portions of omnibus sealing motion and proposed order.	0.2	
8/31/2023	BBK	Drafting/sending recommendation to co-counsel re: Pls' position on omnibus sealing motion and send draft Pls' draft portions of same.	0.3	
8/31/2023	BBK	Reviewing transcript of 8/24 CMC.	0.2	
8/31/2023	BBK	Following-up w/ opposing counsel re draft stip re briefing and pre-trial schedule; emailing w/ M. Johnson re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/31/2023	BBK	Reviewing Ds' proposed edits to stip re briefing and case schedule; emailing w/ GCG and M. Johnson re responding to same.	0.3	
8/31/2023	BBK	Phone call w/ GCG re Brookdale projects.	0.1	
8/31/2023	BBK	Preparing motion for partial summary judgment.	1.1	
8/31/2023	BBK	Conferring w/ co-counsel re omnibus sealing motion.	0.1	
8/31/2023	BBK	Proof-reading omnibus sealing motion and proposed order; emailing Ds re same.	0.3	
8/31/2023	KES	Emails with court reporter and team re transcript.	0.6	
8/31/2023	KES	Review, revise, finalize and efile Stip and Proposed Order; email Word version re same.	0.7	
9/5/2023	BBK	Reviewing draft M. Jacobsen decl and supporting exhibits for omnibus sealing motion; reporting to co-counsel re same.	0.3	
9/5/2023	BBK	Researching/drafting partial MSJ.	0.7	
9/6/2023	GCG	Emails to BBK re motion to seal status.	0.2	
9/6/2023	GCG	Conf w/ JSY and emails to BBK and AX re motion for partial summary judgment.	0.4	
9/6/2023	GCG	Review and analyze court order w/ pretrial and trial schedule.	0.2	
9/6/2023	GCG	Emails to GW and team re same.	0.2	
9/6/2023	GCG	Review and revise RS letter to putative class members.	0.2	
9/6/2023	JSY	Conf. w/ GCG re MSJ; emails re same.	0.4	
9/6/2023	JSY	Emails re trial schedule.	0.1	
9/6/2023	MWB	Review GCG email.	0.1	
9/6/2023	SJR	Report from GCG re status.	0.1	
9/6/2023	BBK	Reviewing Court's Order setting pre-trial schedule; identifying additional deadlines tied to dates set by scheduling order from Local Rules and Standing Orders and conferring w/ KES re calendaring same.	0.5	
9/6/2023	BBK	Emailing w/ M. Jacobsen re: filing omnibus motion to seal and supporting papers; updating GCG re same.	0.3	
9/6/2023	BBK	Emailing w/ access expert J. Mastin re meeting on declaration ISO partial MSJ.	0.2	
9/6/2023	BBK	Drafting/sending proposal to GCG/JSY/AX re timing/scope of partial MSJ in light of CMC and scheduling order; conferring w/ team re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/6/2023	BBK	Conducting legal research and drafting partial MSJ.	1.1	
9/6/2023	BBK	Emailing w/ RBGG team re publication of class cert order.	0.2	
9/6/2023	BBK	Reviewing R. Steyer draft letter to putative class members re: case status and GCG comments on same.	0.1	
9/6/2023	BBK	Emailing w/ team re 9/8 team meeting and setting weekly meetings ILO upcoming trial and pre-trial deadlines.	0.1	
9/6/2023	AX	Review team emails re scheduling order, letter to residents, partial msj and class cert motion.	0.2	
9/6/2023	KES	Download, review and circulate scheduling order and calendar all deadlines.	0.9	
9/7/2023	GCG	Email to GW and team re letters to named plaintiffs re trial date.	0.1	
9/7/2023	GCG	Conf w/ KES re sealing motion.	0.1	
9/7/2023	BBK	Researching and drafting partial MSJ.	3.9	
9/7/2023	BBK	Conferring w/ KES re omnibus sealing motion and under seal/redacted exhibits thereto; emailing w/ M. Jacobsen re same.	0.2	
9/7/2023	BBK	Conferring w/ access expert J. Mastin re meeting on declaration ISO motion for partial summary judgment; attending to setting up same.	0.2	
9/7/2023	KES	Download and circulate sealing motion and under seal docs.	0.4	
9/8/2023	GCG	Email w/ JSY re co-counsel meeting and MPSJ.	0.1	
9/8/2023	JSY	Team meeting.	1.0	
9/8/2023	JSY	Draft notes re co-counsel meeting; emails re same.	0.3	
9/8/2023	JSY	Emails re facility inspections and MSJ.	0.1	
9/8/2023	JSY	Emails re MPSJ.	0.2	
9/8/2023	BBK	Preparing for co-counsel meeting.	0.2	
9/8/2023	BBK	Meeting w/ co-counsel re case tasks.	1.0	
9/8/2023	BBK	Emailing w/ JSY re outreach to access experts re: inspections of BD facilities and re: work on partial MSJ.	0.2	
9/8/2023	BBK	Emailing w/ G Wallace and JSY re partial MSJ strategy.	0.4	
9/8/2023	BBK	Analyzing/planning motion for partial summary judgment ILO co-counsel meeting.	0.7	
9/8/2023	AX	Team meeting re case strategy and upcoming site inspections, class cert motions, and other issues.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 722

SERVICES

Date	Person	Description of Services	Hours	Discount
9/8/2023	AX	Email correspondence from team re PMS.	0.1	
9/8/2023	KES	Participate in Zoom meeting with co-counsel re summary judgment and trial.	1.0	
9/11/2023	GCG	Review and analyze class list stipulation.	0.1	
9/11/2023	GCG	Prepare revisions to RS letter to putative class members.	0.1	
9/11/2023	GCG	Emails to RBGG team re motion for partial summary judgment and letter to class members.	0.2	
9/11/2023	JSY	Emails re letters to class reps.	0.1	
9/11/2023	BBK	Preparing for meeting w/ access expert J. Mastin re: motion for partial summary judgment.	0.5	
9/11/2023	BBK	Meeting w/ access expert J. Mastin re: motion for partial summary judgment.	1.0	
9/11/2023	BBK	Emailing w/ access expert G. Waters re: motion for partial summary judgment and re-inspections of BD facilities where named Ps reside.	0.2	
9/11/2023	BBK	Compiling materials for J. Mastin declaration ISO motion for partial summary judgment; emailing w/ him re same.	0.3	
9/11/2023	BBK	Researching/drafting motion for partial summary judgment.	1.7	
9/11/2023	BBK	Emailing w/ RBGG team re: drafting/sending letters to individual Pls' re: case.	0.1	
9/12/2023	GCG	Conf w/ JSY and email to BBK re MSJ and letter to clients.	0.1	
9/12/2023	JSY	Conf. w/ GCG re letter to class reps and MSJ.	0.1	
9/12/2023	JSY	Emails re MPSJ.	0.1	
9/12/2023	BBK	Emailing w/ access expert G. Waters re meeting on motion for partial summary judgment and facility inspections; attending to scheduling same.	0.2	
9/12/2023	BBK	Reviewing GCG-R.Steyer comm'ns re mailing to current and former putative class members.	0.1	
9/12/2023	BBK	Drafting/sending email update to RBGG team re: status of expert work for motion for partial summary judgment.	0.2	
9/13/2023	BBK	(Billing Judgment) Reviewing article distributed by GCG re BD's history and growth.	0.0	0.1
9/13/2023	BBK	Preparing for meeting w/ access expert G. Waters re motion for partial summary judgment and re-inspections of facilities.	0.3	
9/13/2023	BBK	Meeting w/ access expert G. Waters re motion for partial summary judgment and re-inspections of facilities.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 723

SERVICES

Date	Person	Description of Services	Hours	Discount
9/14/2023	GCG	Emails to JSY and team re contact w/ deponent and follow up to same.	0.1	
9/14/2023	JSY	Conf. re call from declarant.	0.1	
9/14/2023	JSY	Emails with prior declarant re status.	0.2	
9/14/2023	BBK	Drafting/sending update to GCG/JSY/AX re meetings w/ access experts re: re-inspections and declarations ISO motion for partial summary judgment.	0.2	
9/14/2023	BBK	Preparing Waters Decl ISO partial summary judgment motion.	1.0	
9/14/2023	BBK	Reviewing JSY report re outreach from daughter of BD San Ramon resident / class cert declarant.	0.1	
9/14/2023	BBK	Reviewing/responding to GCG query re status of re-inspections of BD facilities, discovery disputes, and drafting amended complaint.	0.3	
9/15/2023	BBK	Conferring w/ KES re pre-trial deadlines and discovery deadlines.	0.2	
9/15/2023	KES	Calendar discovery deadlines.	0.1	
9/18/2023	GCG	Emails to RA, KES, BBK and AX re deposition summaries and inspections of facilities.	0.3	
9/18/2023	BBK	Conducting legal and factual research for motion for partial summary judgment and expert declarations.	2.0	
9/18/2023	BBK	Reviewing T. Close and R. Steyer emails re inspections and named Pls' depositions; conferring w/ RBGG team re same.	0.2	
9/18/2023	BBK	Emailing w/ GCG re plan for inspections.	0.1	
9/18/2023	AX	Emails with team re update letter to clients, site inspections with experts, partial msj.	0.3	
9/18/2023	KES	Email R. Steyer re status fo depo summaries and review files re same.	0.3	
9/19/2023	GCG	Conf w/ JSY and email to GW and team re expert inspections.	0.2	
9/19/2023	JSY	Conf. w/ GCG re inspections.	0.1	
9/19/2023	BBK	Emailing w/ T. Close, GCG and G. Wallace re: plan for updated site inspections.	0.2	
9/19/2023	BBK	Reviewing GCG-AX emails re letter to named Pls w/ case updates.	0.1	
9/19/2023	BBK	Preparing motion for partial MSJ.	1.0	
9/19/2023	AX	Review docket, transcript from CMC.	0.8	
9/19/2023	AX	Draft update letter to named plaintiffs.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 724

SERVICES

Date	Person	Description of Services	Hours	Discount
9/20/2023	GCG	Review and revise letter to named plaintiffs re trial.	0.1	
9/20/2023	GCG	Conf w/ JSY and emails to AS, GW and team re revisions to same.	0.2	
9/20/2023	JSY	Emails re letter to class members.	0.1	
9/20/2023	BBK	Emailing w/ T. Close re plan for re-inspections of BD facilities.	0.1	
9/20/2023	BBK	Reviewing AX draft letter updating named plaintiffs and GCG-JSY proposed edits to same.	0.1	
9/20/2023	BBK	Conducting research for and drafting motion for partial summary judgment.	2.5	
9/20/2023	AX	Emails re client update letter; update drafts of same.	0.4	
9/21/2023	GCG	Conf w/ BBK and emails to BBK, GW and TC re inspections and motion for summary judgment.	0.3	
9/21/2023	JSY	Emails re inspections and MSJ.	0.1	
9/21/2023	BBK	Phone call w/ GCG re inspections of BD facilities and motion for partial summary judgment.	0.2	
9/21/2023	BBK	Emailing w/ J. Mastin re availability for inspections of BD facilities.	0.2	
9/21/2023	BBK	Drafting/sending report to co-counsel re access expert availability for inspections of BD facilities; emailing w/ M. Johnson re same.	0.4	
9/21/2023	BBK	Drafting/sending email to G. Wallace re approach for motion for partial summary judgment on access barriers at "existing facilities" under ADA.	0.4	
9/21/2023	BBK	Emailing w/ G. Wallace re approach for motion for partial summary judgment on access barriers at "existing facilities" under ADA.	0.5	
9/21/2023	BBK	Drafting/sending report to GCG/JSY re conversation w/ G. Wallace re motion for partial summary judgment; outline for same.	0.4	
9/21/2023	BBK	Researching and drafting motion for partial summary judgment.	2.4	
9/21/2023	BBK	Reviewing/commenting on T. Close draft Rule 34 inspection notice.	0.2	
9/21/2023	AX	Emails re named plaintiff update letters; review mail merged drafts of same and emails to team.	0.4	
9/22/2023	GCG	Participate in strategy meeting w/ Schneider Wallace and BU.	1.1	
9/22/2023	GCG	Follow up touch base meeting w/ BBK. JSY, AX and KES re discovery and SJ.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 725

SERVICES

Date	Person	Description of Services	Hours	Discount
9/22/2023	GCG	Conf w/ and emails to AX re letters to clients re trial date.	0.2	
9/22/2023	GCG	Email re trial date and plan.	0.2	
9/22/2023	GCG	Review memo to file re Brookhurst inspection.	0.1	
9/22/2023	GCG	Emails to GW and team re same and re next inspection.	0.1	
9/22/2023	JSY	Team meeting.	0.4	
9/22/2023	JSY	Emails re memos re site inspections.	0.1	
9/22/2023	BBK	Reviewing AX emails to clients re case status and next steps.	0.1	
9/22/2023	BBK	Following-up w/ G. Waters re availability for re-inspections of BD facilities.	0.1	
9/22/2023	BBK	Meeting w/ co-counsel re preparing amended complaint, renewed class cert motions. and re-inspections of BD facilities.	1.1	
9/22/2023	BBK	RBGG team debrief re co-counsel meeting.	0.3	
9/22/2023	BBK	Setting up co-counsel team meeting for 9/29.	0.1	
9/22/2023	BBK	Researching for motion for partial summary judgment.	0.6	
9/22/2023	BBK	Reviewing/revising AX draft action items for case.	0.1	
9/22/2023	AX	Meeting with cocounsel re amended complaint, motion for class cert, facility inspections, partial msj, and other case strategy and issues.	1.1	
9/22/2023	AX	Meeting with RBGG team re case tasks.	0.2	
9/22/2023	AX	Review meeting notes, identify action items, and related emails with team.	0.4	
9/22/2023	AX	Finalize letters to named plaintiffs and send related correspondence via email and mail.	0.5	
9/22/2023	AX	Call with GCG re case issues.	0.1	
9/22/2023	KES	Participate in Zoom meeting with co-counsel re motions.	1.2	
9/25/2023	BBK	Reviewing/responding to G. Wallace query re construction histories and re-inspections of 6 BD facilities.	0.2	
9/25/2023	BBK	Reviewing G. Wallace proposal re barriers to consider removing from 6 facilities; drafting/sending response to same.	0.4	
9/25/2023	BBK	Analyzing BD's objections and responses to Pls' RFPs Sets 9 and 10; conferring w/ M. Johnson re same.	0.5	
9/25/2023	BBK	Emailing w/ G. Wallace re G. Waters availability for BD facility re-inspections; updating team re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/26/2023	GCG	Emails to GW and team re class members w/ vision disability and issues to raise at discovery meet and confer.	0.4	
9/26/2023	GCG	Review and analyze MJ outline for meet and confer.	0.1	
9/26/2023	JSY	Emails re vision classes.	0.1	
9/26/2023	JSY	Emails re M+C.	0.1	
9/26/2023	BBK	Conferring w/ M. Johnson re proposing inspection dates to Ds for 4 BD facilities w/ named Ps.	0.5	
9/26/2023	BBK	Reviewing M. Johnson - opposing counsel emails re: inspections and 9/27 meet and confer.	0.1	
9/26/2023	BBK	Emailing w/ GW and AX/JSY re whether either named P at BD Scotts Valley has vision disability.	0.2	
9/26/2023	BBK	Phone call w/ P. LIndstrom re: A. Lindstrom's low vision.	0.2	
9/26/2023	BBK	Researching BD records re: A. Lindstrom's vision disability; reporting on same to GW and RBGG team.	0.8	
9/26/2023	BBK	Reviewing/commenting on M. Johnson draft agenda and analysis for 9/27 meet and confer on RFP Sets 9 and 10.	0.8	
9/26/2023	BBK	Emailing w/ M. Johnson/T. Close/GCG re strategy for M&C on RFP Sets 9 and 10.	0.2	
9/26/2023	AX	Call with Bernie Jestrabek-Hart re update.	0.3	
9/26/2023	AX	Update memo re call with Bernie; emails with team re same.	0.3	
9/27/2023	GCG	Email to BBK re revisions to inspection notices.	0.1	
9/27/2023	BBK	Preparing for meet and confer on RFPs Sets 9 and 10.	0.2	
9/27/2023	BBK	Meeting and conferring w/ Ds on RFPs Sets 9 and 10.	0.7	
9/27/2023	BBK	Preparing notes and recommended action items from meet and confer for co-counsel and RBGG team.	1.2	
9/27/2023	BBK	Reviewing AX memo re research into Elder Financial Abuse claim issues.	0.1	
9/27/2023	BBK	Emailing w/ M. Johnson and T. Close re revising Rule 34 inspection notice.	0.2	
9/27/2023	BBK	Reviewing/commenting on updated draft Rule 34 inspection notice; conferring w/ GCG re same.	0.3	
9/27/2023	AX	Research re Elder Financial Abuse statute and related issues.	2.0	
9/28/2023	GCG	Review GW outline of renewed motion for class cert.	0.1	
9/28/2023	GCG	Conf w/ and emails to AX and BBK re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/28/2023	BBK	Emailing co-counsel w/ comments on Rule 34 inspection notice.	0.1	
9/28/2023	BBK	Conferring w/ RBGG team and co-counsel re inspection dates for G. Waters BD facilities.	0.2	
9/28/2023	BBK	Conferring w/ MJ re finalizing/serving inspection notice.	0.1	
9/28/2023	BBK	Conferring w/ GCG/AX re reviewing/commenting on GW draft outline for renewed class cert motion.	0.2	
9/28/2023	BBK	Analyzing/commenting on G. Wallace detailed outline for renewed class cert motion.	0.8	
9/28/2023	BBK	Meeting w/ GCG and AX re plan for co-counsel meeting on 9/29 and comments on outline for renewed class cert motion.	0.3	
9/28/2023	BBK	Prep for 9/29 co-counsel team meeting.	0.2	
9/28/2023	AX	Review draft outline for motion for class certification, including related legal research on standards for renewed motion and other issues.	1.7	
9/28/2023	AX	Call with GCG and BBK re outline and case meeting.	0.2	
9/29/2023	BBK	Reviewing emails from G. Wallace re: RBGG comments on outline for renewed class cert motion.	0.1	
9/29/2023	BBK	Reviewing legal research by Schneider Wallace re district court's obligation to consider sub-classes and to consider reply evidence.	0.3	
9/29/2023	BBK	Conferring w/ AX re prep for co-counsel meeting on class cert motion and amended complaint; debrief w/ AX re same.	0.2	
9/29/2023	BBK	Co-counsel meeting on class cert motion and amended complaint.	1.3	
9/29/2023	BBK	Preparing notes from co-counsel meeting on class cert motion and amended complaint.	0.7	
9/29/2023	BBK	Reviewing AX report to RBGG team re co-counsel meeting on class cert motion and amended complaint.	0.1	
9/29/2023	BBK	Reviewing/commenting on AX draft Elder Abuse Statute narrowed class definition.	0.2	
9/29/2023	BBK	Emailing w/ G. Wallace and M. Johnson re: evidence of H. Carlson's vision disability; researching re same.	0.3	
9/29/2023	AX	Team meeting re class cert motion and other case issues.	1.1	
9/29/2023	AX	Draft memo re team meeting.	0.5	
9/29/2023	AX	Draft subclass definition.	0.1	
9/30/2023	JSY	Emails re KA deposition transcript.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/30/2023	AX	Review emails from team re class cert motion.	0.2	
10/1/2023	GCG	Emails to MJ and team re factual development for renewed class cert motion.	0.2	
10/1/2023	JSY	Emails re community fees.	0.2	
10/1/2023	BBK	Conferring w/ co-counsel and JSY/AX re community fee payments by named Ps.	0.2	
10/1/2023	BBK	Conferring w/ AX re identifying H. Carlson medical records to demonstrate low vision.	0.1	
10/1/2023	BBK	(Billing Judgment) Outreach to R. Bonner re getting access to Relativity for document review.	0.0	0.1
10/1/2023	AX	Review emails from team re class cert motion.	0.3	
10/2/2023	GCG	Review and analyze GW emails regarding named plaintiffs' disabilities.	0.2	
10/2/2023	GCG	Emails to RBGG team re further factual and legal research for class cert motion.	0.2	
10/2/2023	JSY	Emails re named plaintiff disabilities and community fees.	0.2	
10/2/2023	JSY	Further emails re class cert.	0.2	
10/2/2023	BBK	Reviewing emails w/ co-counsel re community fees and arbitration opt-outs of current and former named Ps.	0.1	
10/2/2023	BBK	(Billing Judgment) Conferring w/ AX re access to Relativity for doc analysis.	0.0	0.2
10/2/2023	BBK	(Billing Judgment) Conferring w/ KES by phone and email re Relativity access for doc analysis and searching records to assess vision impairments of named Pls.	0.0	0.3
10/2/2023	BBK	(Billing Judgment) Attending to obtaining Relativity access and trouble-shooting problems with same (including multiple emails w/ R. Bonner and JNE discovery IT re same).	0.0	0.9
10/2/2023	BBK	Conducting factual research and analysis re: two named Ps' vision impairments and one named Pls' potential mobility disability; reporting on same to co-counsel and RBGG team.	1.1	
10/2/2023	BBK	Conferring w/ AX re Community Fee payments by named Ps; reviewing AX research and conclusions re same.	0.2	
10/2/2023	BBK	Emailing w/ co-counsel and RBGG team re amendment to complaint and renewed class cert motion.	0.1	
10/2/2023	BBK	Emailing w/ RBGG team re meeting on 10/3 to check-in on assignments.	0.1	
10/2/2023	AX	Emails re Fourth Amended complaint.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 729

SERVICES

Date	Person	Description of Services	Hours	Discount
10/2/2023	AX	Review community fees information and update memo; correspondence with team re same.	1.2	
10/2/2023	AX	Review emails re class reps and mobility/vision disabilities.	0.2	
10/2/2023	KES	Review files re client documents and confer BBK re same.	0.4	
10/3/2023	GCG	Meet w/ BBK and AX to discuss legal research and declarations for renewed motion for class certification.	0.5	
10/3/2023	GCG	Revise memo re damages for Elder abuse claims.	0.3	
10/3/2023	GCG	Conf w/ and emails to AX re same and re exhibits to Wallace declaration.	0.2	
10/3/2023	GCG	Conf w/ GW re overall strategy for class cert motion.	0.2	
10/3/2023	GCG	Conf w/ BU re named plaintiff mobility issues.	0.1	
10/3/2023	GCG	Review and respond to emails re fact section of class cert motion.	0.3	
10/3/2023	GCG	Conf w/ JSY and email to team re sealing motion for renewed motion.	0.2	
10/3/2023	GCG	Research and draft email re related injunctive relief case implications.	0.2	
10/3/2023	JSY	Conf. w/ GCG re status and emails re same.	0.2	
10/3/2023	BBK	Meeting w/ GCG and AX re key case tasks for amended complaint and renewed class cert motion.	0.3	
10/3/2023	BBK	Conferring w/ KES re identifying new DSS citations to the 4 Brookdale facilities where named Ps reside.	0.2	
10/3/2023	BBK	Combine BBK Decl for class cert and for reply to be updated for renewed motion for class cert.	0.5	
10/3/2023	BBK	Calculating deadline for Ds to respond to notice of inspection.	0.1	
10/3/2023	BBK	Updating RBGG team re T. Close's updated access barriers spreadsheet for amended complaint.	0.1	
10/3/2023	BBK	Revising BBK Decl ISO renewed class cert motion.	0.5	
10/3/2023	BBK	Reviewing/responding to AX report re treble damages under Elder Financial Abuse Statute (including legal research to respond to same).	0.4	
10/3/2023	BBK	Reviewing M. Johnson follow-up meet and confer email w/ Ds re staffing formula.	0.1	
10/3/2023	BBK	Emailing w/ GCG and AX re status of BBK Decl and preparing Wallace Decl and draft SOF.	0.1	
10/3/2023	AX	Meeting with BBK, GCG re motion for certification of subclasses and case tasks.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/3/2023	AX	Research and emails with team re Elder Financial Abuse statute.	1.8	
10/3/2023	AX	Review statement of facts; begin Wallace declaration.	1.0	
10/3/2023	KES	Review, download and summarize DSS citations and reports for six facilities since April 2022.	1.5	
10/3/2023	KES	Online research re case for draft brief.	0.4	
10/3/2023	DLE	Review legal research case info, relay to team.	0.6	
10/4/2023	GCG	Emails to GW and team re overall strategy and approach to fourth amended complaint and motion for class cert.	0.3	
10/4/2023	GCG	Confs w/ AX re Wallace declaration and named plaintiff declarations.	0.2	
10/4/2023	GCG	Conf w/ HF re RS disabilities; review and analyze Barrier list for fourth amended complaint.	0.2	
10/4/2023	GCG	Email to KES and team re call w/ HF.	0.1	
10/4/2023	AX	Call with GCG and related emails re named plaintiff barriers list for fourth amended complaint.	0.2	
10/4/2023	AX	Call with GCG re class rep declarations, renewed motion for class cert filing, and other case tasks.	0.2	
10/4/2023	KES	Review produced documents to confirm named plaintiff disabilities.	0.7	
10/5/2023	GCG	Review and revise class member declaration in support of class cert motion.	0.3	
10/5/2023	GCG	Review and revise fourth amended complaint.	0.5	
10/5/2023	GCG	Confs w/ AX and emails to MJ, GW and team re same.	0.2	
10/5/2023	GCG	Review cover emails to defendants re additional pages and 4th amended complaint.	0.1	
10/5/2023	AX	Call with GCG re cocounsel email drafts, review of same.	0.2	
10/5/2023	AX	Emails with cocounsel re fourth amended complaint.	0.3	
10/5/2023	AX	Review and revise Fourth Amended Complaint, emails and call with GCG re same.	1.8	
10/5/2023	AX	Draft sample declaration and emails/call with GCG, team re same.	1.0	
10/6/2023	GCG	Prepare for and participate in meeting w/ co-counsel to plan for motion for sub classes.	1.1	
10/6/2023	GCG	Conf w/ JSY and email to team re declarations needed for same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/6/2023	GCG	Emails to GW, AX and team re meaning of elder abuse statute and need for further research.	0.2	
10/6/2023	JSY	Conf. w/ GCG re renewed class cert motion.	0.2	
10/6/2023	JSY	Team meeting re renewed class cert motion.	1.5	
10/6/2023	JSY	Emails re tasks for class cert filing.	0.2	
10/6/2023	JSY	Research re elder abuse statute and emails re same.	1.5	
10/6/2023	AX	Brookdale team meeting with cocounsel.	1.0	
10/6/2023	AX	Meeting with RBGG team re case tasks.	0.4	
10/6/2023	AX	Emails re Elder FInancial Abuse subclass and claims forms.	0.3	
10/6/2023	AX	Legal research re renewed motion for class certification standard and review of related section of brief.	3.5	
10/6/2023	KES	Review initial draft of Wallace decl and begin gathering exhibits; create initial index for same and check sealing and redaction status.	2.0	
10/6/2023	KES	Participate in team Zoom meeting re motion to certify subclasses.	1.0	
10/6/2023	KES	Follow up with co-counsel office re Relativity access.	0.3	
10/7/2023	GCG	Review and analyze GW and MJ emails re plan for renewed motion.	0.1	
10/7/2023	AX	Emails re Elder Financial Abuse subclass and claims forms.	0.1	
10/8/2023	GCG	Review further emails from AX and JSY re attorney declarations.	0.1	
10/8/2023	AX	Update filing checklist and emails re same.	0.5	
10/8/2023	AX	Research standard for motion for certification of subclasses; revise section of brief; email with team re same.	1.7	
10/9/2023	GCG	Texts and emails w/ JSY and team re email from child of putative class member and renewed motion.	0.2	
10/9/2023	JSY	Multiple conf. w/ AX re documents for renewed class cert filing.	0.7	
10/9/2023	JSY	Review and edit named plaintiff declarations.	0.2	
10/9/2023	JSY	Research and draft section re elder abuse statute and edit other sections of brief.	3.7	
10/9/2023	JSY	Review edits to section of brief; emails re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 732

SERVICES

Date	Person	Description of Services	Hours	Discount
10/9/2023	BBK	Reviewing emails and draft docs w/ co-counsel for renewed class cert motion and supporting pleadings (including re: Elder Abuse Claim, draft Introduction for motion, and draft class rep decls).	0.5	
10/9/2023	BBK	Reviewing comm'ns w/ co-counsel re draft 4th Amended Complaint and barriers list exhibit; reviewing M. Johnson - E. Rutner emails re request that Ds stip to filing of same.	0.2	
10/9/2023	BBK	Reviewing comm'ns w/ co-counsel re requesting expansion of page limits for renewed class cert motion; reviewing M. Johnson - E Rutner emails re stipulating to same.	0.1	
10/9/2023	BBK	Reviewing comm'ns w/ co-counsel re draft joint discovery letter brief to compel production of staffing formula.	0.1	
10/9/2023	BBK	Conferring w/ JSY and AX re check-in on BD tasks for 10/19 filings and outreach to named Ps for class rep decls.	0.1	
10/9/2023	AX	Draft class rep declarations and related review of case file re mobility and vision disabilities.	0.8	
10/9/2023	AX	Legal research re motion for subclasses standard.	1.5	
10/9/2023	AX	Call with JSY re case projects, section of brief.	0.5	
10/9/2023	AX	Call with JSY re case projects.	0.2	
10/9/2023	AX	Review insert on Elder Financial Abuse statute and revise.	0.5	
10/9/2023	KES	Review prior sealing orders and omnibus sealing motion, declarations and docket to determine most current version of documents filed under seal in opening and reply class certification in preparation for motion to certify subclasses.	2.7	
10/10/2023	GCG	Emails to GW and JSY re contact from putative class member at San Ramon.	0.1	
10/10/2023	JSY	RBGG team meeting re status of documents for renewed class cert motion.	0.4	
10/10/2023	JSY	Review and edit admin motion re page limit.	0.2	
10/10/2023	JSY	Emails re fourth amended complaint.	0.2	
10/10/2023	JSY	Email and call to JA.	0.2	
10/10/2023	JSY	Emails re new plaintiffs.	0.1	
10/10/2023	BBK	Emailing w/ JSY/AX/KES re meeting on tasks for motion for certification of subclasses and fourth amended complaint.	0.1	
10/10/2023	BBK	Reviewing AX draft class rep decls for Lindstrom and Carlson; conferring w/ co-counsel and team re class rep decls.	0.2	
10/10/2023	BBK	Meeting w/ JSY and AX re tasks for motion for certification of subclasses and fourth amended complaint.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/10/2023	BBK	Emailing co-counsel re proposed order granting class cert motion; reviewing AX email to co-counsel re preparing updated facility barrier lists.	0.1	
10/10/2023	BBK	Emailing JSY and AX re contents of proposed order for motion for leave to file motion to certify subclasses.	0.1	
10/10/2023	BBK	Reviewing M. Johnson draft admin motion for leave to exceed 25-page limit and JSY comments thereon.	0.2	
10/10/2023	BBK	Reviewing M. Johnson- E. Rutner emails re whether Ds will stipulate to filing of fourth amended complaint; conferring w/ RBGG team and co-counsel re same.	0.2	
10/10/2023	BBK	Drafting BBK declaration ISO motion for certification of subclasses (including analyzing new DSS citations); emailing w/ JSY and AX re recommendations re same.	2.9	
10/10/2023	KES	Download and circulate pleadings.	0.1	
10/10/2023	KES	Review named plaintiff produced docs re information re disability.	0.8	
10/11/2023	JSY	Calls with JA re declaration.	0.2	
10/11/2023	JSY	Team meeting incl. RBGG only team meeting.	1.2	
10/11/2023	JSY	Emails re review of brief.	0.1	
10/11/2023	JSY	Review and edit BBK declaration.	0.3	
10/11/2023	JSY	Emails re other documents re subclass motion.	0.4	
10/11/2023	JSY	Review and edit brief and GBW declaration; emails re same.	1.2	
10/11/2023	BBK	Emailing w/ co-counsel re draft motion for leave to file motion for certification of subclasses.	0.2	
10/11/2023	BBK	Meeting w/ co-counsel re preparing 10/19 filings; JSY/AX/KES debrief meeting re same.	1.2	
10/11/2023	BBK	Reviewing/responding to JSY comments on draft BBK decl for motion to certify subclasses.	0.3	
10/11/2023	BBK	Outreach to P. Lindstrom and J. Carlson re class rep declarations by phone and email; updating JSY/AX re same.	0.5	
10/11/2023	BBK	Reviewing/responding to KES and R. Steyer questions re medical records re E. Boris and S. Stiner visual impairments for access barrier lists.	0.2	
10/11/2023	BBK	Drafting email to co-counsel re: BBK Decl ISO motion to certify subclasses.	0.1	
10/11/2023	BBK	Emailing w/ KES re updated index of DSS citations and pulling exhibits for BBK Decl.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/11/2023	BBK	Preparing revised updated index of DSS citations for BBK Decl.	0.4	
10/11/2023	BBK	Preparing shell pleading for proposed order granting motion re subclasses.	0.1	
10/11/2023	BBK	Emailing w/ JSY and AX re draft Wallace Decl ISO motion to certify subclasses.	0.1	
10/11/2023	BBK	Reviewing M. Johnson draft stipulation to file fourth amended complaint; emails w/ E. Rutner re same.	0.1	
10/11/2023	BBK	Follow-up emails to J. Carlson and P. Lindstrom to go over class rep decls.	0.1	
10/11/2023	BBK	Reviewing/revising/commenting on draft MPA ISO motion for leave to file motion to certify subclasses.	1.8	
10/11/2023	BBK	Emailing w/ JSY re high-level comments on draft MPA ISO motion for leave to file motion to certify subclasses.	0.2	
10/11/2023	AX	Emails re motion draft.	0.1	
10/11/2023	AX	Emails re expert reports for motion.	0.3	
10/11/2023	AX	Review draft of motion.	0.3	
10/11/2023	AX	Meeting with cocounsel and team re motion progress and case updates.	1.3	
10/11/2023	AX	Email with DE re case background mtg.	0.1	
10/11/2023	AX	Revise Wallace declaration.	1.8	
10/11/2023	AX	Email correspondence to team re Wallace declaration and class cert order.	0.5	
10/11/2023	KES	Participate in Zoom with co-counsel re motion to certify subclasses.	1.2	
10/11/2023	KES	Review produced documents to confirm various named plaintiff disability status docs.	0.8	
10/11/2023	KES	Emails BBK re exhibits for motion to certify subclasses.	0.2	
10/12/2023	GCG	Emails to ER, MJ and JSY re amending complaint and Wallace declaration.	0.2	
10/12/2023	JSY	Conf. w/ ML re declaration.	0.3	
10/12/2023	JSY	Conf. w/ AX re status of declarations.	0.2	
10/12/2023	JSY	Emails re finalizing declarations.	0.4	
10/12/2023	BBK	Conferring w/ co-counsel and AX re revising class rep decls.	0.1	
10/12/2023	BBK	Conferring w/ JSY and AX re draft Wallace Decl and RBGG comments on draft brief.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/12/2023	BBK	Conferring w/ JSY and AX re obtaining class rep decls from named Ps.	0.2	
10/12/2023	BBK	Emailing w/ J. Carlson and P. Lindstrom re calls to go over and finalize class rep decls.	0.3	
10/12/2023	BBK	Reviewing draft Marquis Decl ISO motion for certification of subclasses.	0.2	
10/12/2023	BBK	Conferring w/ AX/JSY/KES re DE working on exhibits for decls ISO motion for certification of subclasses.	0.1	
10/12/2023	BBK	Preparing assignment for DE to create exhibits for BBK Decl ISO motion for subclasses.	0.2	
10/12/2023	BBK	Conferring w/ DE by phone and email re creating exhibits for BBK Decl ISO motion for subclasses.	0.3	
10/12/2023	BBK	Drafting proposed order granting motion for leave and motion to certify subclasses.	1.2	
10/12/2023	BBK	Conferring w/ RBGG team re outreach from son of BD San Ramon current resident.	0.1	
10/12/2023	AX	(Billing Judgment) Meeting with DE re case intro.	0.0	0.5
10/12/2023	AX	Review Wallace declaration and send to team; related emails with team.	0.5	
10/12/2023	AX	Call with LV.	0.2	
10/12/2023	AX	Revise declaration and related email with LV.	0.3	
10/12/2023	AX	Call with Bernie Jestrabek-Hart re case status and declaration.	0.2	
10/12/2023	AX	Call with Heather Fisher and related correspondence re declaration.	0.3	
10/12/2023	KES	Gather prior filed versions of BBK decl exhibits and confer DE re preparation of new set for motion to certify subclasses and re formatting issues; confer team re same.	2.3	
10/12/2023	DLE	(Billing Judgment) Confer with AX regarding case introduction.	0.0	0.5
10/12/2023	DLE	Confer with KES re task compiling exhibits.	0.4	
10/12/2023	DLE	Rename, compile, and process BBK exhibits for filing.	1.9	
10/13/2023	JSY	Conf. w/ JA re declaration.	0.2	
10/13/2023	JSY	Emails re class rep declarations.	0.3	
10/13/2023	JSY	Review and edit PO.	0.2	
10/13/2023	JSY	Team meeting.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/13/2023	JSY	Draft FN re preservation of appeal rights; emails re same.	0.3	
10/13/2023	BBK	Reviewing order granting stipulation re filing 4th Amended Complaint and filing of same.	0.1	
10/13/2023	BBK	Reviewing AX-G. Wallace comm'ns re MPA and Wallace Decl. for motion for certification of subclasses; JSY draft footnote for brief reserving rights to appeal denial of original cert motion.	0.2	
10/13/2023	BBK	Reviewing/responding to JSY comments on draft proposed order; emailing w/ JSY re same.	0.3	
10/13/2023	BBK	Emailing draft proposed order to co-counsel and email query re class definitions.	0.1	
10/13/2023	BBK	Conferring w/ RBGG team and co-counsel re class rep decls.	0.1	
10/13/2023	BBK	Preparing for call w/ P. Lindstrom re class rep decl.	0.2	
10/13/2023	BBK	Phone call w/ P. Lindstrom re class rep decl.	0.4	
10/13/2023	BBK	Attending to preparing decl to P. Lindstrom for her via DocuSign.	0.2	
10/13/2023	BBK	Meeting w/ co-counsel re preparing motion to certify subclasses and supporting pleadings.	0.8	
10/13/2023	BBK	Preparing excerpts from draft BBK Decl re DSS citations for inclusion in Flores Expert Decl; emailing w/ B. Umpierre re same.	0.2	
10/13/2023	AX	Emails re Brookdale filing, including class rep declarations, status of projects.	0.3	
10/13/2023	AX	Emails re Wallace declaration.	0.2	
10/13/2023	AX	Call with KES re Wallace declaration exhibits.	0.2	
10/13/2023	AX	Team meeting with cocounsel re status of filing.	0.7	
10/13/2023	AX	Review brief, Wallace declaration and revise citations.	3.0	
10/13/2023	KES	Team Zoom re motion to certify subclasses.	0.6	
10/13/2023	KES	Review previously filed documents and determine from which sets to pull Wallace exhibits; confer AX re same; email team re same.	0.9	
10/13/2023	KES	Review draft Wallace decl, prepare index of exhibits with sealing and redaction status and confer DE re pulling exhibits.	1.8	
10/13/2023	DLE	Finish formatting BBK declaration for upcoming filing.	0.5	
10/13/2023	DLE	Organizing exhibits training with KES.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/13/2023	DLE	Team meeting with co-counsel to discuss case tasks for upcoming filing.	0.8	
10/13/2023	DLE	Organizing exhibits task for declaration for upcoming filing.	1.1	
10/13/2023	DLE	Continued exhibit task for declaration for upcoming filing.	1.1	
10/14/2023	AX	Review Brookdale team emails and draft of brief.	0.3	
10/15/2023	GCG	Email w/ JSY re plan for renewed motion for class certification.	0.2	
10/15/2023	JSY	Emails re status of subclass cert motion.	0.2	
10/15/2023	KES	Gather Wallace exhibits ISO motion to certify subclasses that were redacted per prior court order and cross check with Def prior declaration re same.	2.0	
10/16/2023	GCG	Conf w/ JSY and emails to BBK, GW, AX and RS re pleadings ISO motion for subclasses.	0.3	
10/16/2023	JSY	Emails re sealing motion.	0.2	
10/16/2023	JSY	Emails re status of brief.	0.1	
10/16/2023	JSY	Conf. w/ GCG re status of motion.	0.2	
10/16/2023	JSY	Emails re status of motion and other documents.	0.1	
10/16/2023	BBK	Conferring w/ RBGG team re preparing sealing pleadings for motion to certify subclasses and status of brief and Wallace Decl.	0.3	
10/16/2023	BBK	Reviewing M. Johnson revised draft discovery letter brief to compel production of staffing formula and RS comments on same.	0.1	
10/16/2023	BBK	Revising BBK Decl and Index of DSS citations; reviewing/approving DE preparing of 594 DSS report exhibits to same; emailing w/ co-counsel and DE re finalizing BBK Decl.	1.0	
10/16/2023	BBK	Phone call w/ AX re plan for motion to certify subclasses and supporting pleadings.	0.3	
10/16/2023	BBK	Phone call and emails w/ KES re sealing motion and supporting pleadings; preparing same.	1.4	
10/16/2023	BBK	Phone call w/ J. Carlson and R. Carlson re class rep declarations (including prep for same).	0.5	
10/16/2023	BBK	Preparing final J. Carlson and R. Carlson class rep decls and attending to submission to them for execution via DocuSign.	0.3	
10/16/2023	BBK	Emailing w/ P. Lindstrom, R. Carlson and J. Carlson re executed class rep decls.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/16/2023	BBK	Preparing exhibits to R. Carlson and J. Carlson decls and finalizing decls for filing.	0.2	
10/16/2023	BBK	Reviewing/commenting on DSS citation section of Flores Expert Decl.	0.3	
10/16/2023	BBK	Reviewing signed decl from putative class rep for facility subclass; conferring w/ team re appendix of class decls.	0.2	
10/16/2023	BBK	Conferring w/ KES and DE re tasks for DE for preparing exhibits and pleadings for 10/19 filing.	0.2	
10/16/2023	BBK	Reviewing/responding to R. Steyer questions re class rep decls.	0.2	
10/16/2023	BBK	Conferring w/ AX re status of Wallace Decl and class rep decls.	0.2	
10/16/2023	BBK	Emailing w/ JSY re admin motion for extra pages for motion to certify subclasses.	0.1	
10/16/2023	AX	Finalize class member representative declarations, including emails with Heather Fisher.	0.4	
10/16/2023	AX	Revise Wallace declaration.	0.6	
10/16/2023	AX	Email to team re status of projects for filing.	0.5	
10/16/2023	KES	Supervise preparation of Admin Motion to Seal Defs Materials; confer BBK re same; check local rules re same.	0.9	
10/16/2023	KES	Gather photo sets for 6 facilities to attach to expert reports re motion to certify subclasses.	0.8	
10/16/2023	KES	Confer DE re redactions to Wallace Decl exhibits.	0.4	
10/16/2023	KES	Review updated Wallace Decl, gather additional exhibits check against prior proposed order re sealing, and update index indicating status of sealing and redactions.	3.0	
10/16/2023	KES	Emails with team re status of exhibits and other documents.	0.3	
10/16/2023	KES	Confer DE re BBK exhibits and further formatting issues.	0.4	
10/16/2023	DLE	(Billing Judgment) Redaction training with KES.	0.0	0.5
10/16/2023	DLE	Redact exhibits for upcoming filing.	2.1	
10/17/2023	GCG	Meet w/ co-counsel and RBGG team to plan pleadings and filing.	0.8	
10/17/2023	GCG	Review and revise draft motion for leave to seek subclasses.	1.4	
10/17/2023	GCG	Email to GW and team re same.	0.2	
10/17/2023	GCG	Confs w/ JSY and KES and emails to BBK and team re sealing motion and other pleadings.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 739

SERVICES

Date	Person	Description of Services	Hours	Discount
10/17/2023	JSY	Call with potential witness.	0.5	
10/17/2023	JSY	Team meeting.	0.8	
10/17/2023	JSY	Emails with courtroom deputy re admin motion re page limit.	0.1	
10/17/2023	JSY	Emails re insertions in brief.	0.1	
10/17/2023	JSY	Edit GBW declaration; emails re same.	0.5	
10/17/2023	JSY	Research for brief; emails re same.	0.3	
10/17/2023	JSY	Conf. w/ GCG re motion status and new named plaintiffs.	0.3	
10/17/2023	BBK	Reviewing comm'ns w/ H. Fisher re class rep decl.	0.2	
10/17/2023	BBK	Analyzing/revising chart of DSS citations indicative of caregiver understaffing for Flores Expert Decl; conferring w/ B. Umpierre re same.	0.6	
10/17/2023	BBK	Meeting w/ co-counsel re preparing motion to certify subclasses.	0.7	
10/17/2023	BBK	Reviewing M&C emails between E. Rutner and M. Johnson re discovery disputes to MJ Beeler.	0.1	
10/17/2023	BBK	Conferring w/ JSY re updating Wallace Decl to add more exhibits cited in MPA.	0.2	
10/17/2023	BBK	Conferring w/ co-counsel re: additional/revisions to brief and revised Wallace Decl.	0.1	
10/17/2023	BBK	Conferring w/ KES re exhibits to BBK Decl and photos for Mastin and Waters Decls.	0.1	
10/17/2023	BBK	Drafting sealing pleadings and Appendix A; conferring w/ RBGG team re same.	2.5	
10/17/2023	BBK	Conferring w/ KES re unredacted and redacted exhibits to Wallace Decl.	0.1	
10/17/2023	BBK	Reviewing updated draft MPA and GCG comments thereon.	0.6	
10/17/2023	KES	Prepare redacted set of Wallace exhibits 1-68 and check against prior sealing orders, revise Bien-Kahn exhibits; confer DE re combining under seal Wallace exhibits.	6.0	
10/17/2023	KES	Participate in team Zoom re motion to certify subclasses.	1.0	
10/17/2023	DLE	Team meeting with co-counsel to discuss case tasks for upcoming filing.	0.7	
10/17/2023	DLE	Formatting task for BBK declaration for upcoming filing.	0.5	
10/17/2023	DLE	Organize exhibit slipsheets for declaration for upcoming filing.	1.6	
10/18/2023	GCG	Confs w/ JSY, BBK and KES and emails to GW and team re finalizing pleadings for motion for leave to seal subclasses.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/18/2023	JSY	Team meeting re status.	0.5	
10/18/2023	JSY	Review and edit sealing pleadings; conf. w/ BBK re same.	0.6	
10/18/2023	JSY	Emails re discovery dispute briefing.	0.1	
10/18/2023	JSY	Edit and review documents for motion filing; emails re same.	2.7	
10/18/2023	BBK	Reviewing order granting admin motion for leave to file 35 page brief; conferring w/ team re same.	0.1	
10/18/2023	BBK	Revising sealing pleadings; conferring w/ JSY and KES re same.	0.6	
10/18/2023	BBK	Meeting w/ co-counsel re motion for certification of subclasses.	0.5	
10/18/2023	BBK	Cite-checking and identifying redactions for Wallace Declaration (including conferring w/ RBGG team re same).	3.1	
10/18/2023	BBK	Emailing w/ B. Umpierre re redactions for expert decls.	0.2	
10/18/2023	BBK	Conferring w/ KES re redactions to Jones Expert Decl; reviewing/approving proposed redactions to same and emailing co-counsel re same.	0.6	
10/18/2023	BBK	Revising/finalizing supporting papers for motion and comm'ns w/ RBGG team re plan for and progress on same (including Mastin and Waters Decls, class rep decls, BBK Decl, cite-checking brief).	1.3	
10/18/2023	BBK	Revising proposed order and conferring w/ GW re changes to same (including emails w/ co-counsel and RBGG team re class defs and class reps for each subclass).	1.5	
10/18/2023	KES	Prepare draft exhibits for Waters and Mastin declarations.	1.5	
10/18/2023	KES	Team Zoom re motion to certify subclasses.	0.5	
10/18/2023	KES	Review and revise redactions to Jones and Wallace declarations, revise Wallace exhibits, revise multiple pleading caption pages.	4.8	
10/18/2023	KES	Review location efiling procedures and categories re admin motion to seal and motion for leave.	0.4	
10/18/2023	DLE	Team meeting to discuss case tasks for upcoming filing.	0.4	
10/18/2023	DLE	Formatting declarations for upcoming filing.	3.0	
10/18/2023	DLE	Review and redact declarations for upcoming filing.	1.5	
10/19/2023	GCG	Confs w/ JSY and emails to JSY and team re finalizing and filing pleadings in support of motion for leave to seal subclasses.	0.8	
10/19/2023	JSY	Conf. w/ GCG re status.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 741

SERVICES

Date	Person	Description of Services	Hours	Discount
10/19/2023	JSY	Conf. w/ BBK re status.	0.4	
10/19/2023	JSY	Continued work on documents re motion for subclasses; conf. w/ team re same.	2.5	
10/19/2023	JSY	Editing and finalizing all documents for filing; filing same; emails and conf. re same.	4.9	
10/19/2023	BBK	Conferring w/ co-counsel re emails w/ defense counsel re: joint discovery ltr brief; reviewing M. Johnson - E. Rutner emails re same.	0.1	
10/19/2023	BBK	Meeting w/ co-counsel re today's filing.	0.2	
10/19/2023	BBK	Conducting cite-check for MPA ISO motion for certification of subclasses for Wallace and BBK Decl cites.	1.9	
10/19/2023	BBK	Preparing associated pleadings for motion for certification of subclasses (including drafting/revising and redacting pleadings; conferring w/ team re same).	7.5	
10/19/2023	KES	Efile admin motion to seal and motion for leave to file motion to certify subclasses and serve under seal documents.	1.0	
10/19/2023	KES	Review, revise, redact and finalize declarations and exhibits in support of motion to certify subclasses and admin motion to seal.	8.2	
10/19/2023	DLE	Team meeting to discuss case tasks for upcoming filing.	0.2	
10/19/2023	DLE	Formatting declarations for upcoming filing.	3.0	
10/19/2023	DLE	Redact exhibits for upcoming filing.	1.0	
10/19/2023	DLE	Format and redact exhibits and declarations for upcoming filing.	2.0	
10/20/2023	GCG	Review defendants' notice of Intent to Strike.	0.3	
10/20/2023	GCG	Confs w/ JSY and BBK and email to GW and MJ re same.	0.4	
10/20/2023	JSY	Emails and conf. w/ GCG re subclasses certification motion.	0.2	
10/20/2023	JSY	Multiple conf. w/ AX, GCG, KES re notice of motion and issues with briefing schedule for motion for certification of subclasses.	0.5	
10/20/2023	JSY	Multiple emails re issue with motion hearing and notice.	0.4	
10/20/2023	JSY	Review Defs' notice re motion to strike.	0.1	
10/20/2023	JSY	Edit Notice of Motion.	0.1	
10/20/2023	BBK	Conferring w/ RBGG team and co-counsel re noticing hearing date for motion for leave to file motion for certification of subclasses per court's order; reviewing AX draft notice and co-counsel comments thereon.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/20/2023	BBK	Reviewing Ds' notice of intent to move to strike portions of Pls' motion for certification of subclasses; conferring w/ co-counsel re same.	0.2	
10/20/2023	AX	Discuss case developments, filing, and notice of motion.	0.3	
10/20/2023	AX	Review motion for certification of subclasses filing.	0.5	
10/20/2023	AX	Draft notice of motion; emails with team re same; coordinate filing.	1.0	
10/20/2023	KES	Download and organize voluminous filed motion to certify subclasses and admin motion.	1.7	
10/20/2023	KES	Download and circulation court notices and def notice.	0.3	
10/20/2023	KES	Team emails re filing notice re hearing.	0.5	
10/20/2023	KES	Efile notice of motion and confer AX re same; download and circulate and calendar hearing date.	0.4	
10/23/2023	GCG	Initial review of defendants' motion for sanctions.	0.2	
10/23/2023	GCG	Conf w/ JSY re discovery issues.	0.1	
10/23/2023	GCG	Email to MJ, GW and ER re briefing schedule on motion to strike.	0.1	
10/23/2023	JSY	Conf. w/ GCG re discovery issues.	0.1	
10/23/2023	BBK	Reviewing emails between M. Johnson and Ds re under seal filing and joint discovery letter brief.	0.1	
10/23/2023	BBK	Reviewing comm'ns w/ opposing counsel re Motion to Strike and Motion for Sanctions.	0.2	
10/23/2023	KES	Download and circulate pleadings.	0.4	
10/24/2023	GCG	Confs w/ JSY and GW re approach to defendants' motions to strike and for sanctions.	0.4	
10/24/2023	GCG	Emails to AX and team re plan for opposition and dates to calendar.	0.1	
10/24/2023	GCG	Emails to BBK and JSY re defendants' request to seal Bowman deposition.	0.1	
10/24/2023	GCG	Emails to MJ and ER re proposal to move motion opposition and avoid need for motion to shorten time.	0.2	
10/24/2023	GCG	Email consultant SS re status.	0.1	
10/24/2023	JSY	Emails re sealing.	0.3	
10/24/2023	JSY	Conf. w/ GCG re motion to strike and motion for sanctions.	0.3	
10/24/2023	JSY	Review motions to strike and for sanctions; emails re same.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 743

SERVICES

Date	Person	Description of Services	Hours	Discount
10/24/2023	JSY	Emails re sealing and schedule for motions.	0.4	
10/24/2023	BBK	Reviewing Ds' Admin Motion to Shorten Time for Motion to Strike hearing.	0.1	
10/24/2023	BBK	Emailing w/ co-counsel and conferring w/ RBGG team re plan for opposing motion to strike and motion for sanctions.	0.2	
10/24/2023	BBK	Researching/drafting email response to Ds re Admin Motion to Consider Whether to File Ds' Materials Under Seal.	1.7	
10/24/2023	BBK	Emailing w/ JSY and co-counsel re emailing Ds' re prior sealing pleadings.	0.1	
10/24/2023	BBK	Conferring w/ co-counsel re alternative proposal to Ds re briefing schedules for pending motions; reviewing E. Rutner - M. Johnson comm'ns re same.	0.2	
10/24/2023	BBK	Conferring w/ co-counsel re producing underlying data relied upon by Pls' experts; reviewing M. Johnson emails to opposing counsel re same.	0.1	
10/24/2023	BBK	Conferring w/ co-counsel re M. Johnson draft Stip re briefing schedule on pending motions.	0.1	
10/24/2023	BBK	Analyzing J. Bertino follow-up email re Ds' changed position on sealing; conferring w/ JSY re same.	0.3	
10/24/2023	BBK	Drafting email response to J. Bertino re sealing pleadings; conferring w/ JSY and emailing co-counsel re same.	0.6	
10/24/2023	AX	Email re contacting putative class member.	0.1	
10/24/2023	KES	Download and circulate pleadings.	0.2	
10/24/2023	KES	Calendar deadlines for motion to strike, motion for sanctions and admin motion.	0.4	
10/25/2023	GCG	Conf w/ JSY, BBK, AX and KES re opposition to motion for sanctions and defendants' sealing requests.	0.4	
10/25/2023	GCG	Email from GW re motion to strike.	0.1	
10/25/2023	GCG	Emails to JSY and BBK re motion to remove documents and sealing issues.	0.3	
10/25/2023	JSY	Meeting re sanctions motion and sealing issues.	0.6	
10/25/2023	JSY	Emails re sealing issues; conf. w/ GCG re same.	0.3	
10/25/2023	JSY	Review sealing pleadings; emails re same; conf. w/ KES re same.	0.4	
10/25/2023	BBK	Emailing w/ J. Bertino re whether materials should have been conditionally filed under seal.	0.2	
10/25/2023	BBK	Reviewing/revising Ds' draft stipulation re omnibus sealing motion; conferring w/ co-counsel and RBGG team re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/25/2023	BBK	Reviewing J. Bertino email re ND Cal procedure for removing incorrectly filed docs; conferring w/ AX and KES re same.	0.3	
10/25/2023	BBK	Meeting w/ GCG/JSY/AX/KES re addressing Ds' position on sealing of additional docs and plan for opposing motion for sanctions.	0.3	
10/25/2023	BBK	Phone call w/ KES re addressing Ds' request re: additional sealing/redactions and plan for same.	0.4	
10/25/2023	BBK	Planning/preparing/drafting proposed response to Ds re sealing issues.	0.6	
10/25/2023	BBK	Attending to emails w/ ND Cal ECF Help Desk and docketing clerk to temporarily restrict access to ECF 650-3.	0.2	
10/25/2023	BBK	Drafting motion to remove incorrectly filed doc and revised admin motion re sealing Ds' materials w/r/t four Wallace Decl Exhibits filed publicly (and supporting pleadings).	1.8	
10/25/2023	BBK	Reviewing J. Bertino demanding restriction of access to full Wallace Decl and 5 expert declarations; planning/proposing response to same.	0.5	
10/25/2023	BBK	Attending to additional phone call and email to ND Cal ECF Help Desk and docketing clerk to temporarily restrict access to additional pleadings.	0.2	
10/25/2023	BBK	Emailing w/ co-counsel re: planned response to J. Bertino; drafting/sending same.	0.2	
10/25/2023	BBK	Drafting updated motion to remove incorrectly filed docs and amended admin motion re sealing ILO of Ds' further requests (and supporting pleadings).	1.1	
10/25/2023	BBK	Emailing w/ JSY and KES re revising/finalizing above pleadings and plan for filing same.	0.4	
10/25/2023	BBK	Reviewing emails between M. Johnson and opposing counsel negotiating stipulation re briefing schedule for all pending motions.	0.2	
10/25/2023	AX	Review team emails re stipulation and sealing issues.	0.3	
10/25/2023	AX	Review motion for sanctions and Rutter guide for sanctions.	0.3	
10/25/2023	AX	Meeting with BBK, KES re sealing issues; meeting with GCG and JSY re opp to motion for sanctions.	0.8	
10/25/2023	AX	Emails with BBK and team re removing improperly sealed documents.	0.3	
10/25/2023	AX	Legal research re opposition to motion for sanctions.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/25/2023	KES	Review emails re sealing issues, compare previously filed versions of Wallace exhibits with redacted versions filed at ECF 650; prepare modified redacted set; confer team re same.	3.5	
10/26/2023	GCG	Conference with BBK re sealing motions and opposition to administrative motion.	0.2	
10/26/2023	GCG	Review and revise opposition to motion to shorten time.	0.5	
10/26/2023	GCG	Emails MJ-BU re same.	0.1	
10/26/2023	JSY	Emails re Opp to motion for expedited briefing.	0.1	
10/26/2023	BBK	Conferring w/ JSY and AX re reviewing/commenting on M. Johnson draft Opp to Admin Motion to Shorten Time to brief and hear Motion to Strike.	0.1	
10/26/2023	BBK	Reviewing/commenting on M. Johnson draft Opp to Admin Motion to Shorten Time to brief and hear Motion to Strike and supporting attorney dec.	0.7	
10/26/2023	BBK	Conferring w/ GCG re commenting on Opp to Admin Motion to Shorten Time.	0.1	
10/26/2023	BBK	Emails w/ KES re finalizing/filing motion to remove incorrectly filed docs, amended admin motion re sealing ds' materials, and supporting pleadings.	0.3	
10/26/2023	BBK	Phone call w/ KES re finalizing/filing motion to remove incorrectly filed docs, amended admin motion re sealing ds' materials, and supporting pleadings.	0.5	
10/26/2023	BBK	Emailing w/ KES re filing corrected redacted public versions of docs removed from docket and filed under seal.	0.2	
10/26/2023	BBK	Reviewing emails w/ opposing counsel re: whether to stipulate to change briefing schedule on pending motions.	0.1	
10/26/2023	BBK	Reviewing court order granting stip re omnibus sealing motion; conferring w/ KES re same.	0.1	
10/26/2023	BBK	Meeting w/ KES re oppositions to Ds' motion to strike and motion for sanctions.	0.2	
10/26/2023	AX	Research and drafting opp to motion for sanctions.	3.5	
10/26/2023	KES	Confer BBK re amended administrative motion to seal, motion to remove documents and redacted versions of documents per opposing counsel request.	0.5	
10/26/2023	KES	Review, finalize and efile motion to remove improperly filed documents; email proposed order re same; download and organize filed docs re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/26/2023	KES	Review, finalize and efile amended administrative motion to determine whether to seal defs material; email proposed order re same; download and organize filed documents re same.	1.3	
10/26/2023	KES	Prepare and efile re-redacted versions of documents per amended admin motion to seal; confer team re final docs; download and organize filed docs.	1.8	
10/27/2023	GCG	Review court order re removal of sealed document from docket.	0.1	
10/27/2023	GCG	Initial review of AX outline of opposition to sanctions.	0.1	
10/27/2023	GCG	Conference with AX and JSY re same.	0.2	
10/27/2023	JSY	Review and edit outline of Opp to Mtn for Sanctions; conf. w/ GCG and AX re same.	0.5	
10/27/2023	BBK	Reviewing Order granting motion to remove incorrectly filed docs; reviewing ECF Notice re Ds' filing of Answer to 4th Amended Complaint.	0.1	
10/27/2023	BBK	Reviewing M. Johnson emails w/ opposing counsel re stipulation to request additional pages for Ds' Opp to Motion for Leave and Pls' Reply ISO same.	0.1	
10/27/2023	BBK	Reviewing AX outline of Opposition to Motion for Sanctions.	0.1	
10/27/2023	AX	Legal research and draft outline for opposition to motion for sanctions.	3.0	
10/27/2023	AX	Call with JSY and GCG re opposition to motion for sanctions.	0.1	
10/27/2023	AX	Revise outline and additional research.	0.4	
10/27/2023	KES	Review and compare order with proposed, download and circulate court order.	0.3	
10/27/2023	KES	Download and circulate Answer to Fourth Amended Complaint.	0.1	
10/27/2023	KES	Download and circulate Opp to Admin Motion.	0.1	
10/27/2023	KES	Download and circulate Stip and Order.	0.1	
10/28/2023	GCG	Review GW outline of opposition to motion to strike.	0.1	
10/28/2023	GCG	Email GW-team re same.	0.1	
10/30/2023	BBK	Reviewing G. Wallace outline for opposition to motion to strike.	0.1	
10/30/2023	BBK	Reviewing M. Johnson - E. Rutner emails re dispute over scope of joint discovery letter brief.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2023	BBK	Reviewing Court Orders on Admin Motions to shorten briefing schedule and for extra pages; reviewing M. Johnson report to co-counsel re Ds' Objections to Demand for Site Inspections.	0.1	
10/30/2023	AX	Draft opposition to motion for sanctions.	1.3	
10/30/2023	KES	Download and circulate orders.	0.1	
10/31/2023	GCG	Confs w/ JSY and BBK re status and upcoming briefs opposing motions to strike and for sanctions.	0.2	
10/31/2023	JSY	Conf. w/ GCG re motion for sanctions and motion to strike.	0.2	
10/31/2023	BBK	Reviewing M. Johnson emails w/ opposing counsel re: dispute over joint letter brief process and production of materials relied upon by Pls' experts.	0.1	
10/31/2023	BBK	Reviewing/responding to G. Wallace email re: legal research for Opposition to Motion to strike; conferring w/ GCG re same.	0.2	
10/31/2023	AX	Research and drafting opposition to sanctions motion.	6.5	
11/1/2023	GCG	Review information re 10th CIR sanctions decisions for potential use in motion.	0.1	
11/1/2023	GCG	Email MWB-JSY-team re same.	0.1	
11/1/2023	GCG	Conference with BBK re status of inspections and MSJ.	0.1	
11/1/2023	JSY	Emails re motion for sanctions.	0.1	
11/1/2023	BBK	Conferring w/ GCG re resolving discovery dispute re: inspections of named Pls' BD facilities.	0.1	
11/1/2023	AX	Legal research re opposition to motion for sanctions; draft and revise brief.	7.0	
11/2/2023	GCG	Emails GW-team re draft opposition briefs.	0.2	
11/2/2023	JSY	Emails re Opp to motion for sanctions.	0.1	
11/2/2023	JSY	Edit Opp re sanctions motion; emails and messages re same.	0.9	
11/2/2023	BBK	Revising/commenting on AX draft Opposition to Motion for Sanctions.	1.0	
11/2/2023	BBK	Conferring w/ AX and JSY re revisions to Opposition to Motion for Sanctions.	0.3	
11/2/2023	BBK	Conferring w/ AX/JSY/GCG re revising/commenting on co-counsel's draft Opposition to Motion to Strike.	0.1	
11/2/2023	BBK	Conferring w/ AX/JSY/GCG and G. Wallace re co-counsel meeting on 11/3.	0.1	
11/2/2023	AX	Correspondence with team re revisions to Opp to Motion for Sanctions, Opposition to Motion to Strike.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/2/2023	AX	Begin review of opposition to motion to strike.	0.5	
11/3/2023	GCG	Conferences with JSY and AX re sanctions brief.	0.2	
11/3/2023	GCG	Review and revise opposition to sanctions.	0.9	
11/3/2023	GCG	Meet with co-counsel team to discuss 2 oppositions due and inspection planning.	0.6	
11/3/2023	JSY	Conf. w/ GCG re Opp to Sanctions motion.	0.1	
11/3/2023	JSY	Team meetings re motion for sanctions and motion to strike oppositions.	0.8	
11/3/2023	JSY	Emails re search for emails.	0.1	
11/3/2023	JSY	Emails re 30b6 depositions.	0.1	
11/3/2023	JSY	Emails re sanctions opp.	0.1	
11/3/2023	BBK	Revising/commenting on draft Opposition to Motion to Strike.	1.3	
11/3/2023	BBK	Emailing w/ RBGG team re draft Opposition to Motion to Strike.	0.1	
11/3/2023	BBK	Meeting w/ co-counsel re preparing Oppositions to Motion to Strike and to Motion for Sanctions.	0.8	
11/3/2023	BBK	Reviewing M. Johnson - E. Rutner emails re joint discovery letter brief re: production of staffing formula.	0.1	
11/3/2023	BBK	Conferring w/ M. Johnson re meet and confer email to Ds re re-inspections of Pls' facilities; reviewing/commenting on draft email re same.	0.2	
11/3/2023	BBK	Reviewing AX revised Opp to Motion for Sanctions w/ GCG comments on same.	0.2	
11/3/2023	AX	Call with team re case tasks, motion to strike and sanctions motion oppositions, facility inspections, trial prep.	0.7	
11/3/2023	AX	Revise Opposition to Motion for Sanctions.	2.0	
11/3/2023	AX	Review Opposition to Motion to Strike and draft revisions and comments.	1.7	
11/5/2023	GCG	Review and revise draft opposition to sanctions.	0.8	
11/5/2023	GCG	Conference with AX and emails GW-MJ re same and re opposition to motion to strike.	0.4	
11/5/2023	GCG	Review and prepare revisions to opposition to motion to strike.	0.8	
11/5/2023	AX	Revise Opposition to Motion for Sanctions and cite check cases, citations to record.	2.2	
11/6/2023	GCG	Revise opposition to motion for sanctions.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 749

SERVICES

Date	Person	Description of Services	Hours	Discount
11/6/2023	GCG	Conf w/ JSY and email AX re revisions to same.	0.2	
11/6/2023	GCG	Meet w. co-counsel to prepare for filing 2 opposition briefs and to discuss potential sealing.	0.3	
11/6/2023	JSY	Emails re orientation meeting re case for AS.	0.1	
11/6/2023	JSY	Team check in re two oppositions.	0.2	
11/6/2023	JSY	Conf. w/ AX and GCG re Opp to motion for sanctions.	0.1	
11/6/2023	JSY	Review and edit briefs; emails re same.	0.5	
11/6/2023	JSY	Emails re filing Opps.	0.1	
11/6/2023	BBK	Emailing w/ B. Umpierre and J. Bybee re under seal/redacted status of expert declarations for Opp to Motion to Strike.	0.3	
11/6/2023	BBK	Reviewing GCG comments on revised draft Opp to Motion to Strike.	0.1	
11/6/2023	BBK	Meeting w/ co-counsel re finalizing/filing Opp to Motion to Strike and Opp to Sanctions Motion.	0.2	
11/6/2023	BBK	Emailing w/ RBGG team and co-counsel re finalizing/filing Opps to Motion to Strike and Motion for Sanctions.	0.2	
11/6/2023	BBK	Reviewing M. Johnson - opposing counsel emails re expert productions and inspections of Ds' facilities where named Plaintiffs reside.	0.1	
11/6/2023	AX	Revise opposition to motion for sanctions.	0.5	
11/6/2023	AX	Final close read of opposition to motion for sanctions.	1.3	
11/6/2023	AX	Emails re filing.	0.3	
11/6/2023	AX	Meeting with team re filings.	0.2	
11/6/2023	AX	Finalize opposition and emails to KES re filing.	0.5	
11/7/2023	BBK	Revising draft motion for PSJ section on Ds' affirmative duty to remediate architectural barriers under ADA and CA law.	0.5	
11/8/2023	GCG	Conf w/ BBK re plan for reply pleadings.	0.1	
11/8/2023	JSY	Emails with AS re case orientation and 4AC.	0.1	
11/8/2023	BBK	Reviewing M. Johnson emails w/ opposing counsel re expert productions.	0.1	
11/8/2023	BBK	Phone call w/ GCG re Reply ISO Motion for Leave to Move for Certification of Subclasses.	0.1	
11/9/2023	JSY	(Billing Judgment) Meet with AS re overview of case.	0.0	0.8
11/9/2023	JSY	(Billing Judgment) Emails re key documents in case.	0.0	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 750

SERVICES

Date	Person	Description of Services	Hours	Discount
11/9/2023	JSY	Emails re Opp re motion for leave; review same.	0.2	
11/9/2023	AHS	Read operative complaint.	0.8	
11/9/2023	AHS	(Billing Judgment) Met with JY to get overview of case.	0.0	0.8
11/9/2023	KES	Download and circulate Defs opposition.	0.2	
11/10/2023	GCG	Conf w/ JSY and email to GW re defendants' opposition to motion for leave.	0.2	
11/10/2023	JSY	Review Opp to Motion for Leave for Certification of Subclasses.	0.5	
11/10/2023	JSY	Team meeting re Opp to Motion for Leave.	0.8	
11/10/2023	JSY	Conf. w/ GCG re Reply ISO motion for leave; research re same.	0.2	
11/10/2023	JSY	Conf. w/ AS re Rule 16 research.	0.2	
11/10/2023	JSY	Emails re follow up from meeting.	0.4	
11/10/2023	AHS	Reviewed trial ct order granting in part and denying in part motion for class cert.	1.2	
11/10/2023	AHS	Meeting with co-counsel to disucss defs' motion in opp to our mot for leave to move to certify subclasses.	0.8	
11/10/2023	AHS	Reviewed and cleaned up notes from co-counsel meeting; circulated to JY.	1.2	
11/10/2023	AHS	Conf. w/ JY re Rule 16 issue for our reply to def's motion in opp to our mot to certify subclasses.	0.3	
11/10/2023	AHS	Cleaned up notes and next steps for our reply in response to JY and circulated to RBGG team.	0.2	
11/11/2023	GCG	Email to GW, MJ and JSY re WAPO investigation.	0.1	
11/12/2023	GCG	Review emails from ER re request for extension and proposed responses.	0.1	
11/13/2023	GCG	Review and revise administrative motion for additional time for reply.	0.3	
11/13/2023	GCG	Emails to GW, MJ and team re same.	0.2	
11/13/2023	GCG	Email to AS re research for reply.	0.1	
11/13/2023	GCG	Email w/ Washington Post reporter re Brookdale understaffing.	0.2	
11/13/2023	JSY	Multiple emails and conf. re admin motion re extension.	0.3	
11/13/2023	BBK	Reviewing M. Johnson - E. Rutner emails re: Pls' requested EOT to file Reply ISO Motion for Leave.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 751

SERVICES

Date	Person	Description of Services	Hours	Discount
11/13/2023	BBK	Conferring w/ GCG and JSY re comments/revisions to draft Admin Motion for EOT to File Reply.	0.3	
11/13/2023	BBK	Reviewing AS notes from 11/10 co-counsel meeting re: Reply ISO Motion for Leave.	0.1	
11/13/2023	BBK	Reviewing/analyzing Ds' Opp to Motion for Leave and supporting declarations.	1.0	
11/13/2023	KES	Download and circulate pleadings.	0.1	
11/14/2023	GCG	Review and analyze defendants' opposition to motion to leave.	0.7	
11/14/2023	GCG	Confs w/ GW, BBK and JSY re reply to same.	0.3	
11/14/2023	GCG	Email to AS re legal research for reply.	0.1	
11/14/2023	GCG	Email to BBK, MJ and ER re inspections.	0.1	
11/14/2023	JSY	Emails with family of resident.	0.1	
11/14/2023	JSY	Emails re Reply tasks.	0.1	
11/14/2023	JSY	Conf. w/ GCG re reply timeline.	0.1	
11/14/2023	BBK	Reviewing Ds' Reply ISO Motion to Strike and Reply ISO Motion for Sanctions.	0.7	
11/14/2023	BBK	Emailing w/ JSY and AS re meeting on legal research projects for Reply ISO Motion for Leave.	0.1	
11/14/2023	BBK	Phone call w/ GCG re Reply ISO Motion for Leave.	0.1	
11/14/2023	BBK	Reviewing E. Rutner M&C email re: inspections of BD facilities.	0.1	
11/14/2023	BBK	Drafting proposed response to E. Rutner M&C email re: inspections of BD facilities and email to co-counsel re same.	0.6	
11/14/2023	AHS	Researched Rule 16 case management orders for our reply to defs' opp to our mot for leave to move to certify subclasses.	2.5	
11/15/2023	GCG	Conf w/ GW re approach to reply.	0.1	
11/15/2023	GCG	Emails to BBK and AS and conf w/ JSY and KES re same.	0.1	
11/15/2023	GCG	Review BBK declaration for elopement issues.	0.1	
11/15/2023	JSY	Conf. w/ GCG re Reply assignments; emails re same; review AS memo re same.	0.2	
11/15/2023	BBK	Reviewing/responding to M. Johnson revisions to BBK draft response to E. Rutner re inspections.	0.2	
11/15/2023	BBK	Analyzing G. Wallace outline for Reply ISO Motion for Leave for RBGG team.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 752

SERVICES

Date	Person	Description of Services	Hours	Discount
11/15/2023	BBK	Emailing w/ RBGG team re drafting assignments for RBGG for Reply ISO Motion for Leave.	0.1	
11/15/2023	BBK	Conferring w/ RBGG team re materials re: BD's understaffing.	0.2	
11/15/2023	BBK	Emailing w/ RBGG team re G. Wallace's updated outline for Reply ISO Motion for Leave.	0.1	
11/15/2023	BBK	Reviewing AHS legal research memo re: addressing Ds' allegation that Pls violation FRCP 16 scheduling order in Reply ISO Motion for Leave.	0.2	
11/15/2023	BBK	Emailing w/ JSY and AHS re drafting insert re: FRCP 16 scheduling order issue for Reply ISO Motion for Leave.	0.2	
11/15/2023	BBK	Researching and drafting insert for Reply ISO Motion for Leave re certification of Elder Financial Abuse statute subclass.	4.3	
11/15/2023	AHS	Continued research on Rule 16 issue.	5.4	
11/16/2023	GCG	Prepare for and conduct co-counsel meeting re reply pleadings.	0.6	
11/16/2023	GCG	Conf w/ JSY and emails to RBGG team re legal research and declaration for reply.	0.2	
11/16/2023	JSY	Review and edit Reply section re elder abuse statute.	0.2	
11/16/2023	JSY	Multiple emails and conf. re insertions for Reply re injunctive relief.	0.5	
11/16/2023	JSY	Team meeting re Reply.	0.6	
11/16/2023	JSY	Draft GCG Decl and edit same and other docs re Reply; emails and conf. re same.	0.6	
11/16/2023	BBK	Revising draft insert for Reply ISO Motion for Leave re Elder Financial Abuse subclass; emailing w/ RBGG team w/ same.	0.3	
11/16/2023	BBK	Reviewing JSY comments on insert re Elder Financial Abuse subclass and revising accordingly.	0.2	
11/16/2023	BBK	Conferring w/ JSY re drafting insert for Reply ISO Motion for Leave re alleged violations of scheduling order.	0.1	
11/16/2023	BBK	Meeting w/ JSY and AHS re legal research and draft inserts for Reply ISO Motion for Leave.	0.3	
11/16/2023	BBK	Meeting w/ co-counsel re Reply ISO Motion for Leave.	0.6	
11/16/2023	BBK	Emailing w/ RBGG team re drafting insert for Reply ISO Motion for Leave re scrivener's error.	0.1	
11/16/2023	BBK	Drafting insert for Reply re alleged violation of scheduling order.	1.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 753

SERVICES

Date	Person	Description of Services	Hours	Discount
11/16/2023	BBK	Reviewing/commenting on JSY draft declaration of GCG for Reply ISO Motion for Leave.	0.2	
11/16/2023	BBK	Reviewing E Rutner email re inspections of BD facilities; conferring w/ M. Johnson re responding to same.	0.1	
11/16/2023	BBK	Reviewing JSY and AHS comments on draft insert for Reply re alleged violation of scheduling order and revising accordingly.	0.2	
11/16/2023	BBK	Emailing w/ G. Wallace re BBK draft inserts for Reply.	0.1	
11/16/2023	BBK	Analyzing G. Wallace revised outline of Reply Brief.	0.5	
11/16/2023	BBK	Revising/commenting on AHS draft insert for Reply re scrivener's error (including legal research for same).	1.8	
11/16/2023	AHS	Meeting with JY and BBK to discuss Rule 16 and scrivener's error research for our reply re mot for leave to move for subclass cert.	0.4	
11/16/2023	AHS	Meeting with co-counsel to discuss strategy for our reply brief.	0.6	
11/16/2023	AHS	Researched scrivener's error and drafted section of reply ISO mot for leave re subclasses.	2.2	
11/16/2023	KES	Team Zoom re reply.	0.5	
11/17/2023	GCG	Conf re: Brookdale's inadequate staffing.	0.4	
11/17/2023	GCG	Research and draft summary of March 30 order for same.	0.8	
11/17/2023	GCG	Review and analyze JA declaration for use in reply.	0.2	
11/17/2023	GCG	Research and revise section of reply brief.	0.7	
11/17/2023	GCG	Review and revise Grunfeld reply declaration.	0.4	
11/17/2023	GCG	Confs w/ JSY and AS and emails to GW and team re same and re reply pleadings.	0.3	
11/17/2023	JSY	Three calls with GCG re Brookdale Reply.	0.3	
11/17/2023	JSY	Prepare sealing pleadings re Reply.	0.3	
11/17/2023	JSY	Review and edit sections of Reply; multiple emails re same.	1.2	
11/17/2023	BBK	Emailing w/ M. Johnson re draft response to E. Rutner re inspections.	0.1	
11/17/2023	BBK	Emailing w/ RBGG team re sealing pleadings for Reply ISO Motion for Leave.	0.1	
11/17/2023	BBK	Emailing w/ JSY and AHS re revisions to insert for Reply re scrivener's error; reviewing JSY/AHS revisions IRT same.	0.3	
11/17/2023	BBK	Emailing w/ JSY and G. Wallace re reviewing/commenting on ADA Section of Reply.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/17/2023	BBK	Reviewing/commenting on ADA Section of Reply.	1.0	
11/17/2023	BBK	Reviewing Ds' Opp to Admin Motion for EOT to File Reply.	0.2	
11/17/2023	BBK	Reviewing JSY additional comments on ADA Section of Reply.	0.2	
11/17/2023	AHS	Worked on reply section on Scrivener's errors.	4.2	
11/17/2023	KES	Download and circulate pleadings.	0.2	
11/17/2023	KES	Update cites in Grunfeld reply declaration.	0.4	
11/19/2023	GCG	Research and revise draft reply brief ISO motion for lease.	1.2	
11/19/2023	GCG	Review and respond to GW updates on reply pleadings.	0.1	
11/19/2023	GCG	Review MJ correspondence re inspection objections.	0.1	
11/20/2023	GCG	Review and further revise reply brief ISO motion for leave.	0.5	
11/20/2023	GCG	Review and finalize Grunfeld and Wallace reply declarations.	0.7	
11/20/2023	GCG	Draft motion to seal one sentence of Jones declaration.	0.5	
11/20/2023	GCG	Review and revise Umpierre reply declaration.	0.4	
11/20/2023	GCG	Confs w/ GW, MJ, BU, KES and emails to team re revising and filing reply pleadings.	0.6	
11/20/2023	GCG	Review and analyze defendants' reply ISO motion to strike.	0.2	
11/20/2023	GCG	Review and analyze defendants' reply ISO motion for sanctions.	0.2	
11/20/2023	GCG	Review and circulate NYT expose of assisted living model.	0.1	
11/20/2023	GCG	Oversee filing and reply pleadings.	0.2	
11/20/2023	GCG	Emails to MB and MJ re discovery issues.	0.1	
11/20/2023	JSY	Review reply; emails re same.	0.2	
11/20/2023	KES	Review and prepare reply exhibits, finalize expert declaration, and final review of all reply papers, serve under seal docs; file admin motion to seal and reply re motion for leave to file motion to certify subclasses.	1.8	
11/20/2023	DLE	Pull and save articles for fact research; circulate same.	0.3	
11/21/2023	GCG	Review emails to ER and MJ re inspection dispute.	0.1	
11/21/2023	GCG	Email to MJ and team re factual research into Brookdale rent increases.	0.1	
11/21/2023	AHS	Read NYT article"Extra Fees Drive Assisted-Living Profits".	0.4	
11/21/2023	KES	Download and organize reply papers.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 755

SERVICES

Date	Person	Description of Services	Hours	Discount
11/22/2023	GCG	Emails MJ-Defs re discovery letter to MJ Beales.	0.1	
11/22/2023	KES	Review and save court order.	0.1	
11/27/2023	GCG	Meet with RBGG team to plan discovery and trial preparation.	0.4	
11/27/2023	GCG	Email BBK-MJ re discovery cut-off rules and plan.	0.1	
11/27/2023	JSY	Conf. w/ GCG re status.	0.1	
11/27/2023	JSY	Emails re team meeting.	0.1	
11/27/2023	JSY	Meeting re case tasks and status.	0.4	
11/27/2023	JSY	Emails re team meeting.	0.1	
11/27/2023	BBK	Reviewing Reply ISO Motion for Leave and supporting declarations.	0.7	
11/27/2023	BBK	Reviewing emails w/ opposing counsel re production of outstanding docs IRT Pls' RFPs.	0.1	
11/27/2023	BBK	Reviewing emails w/ opposing counsel re inspections of BD facilities.	0.1	
11/27/2023	BBK	(Billing Judgment) Reviewing NYTimes article re assisted living price increases and growing revenues.	0.0	0.1
11/27/2023	BBK	Meeting w/ RBGG team re case tasks and priorities.	0.4	
11/27/2023	BBK	Researching deadline to file discovery motions as related to discovery cut-off in ND Cal Local Rules and Judge Gilliam's standing order; reporting on same.	0.5	
11/27/2023	BBK	Emailing w/ co-counsel re 12/1 team meeting and trial prep.	0.1	
11/27/2023	BBK	Emailing w/ AX re draft letter to clients re hearing on motion for leave and w/ KES re updated case task list.	0.1	
11/27/2023	AHS	Internal team call re: tasks, upcoming deadlines, MSJ.	0.4	
11/27/2023	AX	Meeting with team re case tasks.	0.3	
11/27/2023	AX	Draft plaintiff update letter.	0.5	
11/27/2023	AX	Review Reply and other filings.	0.5	
11/27/2023	KES	Create draft case task list; review pre-trial deadlines and prior tasks lists re same.	0.5	
11/27/2023	KES	Team Zoom re case deadlines and tasks.	0.5	
11/27/2023	DLE	Attend team meeting re case tasks.	0.4	
11/28/2023	GCG	Conference with AX re letter to Plaintiffs.	0.1	
11/28/2023	GCG	Research and draft email to witnesses.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/28/2023	GCG	Email from MJ re hearing plan.	0.1	
11/28/2023	JSY	Emails re team meeting.	0.1	
11/28/2023	JSY	Emails re letter to class reps.	0.1	
11/28/2023	BBK	Preparing pre-trial plan and case task list.	1.6	
11/28/2023	AX	Call with GCG and email to cocounsel re update letter to plaintiffs.	0.2	
11/28/2023	AX	Revise update letter and send to cocounsel.	0.3	
11/28/2023	KES	Review updated case deadline and task list.	0.2	
11/29/2023	JSY	Emails re discovery and case schedule.	0.2	
11/29/2023	BBK	Reviewing/responding to JSY query re outstanding discovery disputes and drafting recs for next steps re same.	0.4	
11/29/2023	BBK	Analyzing potential legal research assignments for motion for partial summary judgment.	0.3	
11/29/2023	AX	Review, finalize, and send update letters to plaintiffs.	1.0	
11/29/2023	AX	Review team correspondence re case tasks, including discovery cut off, possible motions to compel, and other preparation for trial.	0.2	
11/30/2023	JSY	Emails re contact from resident.	0.1	
11/30/2023	BBK	Preparing legal research assignment for AHS re law of case doctrine for motion for partial summary judgment.	0.3	
11/30/2023	BBK	Emailing w/ AHS re legal research assignment.	0.2	
11/30/2023	BBK	Reviewing AX-P Lindstrom emails re hearing on motion for leave.	0.1	
11/30/2023	BBK	Reviewing M. Johnson email to RBGG team re attempts to schedule inspections and potential alternatives.	0.1	
11/30/2023	AHS	Reviewed research assignment re: law of the case for motion for partial SJ from BBK.	0.5	
11/30/2023	AX	Emails with named plaintiffs re update letters.	0.1	
12/1/2023	GCG	Meet w/ BU and Schneider Wallace to plan discovery and trial.	1.2	
12/1/2023	GCG	Meet w/ RBGG team re same and re motion for summary judgment.	0.4	
12/1/2023	GCG	Review team notes re action items for the next week.	0.2	
12/1/2023	GCG	Conf w/ JSY re same.	0.1	
12/1/2023	JSY	Team meeting with co-counsel.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/1/2023	JSY	RBGG team meeting.	0.4	
12/1/2023	BBK	Preparing for co-counsel meeting re trial prep.	0.2	
12/1/2023	BBK	Co-counsel meeting re trial prep.	1.2	
12/1/2023	BBK	Reviewing/revising AHS notes from co-counsel call; sending same to co-counsel.	0.4	
12/1/2023	BBK	Conferring w/ G. Wallace by email and phone re joint discovery letter brief re transportation class list.	0.2	
12/1/2023	BBK	Meeting w/ RBGG team re immediate case tasks.	0.5	
12/1/2023	BBK	Emailing w/ G. Wallace, R. Steyer, and RBGG team re motions to compel class lists.	0.1	
12/1/2023	BBK	Reviewing changes to amended reply ISO motion for leave; R. Steyer email re analyzing contents of disc production; AX updated task list.	0.1	
12/1/2023	BBK	Reviewing M. Johnson meet and confer emails to Ds re inspections of BD facilities and confirming impasses on disc disputes.	0.1	
12/1/2023	AHS	Call with co-counsel.	1.2	
12/1/2023	AHS	Organized notes from co-counsel call and circulated them internally.	0.4	
12/1/2023	AHS	Internal call with Brookdale team to divvy up tasks and next steps.	0.5	
12/1/2023	AHS	Researched law of the case issue for partial MSJ.	2.1	
12/1/2023	AX	Meeting with cocounsel and team re discovery plan and ongoing projects.	1.5	
12/1/2023	DLE	Attend and note-take monthly co-counsel meeting to discuss case tasks.	1.2	
12/1/2023	DLE	Attend and note-take debrief of monthly co-counsel call.	0.4	
12/2/2023	GCG	Emails to key witnesses re hearing on motion for subclasses.	0.1	
12/4/2023	JSY	Emails with witness.	0.1	
12/4/2023	JSY	Review motion to strike and sanctions motion.	0.2	
12/4/2023	BBK	Reviewing emails w/ co-counsel re contention interrogatories and emails w/ opposing counsel re: confirming impasse of disc disputes, setting inspections, and stipulating to expert disclosure deadlines.	0.1	
12/4/2023	BBK	Reviewing/responding to M. Johnson email re disc dispute over production of transportation class list and joint letter brief re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2023	BBK	Emails w/ AX and KES re transcript of 8/24 CMC where Judge Gilliam ruled on motion re class notice.	0.1	
12/4/2023	BBK	Emails w/ co-counsel re responding to outreach from putative CM.	0.1	
12/4/2023	BBK	Reviewing/commenting on AHS draft inserts for motion for PSJ re law of case doctrine.	0.2	
12/4/2023	BBK	Emails and phone call w/ G. Wallace re joint letter brief on class list.	0.1	
12/4/2023	BBK	Reviewing/commenting on M. Johnson draft revisions to joint letter brief re production of staffing formula IRT Ds' section of same.	0.2	
12/4/2023	BBK	Researching/drafting joint letter brief re production of transportation class list.	3.6	
12/4/2023	AHS	Reviewed upcoming deadlines.	0.2	
12/4/2023	AHS	Researched law of the case for portion of motion for partial summary judgment.	3.5	
12/4/2023	KES	Organize case hearing transcripts.	0.2	
12/4/2023	KES	Download and circulate pleadings.	0.1	
12/5/2023	GCG	Confs w/ JSY and emails to team re defendants' motion to strike and plaintiffs' interrogatories.	0.4	
12/5/2023	GCG	Revise discovery brief re class list.	0.1	
12/5/2023	JSY	Conf. w/ GCG re sanctions motion and discovery.	0.1	
12/5/2023	JSY	Emails re responses to motions.	0.1	
12/5/2023	JSY	Conf. w/ AX re ROGS and sanctions motion.	0.3	
12/5/2023	JSY	Conf. w/ GCG re ROGS and sanctions motion.	0.2	
12/5/2023	JSY	Conf. w/ AS re witness list.	0.2	
12/5/2023	JSY	Conf. w/ AS re sanctions opp.	0.1	
12/5/2023	JSY	Emails re sanctions opp and opp to MTS.	0.1	
12/5/2023	JSY	Emails re joint letter brief.	0.1	
12/5/2023	JSY	Review and edit ROGs; emails re same.	0.3	
12/5/2023	BBK	Emailing w/ co-counsel and RBGG team re preparing contention interrogatories.	0.2	
12/5/2023	BBK	Drafting joint discovery letter brief re transportation class list.	2.2	
12/5/2023	BBK	Emailing w/ AHS re revisions to insert for PSJ Motion re law of case.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 759

SERVICES

Date	Person	Description of Services	Hours	Discount
12/5/2023	BBK	Reviewing Ds' motion to strike and motion for sanctions.	0.3	
12/5/2023	BBK	Emailing w/ GCG/JSY re draft joint discovery letter brief; finalizing/sending same to co-counsel.	0.2	
12/5/2023	AHS	Drafted initial Witness List.	2.1	
12/5/2023	AHS	Read defs' mot for sanctions and mot to strike.	0.3	
12/5/2023	AHS	Conf w JY re: case tasks.	0.2	
12/5/2023	AX	Review secondary materials re contention interrogatories.	0.6	
12/5/2023	AX	Review prior discovery.	0.5	
12/5/2023	AX	Draft contention interrogatories.	2.5	
12/5/2023	AX	Emails with team re discovery.	0.3	
12/5/2023	AX	Call with JSY re ongoing projects.	0.2	
12/5/2023	KES	Calendar motion deadlines.	0.3	
12/6/2023	GCG	Conf w/ JSY re approach to discovery closure and sanctions motion.	0.1	
12/6/2023	GCG	Emails to GW, MJ, AX and team re interrogatories and discovery dispute re class list.	0.2	
12/6/2023	GCG	Conf w/ BBK re motion for summary judgment.	0.1	
12/6/2023	JSY	Conf. w/ GCG re status of projects.	0.1	
12/6/2023	JSY	Emails re Opps to MTS and Mtn for Sanctions.	0.1	
12/6/2023	JSY	Emails re letter brief.	0.1	
12/6/2023	JSY	Emails re ROGS.	0.1	
12/6/2023	JSY	Review ROGs and cover letter; emails re same.	0.2	
12/6/2023	JSY	Emails re sanctions motion, ROGs, depositions.	0.2	
12/6/2023	BBK	Emails w/ co-counsel and RBGG team re finalizing/sending joint discovery letter brief re class list to Ds.	0.3	
12/6/2023	BBK	Drafting/sending email to E. Rutner w/ joint discovery letter brief re class list and requesting Ds' section of same.	0.2	
12/6/2023	BBK	Emails w/ co-counsel and RBGG team re revising/adding to contention ROGs and cover letter to Ds re exceeding 25 ROG limit.	0.3	
12/6/2023	BBK	Reviewing email from E. Rutner re stipulating to lack of modifications/alterations to common areas and named Pls' rooms in BD facilities in lieu of re-inspections.	0.1	
12/6/2023	BBK	Phone call w/ GCG re Brookdale projects.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 760

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2023	BBK	Conferring w/ KES re opposing BD's motion to strike and for sanctions & discovery.	0.2	
12/6/2023	BBK	Emails w/ co-counsel re requesting substantive answer to B. Jestrabek-Hart ROG; reviewing J. Bertino update re Ds' supplemental doc prod.	0.1	
12/6/2023	AHS	Review emails re discovery.	0.3	
12/6/2023	AX	Revise interrogatories and emails re same.	1.8	
12/6/2023	AX	Draft cover letter to interrogatories and emails re same; review of FRCP.	1.0	
12/7/2023	GCG	Conf w/ AX and emails to MJ and team re interrogatories.	0.1	
12/7/2023	JSY	Conf. w/ AX re discovery.	0.1	
12/7/2023	JSY	Conf. w/ AS re sanctions opp.	0.4	
12/7/2023	BBK	Emails w/ co-counsel re status of identifying needed deponents and serving deposition notices.	0.1	
12/7/2023	BBK	Emails re R. Steyer draft RFPs seeking resident files for and communications w/ happy camper declarants.	0.1	
12/7/2023	BBK	Reviewing/commenting on M. Johnson draft revised joint letter brief re staffing formula; reviewing E. Rutner and M. Johnson emails re Ds' demand to re-depose Pls' expert prior to filing letter brief.	0.2	
12/7/2023	BBK	Emails w/ co-counsel and RBGG team re finalizing/serving contention rogs.	0.1	
12/7/2023	AHS	Met with JY to discuss defs' mot for sanctions and strategize our opposition.	0.4	
12/7/2023	AHS	Reviewed def's motion for sanctions.	0.2	
12/7/2023	AX	Revise eight sets of interrogatories and emails re same.	4.5	
12/7/2023	AX	Further revisions to eight sets of interrogatories, including calls and emails with MJ and KES; work with KES to finalize and serve interrogatories.	1.5	
12/7/2023	KES	Review, finalize and serve eight Plaintiffs' interrogatories to Defendants; confer AX re same.	2.7	
12/8/2023	GCG	Participate in trial and discovery meeting w/ co-counsel team.	1.1	
12/8/2023	GCG	Follow up conference w/ RBGG team re same.	0.2	
12/8/2023	JSY	Emails re discovery requests and due dates for responses.	0.1	
12/8/2023	JSY	Team meeting.	1.0	
12/8/2023	JSY	RBGG team meeting.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/8/2023	JSY	Emails re depositions.	0.2	
12/8/2023	JSY	Emails re motion to strike amended BU decl.	0.1	
12/8/2023	BBK	Conferring w/ JSY/KES re deadlines for Ds' to respond to discovery served on 12/7.	0.1	
12/8/2023	BBK	Emails w/ co-counsel re status of discovery and oppositions to motion to strike and for sanctions.	0.1	
12/8/2023	BBK	Reviewing/commenting on M. Johnson draft email to Ds re additional depositions.	0.2	
12/8/2023	BBK	Meeting w/ co-counsel re immediate case tasks and priorities.	1.0	
12/8/2023	BBK	RBGG team debrief re meeting w/ co-counsel re immediate case tasks and priorities.	0.3	
12/8/2023	BBK	Emails w/ co-counsel re drafting joint letter brief for ESI re implementation of Fleet Safety Policy.	0.1	
12/8/2023	BBK	Reviewing notice of Motion to Strike Amended Umpierre Declaration ISO Reply for Motion for Leave; conferring w/ team re same.	0.1	
12/8/2023	BBK	Reviewing meet and confer emails re Pls' rebuttal declarant.	0.1	
12/8/2023	BBK	Drafting email to AHS re new tasks and updates to existing tasks for case tasklist.	0.3	
12/8/2023	BBK	Emailing RBGG team re supplementing Pls' interrogatory responses.	0.2	
12/8/2023	BBK	Reviewing M. Johnson emails to opposing counsel re stipulating to authenticity of docs produced by Ds and re production of data relevant to analyzing BD's staffing at the named plaintiffs' facilities.	0.1	
12/8/2023	AHS	Drafted opposition to motion for sanctions.	0.3	
12/8/2023	AHS	Weekly co-counsel team call.	1.0	
12/8/2023	AHS	Internal debrief and discussion of next steps w BBK, JY, GCG, KS, DLE.	0.3	
12/8/2023	AHS	Updated internal task list and follow up emails w team re tasks and upcoming deadlines.	0.9	
12/8/2023	AX	Meeting with cocounsel re case tasks and strategy.	1.0	
12/8/2023	KES	Calendar discovery and motion deadlines.	0.1	
12/8/2023	KES	Zoom meeting with co-counsel re motions, discovery.	1.3	
12/8/2023	DLE	Attend and note-take co-counsel meeting and debrief.	1.5	
12/8/2023	DLE	Format and circulate notes from meeting with co-counsel.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/11/2023	GCG	Conf w/ JSY re overall tasks and plan for discovery.	0.2	
12/11/2023	JSY	Conf. w/ GCG re Opp to sanctions motion; emails re same.	0.1	
12/11/2023	JSY	Emails re stipulation re inspections.	0.1	
12/11/2023	JSY	Meeting with AHS re sanctions opp.	0.7	
12/11/2023	JSY	Research re sanctions motion and opp; emails re same.	0.5	
12/11/2023	BBK	Reviewing/revising M. Johnson draft stipulation of fact in lieu of inspections.	0.2	
12/11/2023	BBK	Reviewing/revising AHS draft case tasklist; emailing team re same.	0.3	
12/11/2023	BBK	Reviewing opposing counsel email re: supplementing ROG responses; M&C emails re Ds' req to stipulate to accelerate hearing on motion to strike and for sanctions; and M. Johnson email to opposing counsel re stipulation of fact in lieu of inspections.	0.1	
12/11/2023	AHS	Emailed w JY re checking in about sanctions opp.	0.2	
12/11/2023	AHS	Draft sanctions opp.	3.5	
12/11/2023	AHS	Meeting with JSY re: sanctions opp.	0.7	
12/11/2023	KES	Email M. Johnson re text versions of ED depo transcripts.	0.3	
12/12/2023	JSY	Emails re sanctions motion.	0.1	
12/12/2023	BBK	Reviewing emails w/ opposing counsel re Ds' portion to joint discovery letter brief re production of class list, stipulation re: authenticity, and request for additional depositions.	0.1	
12/12/2023	BBK	Emails w/ co-counsel re RFAs re authentication of docs produced by Ds; reviewing same.	0.1	
12/12/2023	AHS	Drafted opposition to motion for sanctions.	6.6	
12/12/2023	AHS	Chatted w KES re Brookdale.	0.1	
12/12/2023	KES	Emails with co-counsel re client files and review files re same.	0.2	
12/13/2023	GCG	Conf w/ and email to JSY re opposition briefs re sanctions and motion to strike.	0.2	
12/13/2023	JSY	Review and edit opp to motions for sanctions; conf. w/ GCG re same; emails re same.	1.7	
12/13/2023	JSY	Review and edit letter brief section re Fleet Safety Policy docs; emails re same.	0.2	
12/13/2023	JSY	Conf. w/ AHS re Opp to MTS.	0.1	
12/13/2023	JSY	Review and edit section of Opp to MTS; emails re same.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 763

SERVICES

Date	Person	Description of Services	Hours	Discount
12/13/2023	BBK	Emails w/ RBGG team re draft of opp to sanctions motion.	0.1	
12/13/2023	BBK	Drafting Pls' portion of joint discovery letter brief re ESI re Fleet Safety Policy modifications/implementation and enforcement.	2.0	
12/13/2023	BBK	Emailing w/ JSY re potential compromise re ESI on Fleet Safety Policy.	0.1	
12/13/2023	BBK	Reviewing and incorporating JSY and G. Wallace comments/revisions to joint letter brief on ESI re Fleet Safety Policy; emailing w/ team re same.	0.3	
12/13/2023	BBK	Reviewing AHS draft opp to sanctions motion and JSY comments/revisions to same.	0.2	
12/13/2023	BBK	Reviewing AHS draft insert to opp to motion to strike re Grunfeld Decl and JSY comments/revisions to same.	0.1	
12/13/2023	BBK	Emailing w/ M. Johnson re addressing likely argument from Ds for letter brief re transportation class list.	0.1	
12/13/2023	AHS	Drafted notice of appearance, including double checking local rules, confirming ECF account, etc.	0.8	
12/13/2023	AHS	Draft insert for motion to strike opp and sent to co-counsel.	1.7	
12/13/2023	AHS	Edited Sanctions Opp.	0.6	
12/13/2023	KES	File NOA for AS.	0.2	
12/14/2023	GCG	Confs w/ JSY re opposition briefs and discovery.	0.2	
12/14/2023	JSY	Conf. w/ GCG and AS re Opp to Sanctions motion; emails re same.	0.5	
12/14/2023	JSY	Conf. w/ GCG re Opp to Sanctions motion.	0.1	
12/14/2023	BBK	Drafting/sending email to opposing counsel w/ joint letter brief for comm'ns re Fleet Safety Policy.	0.2	
12/14/2023	BBK	Reviewing M. Johnson email to Ds requesting supplementation of doc productions.	0.1	
12/14/2023	AHS	Reviewed draft opp to sanctions motion.	0.3	
12/14/2023	AHS	Met with JY to discuss revisions to Opp to Mot for Sanctions.	0.3	
12/14/2023	AHS	Revised Opp to Mot for Sanctions.	0.3	
12/14/2023	AHS	Case emails.	0.1	
12/15/2023	GCG	Meet w/ co-counsel team re discovery issues.	0.6	
12/15/2023	GCG	Follow up meeting w/ RBGG team re meetings w/ named plaintiffs and motion for summary judgment; review and revise opposition to sanctions.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 764

SERVICES

Date	Person	Description of Services	Hours	Discount
12/15/2023	GCG	Review JB email re discovery delays.	0.1	
12/15/2023	GCG	Review and revise draft opposition to sanctions.	0.4	
12/15/2023	GCG	Conf w/ JSY and emails to As re same.	0.2	
12/15/2023	JSY	Team meeting.	0.5	
12/15/2023	JSY	Emails and conf. re sanctions opp.	0.2	
12/15/2023	BBK	Emails re Ds' refusal to stipulate to exceeding 25 Interrogatory limit.	0.1	
12/15/2023	BBK	Meeting w/ co-counsel re opposing Ds' pending motions and completing discovery.	0.5	
12/15/2023	BBK	RBGG team post-co-counsel-meeting debrief.	0.2	
12/15/2023	BBK	Reviewing/revising AHS draft notes from co-counsel meeting and updated tasklist.	0.5	
12/15/2023	BBK	Meeting w/ AHS re case tasks and priorities.	0.5	
12/15/2023	BBK	Drafting motion for partial summary judgment.	2.4	
12/15/2023	BBK	Reviewing M. Johnson emails to opposing counsel re outstanding joint letter brief revisions re staffing formula and response to request to meet and confer on contention ROGs, follow-up on stipulating to expert disclosure deadlines, and re plan to request discovery conference.	0.1	
12/15/2023	BBK	Reviewing M. Johnson draft joint disc letter brief seeking > 25 interrogatories.	0.1	
12/15/2023	BBK	Reviewing Pls' 2d Set of RFAs.	0.1	
12/15/2023	AHS	Reviewed Opp to Mot for Sanctions.	0.3	
12/15/2023	AHS	Researched cases on mootness for Opp to Mot for Sanctions.	0.6	
12/15/2023	AHS	Weekly team call w co-counsel.	0.5	
12/15/2023	AHS	Internal RBGG attorneys call with BBK, JY, GCG, AX.	0.2	
12/15/2023	AHS	Internal call with JY and AX re next steps for comm - w/ named plaintiffs.	0.2	
12/15/2023	AHS	Drafted and circulated notes from co-counsel call and internal call.	0.4	
12/15/2023	AHS	Talked w BBK re: organizing case tasks.	0.5	
12/15/2023	AHS	Revised Opp to Mot for Sanctions and sent to co-counsel.	0.4	
12/15/2023	AX	Meeting with cocounsel re discovery and case tasks.	0.8	
12/15/2023	AX	Emails re cite check.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 765

SERVICES

Date	Person	Description of Services	Hours	Discount
12/16/2023	GCG	Review emails from MJ, GW and JSY re opposition to motion to strike and discovery issues.	0.1	
12/16/2023	JSY	Emails re opp to motion to strike.	0.1	
12/16/2023	BBK	Reviewing emails re: outstanding discovery and draft opp to motion to strike.	0.1	
12/16/2023	AX	Review team emails re status of discovery.	0.1	
12/17/2023	JSY	Edit motion to strike; emails re same.	0.9	
12/17/2023	AX	Review team emails.	0.1	
12/18/2023	GCG	Review and revise opposition to sanctions motion.	0.5	
12/18/2023	GCG	Conf w/ AS and emails to JSY and team re same.	0.2	
12/18/2023	GCG	Review and analyze Washington Post expose on assisted living costs structure including Brookdale.	0.3	
12/18/2023	GCG	Email reporters seeking correction.	0.1	
12/18/2023	GCG	Email GW re experts re industry structure.	0.2	
12/18/2023	JSY	Emails re Opp to MTS.	0.1	
12/18/2023	JSY	Review article re elopements in assisted living industry.	0.1	
12/18/2023	JSY	Conf. w/ AS re Opp to Sanctions motion.	0.1	
12/18/2023	JSY	Emails re Opp to MTS.	0.2	
12/18/2023	JSY	Review and edit Opp to motion for sanctions.	0.5	
12/18/2023	JSY	Draft revised ROG responses for JA, incl. reviewing depo transcripts.	2.9	
12/18/2023	JSY	Emails re finalizing sanctions opp.	0.1	
12/18/2023	BBK	Reviewing J. Bertino / M. Johnson emails re Ds' response to joint letter brief on staffing formula.	0.1	
12/18/2023	BBK	(Billing Judgment) Reviewing Washington Post article re understaffing in assisted living industry and Senior Housing News article re same.	0.0	0.2
12/18/2023	BBK	Reviewing draft Opp to Motion to Strike w/ JSY and M. Johnson comments.	0.3	
12/18/2023	BBK	Emailing w/ RBGG team and co-counsel re finalizing/filing Opps to Motion to Strike and to Sanctions Motion.	0.2	
12/18/2023	BBK	Analyzing/commenting on JSY proposals re supplementing named Pl interrogatory responses.	1.0	
12/18/2023	AHS	Emails re case status.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/18/2023	AHS	Reviewed co-counsel's draft Opp to Mot to Strike.	0.6	
12/18/2023	AHS	Revised Opp to Mot for Sanction.	2.0	
12/18/2023	AHS	(Billing Judgment) Read WaPo article on assisted living facilities.	0.0	0.4
12/18/2023	AHS	Call with JY re Sanctions Opp.	0.1	
12/18/2023	AX	Cite check opp to motion for sanctions.	2.0	
12/18/2023	KES	Finalize and efile opposition to motion for sanctions.	0.3	
12/18/2023	KES	Download and circulate pleadings.	0.1	
12/18/2023	DLE	(Billing Judgment) Save and circulate media articles addressing case.	0.0	0.5
12/19/2023	GCG	Review emails to BBK, GW and MJ re revisions to letter brief.	0.2	
12/19/2023	GCG	Confs w/ JSY re updating interrogatory responses and overall discovery strategy.	0.2	
12/19/2023	JSY	Conf. w/ GCG and AS re ROG supplementation.	0.2	
12/19/2023	JSY	Emails re letter brief edits.	0.2	
12/19/2023	JSY	Emails re discovery conference and other discovery issues.	0.2	
12/19/2023	JSY	Conf. w/ GCG re various discovery issues.	0.1	
12/19/2023	JSY	Review and edit filing re joint discovery conference.	0.3	
12/19/2023	JSY	Review opp to amended motion to strike; multiple emails re same.	0.4	
12/19/2023	JSY	Review draft supplemental ROG responses; emails re same.	0.3	
12/19/2023	JSY	Emails re deadline for supplementing discovery responses.	0.2	
12/19/2023	BBK	Analyzing Ds' portion of joint letter brief re: class list and supporting exhibits; drafting recommendation to RBGG team re addressing same.	0.4	
12/19/2023	BBK	Conferring w/ co-counsel and RBGG team re responding to Ds' section of joint letter brief w/ additional exhibits; analyzing potential docs to include as same.	1.0	
12/19/2023	BBK	Emailing w/ DE re preparing exhibit to joint letter brief; reviewing/revising same.	0.2	
12/19/2023	BBK	Emails w/ GCG and JSY re proposal to co-counsel re: joint letter brief re class list; drafting/sending same to GW and MJ.	0.6	
12/19/2023	BBK	Drafting revisions to joint discovery letter brief re class list and email to Ds re same.	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/19/2023	BBK	Emailing w/ co-counsel re revisions to joint discovery letter brief re class list and email to Ds re same.	0.2	
12/19/2023	BBK	Reviewing multiple emails from opposing counsel re Ds' position on responding to Pls' interrogatories and discovery production.	0.2	
12/19/2023	BBK	Reviewing J. Bertino email re: discovery conference; emailing w/ co-counsel re responding to same and filing request for discovery conference.	0.1	
12/19/2023	BBK	Conferring w/ JSY and AX re reviewing/commenting on draft request for joint disc conference.	0.1	
12/19/2023	BBK	Emailing w/ co-counsel re responding to Ds' refusal to supplement discovery.	0.1	
12/19/2023	BBK	Reviewing Ds' admin motion to accelerate hearing date on 2d and 3d motions to strike and 2d motion for sanctions.	0.1	
12/19/2023	BBK	Emailing w/ co-counsel and JSY re draft opp to motion to strike amended Umpierre Decl.	0.1	
12/19/2023	BBK	Emailing w/ JSY and G. Wallace re supplemental interrogatory responses by named Pls.	0.2	
12/19/2023	BBK	Reviewing AHS legal research re timeliness of supplementing discovery responses and productions per FRCP 23(e) and consequences for failure to do so.	0.1	
12/19/2023	AHS	Researched discovery deadline issues.	3.4	
12/19/2023	AHS	Met w AX re supplemental rog responses for Bernie and Loresia.	0.7	
12/19/2023	AHS	Review and respond to emails re discovery.	0.3	
12/19/2023	AHS	Follow-up on research on supplemental discovery deadline.	0.3	
12/19/2023	AX	Call with AS re discovery responses.	0.7	
12/19/2023	AX	Review team emails re updating client rog responses, including draft redlines.	0.5	
12/19/2023	DLE	Create exhibit for Joint Discovery Letter Brief.	0.8	
12/19/2023	DLE	Save ECF filing and circulate to the team.	0.2	
12/20/2023	GCG	Review emails from MJ and ER re discovery disputes.	0.4	
12/20/2023	GCG	Conf w/ MJ re same.	0.2	
12/20/2023	GCG	Email to MJ and team re Discovery manual for use in deposition disputes.	0.2	
12/20/2023	GCG	Confs w/ JSY re need to discovery conference.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/20/2023	GCG	Review Judge Beeler order re same.	0.1	
12/20/2023	GCG	(Billing Judgment) Email to ER and JB re email issues.	0.0	0.2
12/20/2023	JSY	Conf. w/ GCG re discovery emails.	0.2	
12/20/2023	JSY	Emails re hearing dates.	0.1	
12/20/2023	JSY	Review WaPo article.	0.5	
12/20/2023	JSY	Review case re timing for supplemental discovery responses.	0.2	
12/20/2023	JSY	Emails re hearing date and supplemental ROG responses.	0.3	
12/20/2023	BBK	Conferring w/ co-counsel re draft revisions to joint letter brief re Pls' interrogatories ILO Ds' clarified position.	0.1	
12/20/2023	BBK	Reviewing emails between M. Johnson and opposing counsel re several joint discovery letter briefs, request for discovery conference, Ds' refusal to supplement disc production, and inspections or stipulation in lieu of inspections; conferring w/ team re same.	0.5	
12/20/2023	BBK	Emailing w/ G. Wallace re joint disc letter brief seeking ESI re Fleet Safety Policy.	0.2	
12/20/2023	BBK	Reviewing Court Order moving hearing date for Motion for Leave and associated Motions to Strike and for Sanctions; reviewing Court Order re Ds' deadline to respond to request for disc conference.	0.1	
12/20/2023	BBK	Emailing updates to Plaintiffs re hearing date change for motion for leave; conferring w/ RBGG team re same.	0.4	
12/20/2023	BBK	Emailing w/ P. Lindstrom re attending 2/1 hearing on motion for leave; updating RBGG team re same.	0.1	
12/20/2023	BBK	Internal emails and emails w/ opposing counsel re dispute w/ Ds over depositions.	0.2	
12/20/2023	BBK	Emailing w/ RBGG team re key docs for trial prep.	0.2	
12/20/2023	BBK	Reviewing 3d Set of RFAs served today.	0.1	
12/20/2023	BBK	Researching/drafting motion for partial summary judgment.	2.2	
12/20/2023	AHS	Organized and reviewed emails about discovery.	0.5	
12/21/2023	GCG	Conference with BBK re Motion for Summary Judgment.	0.2	
12/21/2023	GCG	Review emails between ER and JB and MJ re ongoing discovery disputes.	0.1	
12/21/2023	GCG	Texts with JSY and BBK re same.	0.1	
12/21/2023	JSY	Emails re transport to hearing for plaintiff.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/21/2023	JSY	Emails and conf. re discovery emails and filings.	0.2	
12/21/2023	JSY	Emails re opp to motion to strike.	0.1	
12/21/2023	BBK	Conferring w/ RBGG team re assisting B. Jestrabek-Hart to attend 2/1 hearing.	0.2	
12/21/2023	BBK	Reviewing M. Johnson email to Ds re meet and confer process; M. Johnson - E. Rutner emails re depositions and supplementing doc prods.	0.2	
12/21/2023	BBK	Analyzing Ds' revisions to joint letter brief re class list and revising our portion of brief in response.	0.4	
12/21/2023	BBK	Emailing w/ co-counsel and RBGG team re responding to Ds re joint disc ltr brief re class list.	0.2	
12/21/2023	BBK	Emailing w/ opposing counsel re joint disc ltr brief re class list.	0.2	
12/21/2023	BBK	Attending to finalizing joint disc ltr brief re class list and exhibit for filing.	0.2	
12/21/2023	BBK	Conferring w/ JSY, M. Johnson, and G. Wallace re filing joint disc ltr brief re class list.	0.2	
12/21/2023	BBK	Emails w/ L. Castro and M. Johnson re finalizing/filing joint disc ltr brief re class list; reviewing/approving final of same.	0.2	
12/21/2023	BBK	Emails w/ M. Johnson - J. Bertino re meet and confer on stipulating to authenticity of docs; conferring w/ JSY and GCG re attending same for RBGG.	0.2	
12/21/2023	BBK	Emails w/ opposing counsel re Ds' proposal to stipulate re enforcement of Fleet Safety Policy in lieu of joint letter brief to compel discovery of ESI relating to enforcement and modifications re same (including internal comm'ns re same w/ co-counsel).	0.4	
12/21/2023	BBK	Working w/ DE to organize hot docs for trial forwarded by co-counsel.	0.4	
12/21/2023	BBK	Emailing w/ G. Wallace re our understanding of BD's justification for Fleet Safety Policy's legality.	0.2	
12/21/2023	BBK	Phone call w/ GCG re discovery disputes and motion for partial summary judgment.	0.2	
12/21/2023	BBK	Reviewing joint disc letter brief re staffing formula.	0.1	
12/21/2023	BBK	Emails w/ co-counsel re Opp to Motion to Strike Amended Umpierre Decl; reviewing Ds' counter-proposal re expert disclosure deadlines; reviewing M. Johnson report re status of disc disputes.	0.1	
12/21/2023	BBK	Reviewing Ds' filing in response to Pls' request for discovery conference.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/21/2023	BBK	Reviewing M. Johnson draft letter brief re site inspections.	0.1	
12/21/2023	BBK	Researching/drafting motion for partial summary judgment on Fleet Safety Policy.	1.5	
12/21/2023	AHS	Reviewed emails re: discovery disputes.	0.4	
12/21/2023	AHS	Emailed with AX re outreach to plfs Bernie & Loresia.	0.1	
12/21/2023	AX	Research transportation options for Bernie Jestrabek Hart re attending hearing and emails re same.	0.3	
12/21/2023	AX	Review correspondence re stipulation, including draft of stipulation.	0.2	
12/21/2023	AX	Review team emails re discovery letter brief and depositions.	0.4	
12/21/2023	AX	Emails with AS re discovery responses.	0.2	
12/21/2023	AX	Review various team emails re depositions, joint discovery letter brief, and other discovery issues.	0.3	
12/21/2023	DLE	Save and circulate ECF filings to team.	0.8	
12/21/2023	DLE	Organize files in preparation for trial per BBK.	0.5	
12/22/2023	GCG	Conferences with JSY re letter brief and inspections.	0.2	
12/22/2023	GCG	Review emails ER-JB-MJ re same.	0.1	
12/22/2023	JSY	Conf. w/ MTJ and GCG separately re inspections letter brief.	0.4	
12/22/2023	JSY	Review briefing re discovery conference and joint letter briefs/stipulation re inspections; multiple emails re same.	1.5	
12/22/2023	JSY	Emails with JA.	0.1	
12/22/2023	AHS	Reviewed internal task list.	0.1	
12/22/2023	AX	Email correspondence with team re weekly team meeting.	0.2	
12/22/2023	AX	Review email correspondence, including draft of joint letter brief re site inspections.	1.0	
12/26/2023	JSY	Conf. w/ GCG re order re discovery; emails re same.	0.2	
12/26/2023	JSY	Emails re time to discuss ROG responses with JA.	0.1	
12/26/2023	JSY	Emails re Supp ROG responses.	0.2	
12/26/2023	JSY	Emails re discovery order.	0.2	
12/26/2023	JSY	Emails re time to speak to JA.	0.1	
12/27/2023	GCG	Conferences with JSY re Magistrate Judge order and discovery approach.	0.1	
12/27/2023	JSY	Emails re discovery order.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 771

SERVICES

Date	Person	Description of Services	Hours	Discount
12/27/2023	JSY	Conf. w/ MTJ and GBW re discovery issues and order from Judge B; conf. w/ GCG re same.	0.5	
12/27/2023	JSY	Conf w/ AX re ROG responses; emails re same.	0.2	
12/27/2023	JSY	Emails re clarification request from court.	0.1	
12/27/2023	AX	Call with JSY re case projects.	0.4	
12/28/2023	GCG	Conference with JSY re meeting with clients to update and supplement interrogatories.	0.2	
12/28/2023	GCG	Email MJ-ER re joint request for clarification of order.	0.1	
12/28/2023	JSY	Conf. w/ JA; draft memo re same.	0.5	
12/29/2023	GCG	Participate in meeting with co-counsel team re motions to compel and depositions.	0.9	
12/29/2023	GCG	Conference with JSY re call with named Plaintiff and plan for trial.	0.2	
12/29/2023	GCG	Emails and texts JSY-team re MJ demand for sealing response.	0.2	
12/29/2023	JSY	Conf. w/ GCG re case tasks.	0.2	
12/29/2023	JSY	Team meeting.	1.0	
12/29/2023	JSY	Emails re team meeting.	0.1	
12/29/2023	BBK	Comm'ns w/ GCG, JSY and AX re meeting and conferring w/ Ds on 1/2, drafting motion to compel additional depositions, and drafting Pls' portions of omnibus sealing motion re docs ISO motion for leave.	0.1	
12/29/2023	AHS	Emails re co-counsel meeting.	0.2	
12/29/2023	AX	Emails re case tasks and sealing issues.	0.2	
12/30/2023	GCG	Review Judge Beeler order.	0.1	
12/30/2023	GCG	Email with JSY re same.	0.1	
12/31/2023	GCG	Email GW, MJ, and JSY re MJ order.	0.1	
1/1/2024	GCG	Review and revise meet & confer agenda items.	0.2	
1/1/2024	GCG	Emails with GW and MJ re same and re discovery cut-off issues.	0.1	
1/1/2024	GCG	Prepare for and conduct meeting with GW and MJ re pending motions to compel and motion for extension of discovery cut-off.	0.8	
1/1/2024	GCG	Follow-up email to RBGG team summarizing plan.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/2/2024	GCG	Review and revise supplemental ROG responses for plaintiffs.	0.2	
1/2/2024	GCG	Confs w/ and emails w/ JSY and BBK re follow up to MJ Beeler order.	0.2	
1/2/2024	GCG	Email to BBK re motion to compel.	0.2	
1/2/2024	GCG	Research and draft letter to JA.	0.2	
1/2/2024	GCG	Conf w/ and emails to AX and JSY re omnibus motion to seal re motion for leave.	0.2	
1/2/2024	JSY	Conf. w/ BBK re status of discovery issues.	0.4	
1/2/2024	JSY	Conf. w/ AX and GCG re sealing motion.	0.5	
1/2/2024	JSY	Emails re letter to JA.	0.1	
1/2/2024	JSY	Emails re sealing motion.	0.3	
1/2/2024	JSY	Conf. two times with AX re sealing motion.	0.2	
1/2/2024	JSY	Review materials for sealing motion; edits to same; emails re same.	0.9	
1/2/2024	BBK	Emails w/ co-counsel re joint disc ltr brief re inspections of San Ramon and Scotts Valley and strategy re same.	0.1	
1/2/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re requesting clarification on Court's 12/22 Order re request for discovery conference and joint discovery letter briefs and emails re: expert disclosures dates.	0.2	
1/2/2024	BBK	Reviewing JSY report re call w/ J. Algarme.	0.1	
1/2/2024	BBK	Reviewing Court's 12/30 Order re discovery issues and comm'ns w/ co-counsel re same.	0.2	
1/2/2024	BBK	Reviewing Ds' Replies ISO Motion to Strike and Motion for Sanctions.	0.2	
1/2/2024	BBK	Reviewing M. Johnson's proposed agenda for 1/2 meet and confer; emailing w/ GCG/JSY re plan for same.	0.2	
1/2/2024	BBK	Phone call w/ JSY re discovery disputes and motions to compel.	0.4	
1/2/2024	BBK	Emailing w/ co-counsel and RBGG team re DSS citations to six named Pls' facilities.	0.1	
1/2/2024	BBK	Analyzing Ds' portion of joint disc letter brief re ESI on Fleet Safety Policy; drafting report and recommendation to co-counsel re same.	0.5	
1/2/2024	BBK	Emailing w/ co-counsel re: discovery dispute over ESI re Fleet Safety Policy.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/2/2024	BBK	Preparing motion to compel, admin sealing motion, and associated pleadings.	0.2	
1/2/2024	BBK	Meeting and conferring w/ Ds re discovery and scheduling issues.	1.5	
1/2/2024	BBK	Preparing notes from and e-mail report to co-counsel and RBGG team re meet and confer.	0.7	
1/2/2024	BBK	Conferring w/ team re omnibus sealing motion for docs submitted w/ motion for leave; reviewing emails w/ opposing counsel re same.	0.1	
1/2/2024	BBK	Reviewing/reporting to team re: Judge Beeler's updated standing order.	0.1	
1/2/2024	BBK	Phone call w/ GCG re motion to compel class list and meet and confer w/ Ds.	0.1	
1/2/2024	BBK	Preparing/drafting motion to compel class list.	1.4	
1/2/2024	AX	Call with GCG re sealing.	0.1	
1/2/2024	AX	Calls with JSY re Brookdale sealing motion.	0.7	
1/2/2024	AX	Calls with KES re sealing motion.	0.5	
1/2/2024	AX	Review documents in connection with sealing motion; revise proposed order for omnibus motion.	6.0	
1/2/2024	KES	Review Defs proposed redactions for Kennedy and Flores Decls and compare with prior sealing orders and public declarations; propose oppositions to Defs redaction requests.	3.5	
1/3/2024	GCG	Confs w/ and emails to JSY re sealing, motions to compel and trial schedule.	0.2	
1/3/2024	GCG	Conf w/ and emails to AX re omnibus motion to seal.	0.2	
1/3/2024	GCG	Revise email to defendants re case schedule.	0.1	
1/3/2024	GCG	Emails w/ BBK re motion to compel.	0.1	
1/3/2024	JSY	Conf. w/ AX and KES re sealing motion.	0.2	
1/3/2024	JSY	Emails and conf. re motions to compel.	0.2	
1/3/2024	JSY	Review and edit sealing mtn and related documents; emails re same.	0.7	
1/3/2024	JSY	Conf. w/ GCG re motions and filings; multiple emails re same.	0.3	
1/3/2024	JSY	Conf. w/ AX re further edits to motion to seal.	0.1	
1/3/2024	BBK	Reviewing emails w/ opposing counsel re finalizing/filing Omnibus sealing motion.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 774

SERVICES

Date	Person	Description of Services	Hours	Discount
1/3/2024	BBK	Conferring w/ GCG, AX and JSY re motion to compel class list.	0.1	
1/3/2024	BBK	Emails w/ co-counsel and RBGG team re proposal to Ds re extension of discovery cut-off, expert disclosures, and dispositive motions hearing date.	0.1	
1/3/2024	BBK	Preparing/drafting motion to compel class list.	3.0	
1/3/2024	AX	Draft proposed order.	1.5	
1/3/2024	AX	Draft pls' section of omnibus motion to seal.	2.5	
1/3/2024	AX	Call with KES re sealing.	0.3	
1/3/2024	AX	Calls with JSY re sealing.	0.2	
1/3/2024	AX	Emails with Defs re sealing motion; review proposed order and documents.	1.0	
1/3/2024	AX	Revise sealing motion and review Defs' revised proposed order.	0.6	
1/3/2024	AX	Finalize proposed order, sealing motion, emails re same.	0.5	
1/3/2024	KES	TC potential witness re conditions at San Ramon.	0.3	
1/4/2024	GCG	Confs w/ JSY and emails to MJ and GW re response to defendants re case schedule stipulation.	0.3	
1/4/2024	GCG	Confs w/ JSY and emails to BBK and JSY re motion to compel class list.	0.2	
1/4/2024	GCG	Emails to MJ and ER re case schedule.	0.2	
1/4/2024	JSY	Two conf. w/ BBK re motion to compel class list.	0.3	
1/4/2024	JSY	Multiple conf. w/ MTJ re case schedule and motions to compel.	0.3	
1/4/2024	JSY	Emails and messages re case schedule.	0.2	
1/4/2024	JSY	Conf. w/ GCG re case schedule, motion for leave hearing, motions to compel.	0.3	
1/4/2024	JSY	Review and edit letter brief re site inspections; emails re same.	0.6	
1/4/2024	JSY	Prepare sealing pleadings re Motion to Compel class list; emails re same.	1.2	
1/4/2024	JSY	Review and edit motion to compel class list; emails re same.	0.6	
1/4/2024	BBK	Phone call w/ JSY re motion to compel and supporting pleadings.	0.3	
1/4/2024	BBK	Conferring w/ JSY re preparing sealing pleadings for motion to compel.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 775

SERVICES

Date	Person	Description of Services	Hours	Discount
1/4/2024	BBK	Emails w/ co-counsel and opposing counsel re stip to extend pre-trial deadlines.	0.1	
1/4/2024	BBK	Emails w/ co-counsel re revisions to joint letter discovery brief on site inspections.	0.1	
1/4/2024	BBK	Emails w/ team re under seal docs filed w/ omnibus sealing motion.	0.1	
1/4/2024	BBK	Drafting motion to compel.	5.4	
1/4/2024	BBK	Reviewing JSY comments/revisions to motion to compel and revising accordingly (including additional research for same).	1.2	
1/4/2024	BBK	Drafting BBK Decl and Proposed Order ISO Motion to Compel (including IDing exhibits for same).	1.3	
1/4/2024	BBK	Emailing w/ RBGG team re tasks needed to finalize and file motion to compel.	0.1	
1/4/2024	KES	Download and circulate pleadings and follow up re under seal docs.	0.3	
1/4/2024	KES	Download and organize Jacobsen exhibits filed under seal.	0.2	
1/5/2024	GCG	Conf w/ AX re sealing issues.	0.1	
1/5/2024	GCG	Prepare for and conduct meet and confer w/ ER, MJ, JB, GW and MJ re case schedule stipulation.	0.8	
1/5/2024	GCG	Confs w/ and emails to GW, JSY and BBK re same.	0.5	
1/5/2024	GCG	Emails to ER and GW re scope of stipulation.	0.5	
1/5/2024	GCG	Review and revise draft stipulation.	0.5	
1/5/2024	GCG	Review and revise draft Wallace declaration ISO change to trial schedule.	0.5	
1/5/2024	GCG	Confs w/ GW re same and re overall strategy and approach.	0.4	
1/5/2024	GCG	Confs w/ BBK re motion to extend discovery deadline.	0.3	
1/5/2024	GCG	Review BBK research re local rules.	0.2	
1/5/2024	GCG	Participate in meeting w/ co-counsel team re extending schedule and inspections.	0.7	
1/5/2024	GCG	Draft notes of meet and confer w/ ER for team.	0.2	
1/5/2024	JSY	Team meeting.	0.4	
1/5/2024	JSY	Review and edit docs re motion to compel class list; emails re same.	0.4	
1/5/2024	JSY	Draft stipulation and declaration re modifying case schedule; multiple emails and conf. re same.	2.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/5/2024	JSY	Further emails re stipulation and GBW declaration re case schedule.	0.1	
1/5/2024	BBK	Further revisions to motion to compel class list and supporting declaration.	0.4	
1/5/2024	BBK	Emailing AX re motion to compel.	0.1	
1/5/2024	BBK	Emailing w/ co-counsel re revisions/comments on motion to compel.	0.1	
1/5/2024	BBK	Preparing motion to compel and supporting pleadings for filing.	0.3	
1/5/2024	BBK	Emails with KES re preparing under seal and redacted exhibits for motion to compel and filing same.	0.2	
1/5/2024	BBK	Reviewing/finalizing JSY draft sealing papers for motion to compel (admin motion, appendix A, and proposed order).	0.2	
1/5/2024	BBK	Emails and phone call w/ KES re preparing exhibits for motion to compel; reviewing/approving same.	0.5	
1/5/2024	BBK	Emails w/ JSY and GCG re plan for and updates re finalizing and filing motion to compel.	0.1	
1/5/2024	BBK	Revising motion to compel to add citations to BBK Decl and supporting exhibits.	0.8	
1/5/2024	BBK	Reviewing AX edits to motion to compel and revising same.	0.3	
1/5/2024	BBK	Revising motion to compel, BBK declaration, and sealing motion to include additional exhibits; emailing same to co-counsel.	0.4	
1/5/2024	BBK	Reviewing Ds' counter-proposal re stipulation to extend pre-trial deadlines and continue trial and GCG report on meet and confer re same.	0.2	
1/5/2024	BBK	Emailing w'/ GCG and JSY re preparing stipulation re extension of pre-trial deadlines and continuing trial.	0.2	
1/5/2024	BBK	Meeting w/ co-counsel re case priorities.	0.4	
1/5/2024	BBK	Phone call w/ GCG re drafting admin motion to extend fact and expert discovery cutoffs.	0.2	
1/5/2024	BBK	Reviewing G. Wallace - E. Rutner emails negotiating stip re extending pre-trial deadlines and continuing trial.	0.2	
1/5/2024	BBK	Meeting w/ GCG and JSY re negotiations over stipulation and drafting motion to extend discovery cutoffs.	0.3	
1/5/2024	BBK	Researching and drafting admin motion to modify case schedule and supporting papers.	1.2	
1/5/2024	BBK	Meeting w/ GCG and JSY re joint motion and stipulation to move trial date and pre-trial deadlines.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/5/2024	BBK	Researching Local Rule reqs form and content of motion seeking to move trial and pre-trial deadlines and reporting to team re same.	0.3	
1/5/2024	BBK	Reviewing JSY draft stip to continue trial date and pre-trial deadlines and supporting Wallace Decl.	0.1	
1/5/2024	AX	Review and edit MTC.	2.5	
1/5/2024	AX	Team call re projects, discovery issues.	0.4	
1/5/2024	FGL	(Billing Judgment) Review BBK email re draft Wallace Declaration iso Admin Motion to Modify Case Schedule and draft Proposed Order and draft/format shells re same.	0.0	0.3
1/5/2024	KES	Prepare under seal and redacted versions of exhibits A-P to BBK Decl ISO Motion to Compel; confer BBK re same.	3.0	
1/5/2024	DLE	Attend and take notes for weekly co-counsel meeting to discuss case tasks.	0.4	
1/6/2024	GCG	Emails to JSY, GW and ER re proposed stipulation to change case schedule.	0.2	
1/6/2024	JSY	Review revised version of stipulation and GBW declaration re case schedule; emails re same.	0.3	
1/7/2024	GCG	Review JB research on challenges to illegal policy.	0.1	
1/7/2024	GCG	Draft email to BBK re same.	0.1	
1/7/2024	BBK	Reviewing G Wallace comments on motion to compel and J. Bybee legal research re Fleet Safety Policy; emailing proposed addition to motion to compel addressing same.	0.5	
1/8/2024	GCG	Confs w/ JSY re stipulation to extend discovery deadline and trial and motions to compel.	0.3	
1/8/2024	GCG	Emails to BBK and team re motions to compel.	0.1	
1/8/2024	GCG	Email to JSY and BBK re research re motion for more than 10 depositions.	0.1	
1/8/2024	GCG	Email to team re rog responses.	0.1	
1/8/2024	JSY	Emails and conf re stipulation re case schedule.	0.2	
1/8/2024	JSY	Emails re motion to compel class list.	0.1	
1/8/2024	JSY	Emails re Rule 26(f) conference and discovery.	0.4	
1/8/2024	JSY	Conf. w/ BBK and GCG re discovery motions.	0.3	
1/8/2024	BBK	Reviewing E. Rutner comments and proposed revisions to draft stip re: case schedule; conferring w/ co-counsel re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/8/2024	BBK	Revising Motion to Compel Class List based on GWallace comments.	0.4	
1/8/2024	BBK	Emailing w/ GCG re legal research on facial challenges to unlawful policies.	0.1	
1/8/2024	BBK	Attending to finalizing/filing Motion to Compel and supporting pleadings (including comm'ns w/ KES, JSY re same).	4.1	
1/8/2024	BBK	Emailing w/ JSY re priorities and staffing for additional motions to compel.	0.2	
1/8/2024	BBK	Analyzing notes from 1/2 meet and confer re parties agreement to resolve dispute over ESI on Fleet Safety Policy via joint letter brief.	0.2	
1/8/2024	BBK	Phone call w/ JSY re additional motions to compel and joint letter briefs.	0.1	
1/8/2024	BBK	Emails w/ GCG and JSY re joint letter brief and/or motion to compel re additional depositions.	0.1	
1/8/2024	KES	Finalize BBK Decl and redacted and under seal exhibits; draft index re same.	1.1	
1/8/2024	KES	Review, finalize, serve and efile motion to compel and related admin motion to seal; email proposed orders to chambers re same.	1.7	
1/8/2024	KES	Download and organize filed pleadings.	0.4	
1/8/2024	KES	Calendar motion related deadlines.	0.2	
1/9/2024	GCG	Review and analyze court order re trial schedule.	0.1	
1/9/2024	GCG	Email BBK re motion to compel.	0.1	
1/9/2024	JSY	Conf. w/ BBK re discovery disputes and letter briefs.	0.2	
1/9/2024	JSY	Emails re case schedule order and ROG responses.	0.1	
1/9/2024	JSY	Emails re ROG responses.	0.1	
1/9/2024	JSY	Emails re discovery motions.	0.1	
1/9/2024	BBK	Emailing w/ KES re court's request re timing/method of serving chambers copies of motion to compel; responding to court re same.	0.2	
1/9/2024	BBK	Emailing w/ co-counsel re chambers copies for joint letter brief on site inspections.	0.1	
1/9/2024	BBK	Drafting recommendation to co-counsel re moving to compel additional depositions.	0.4	
1/9/2024	BBK	Emailing w/ G. Wallace and M. Johnson re moving to compel additional depositions.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 779

SERVICES

Date	Person	Description of Services	Hours	Discount
1/9/2024	BBK	Reviewing Court's Order on motion to seal docs filed w/ Reply ISO Admin Motion re Class Notice; reporting on same to team.	0.2	
1/9/2024	BBK	Analyzing Ds' responses to Pls' ROGS and 11th Set of RFPs.	0.3	
1/9/2024	BBK	Emailing JSY re Ds' response to ROG on legality of Fleet Safety Policy.	0.1	
1/9/2024	BBK	Reviewing Court's Amended Scheduling Order IRT Stipulation; reporting on same to team.	0.1	
1/9/2024	BBK	Reviewing E. Rutner - G. Wallace emails re abiding by stipulation re: limits on discovery ILO Court's Order amending case schedule.	0.1	
1/9/2024	BBK	Drafting revised portion of joint letter brief seeking production of ESI re Fleet Safety Policy.	2.1	
1/9/2024	BBK	Drafting emails to JSY and co-counsel re revised portion of joint letter brief seeking production of ESI re Fleet Safety Policy.	0.1	
1/9/2024	BBK	Conducting research for motion to compel additional depositions.	0.2	
1/9/2024	BBK	Conferring w/ KES re discovery disputes and amended case schedule.	0.2	
1/9/2024	BBK	Emailing w/ G. Wallace, M. Johnson and JSY re moving to compel additional transportation-related docs.	0.2	
1/9/2024	AHS	(Billing Judgment) Case emails.	0.0	0.2
1/9/2024	KES	Prepare chambers copies of motion to compel and related admin motion to seal.	2.3	
1/9/2024	DLE	Schedule new hearing deadlines per new scheduling order.	0.4	
1/10/2024	JSY	Emails re discovery disputes.	0.1	
1/10/2024	JSY	Emails re named plaintiffs and hearing re motion for leave.	0.1	
1/10/2024	BBK	Emailing w/ named Pls P. Lindstrom and B. Jestrabek-Hart re 2/1 hearing on motion for leave.	0.2	
1/10/2024	BBK	Emailing w/ JSY and KES re arranging for accessible transportation to 2/1 hearing for P. Lindstrom and B. Jestrabek-Hart from Scotts Valley.	0.2	
1/10/2024	BBK	Drafting recommendation to JSY re responding to co-counsel re: motion to compel additional docs relating to Fleet Safety Policy along w/ ESI; emailing w/ JSY re same.	0.3	
1/10/2024	BBK	Drafting response to co-counsel re: motion to compel additional docs relating to Fleet Safety Policy along w/ ESI.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/10/2024	BBK	Reviewing M&C email by M. Johnson confirming impasse on ROGs or RFP Set 11.	0.1	
1/10/2024	BBK	Researching/preparing joint letter brief seeking additional depositions.	0.5	
1/10/2024	KES	(Billing Judgment) Research wheelchair accessible transportation options for client attendance at hearing.	0.0	1.8
1/11/2024	JSY	Edit letter brief re depositions; emails re same.	0.4	
1/11/2024	JSY	Emails re team meeting.	0.1	
1/11/2024	BBK	Reviewing M. Johnson emails to Ds to FU on status of production of data needed for staffing analysis.	0.1	
1/11/2024	BBK	Conferring w/ KES re accessible transportation options for clients to attend 2/1 hearing on motion for leave.	0.1	
1/11/2024	BBK	Researching/drafting joint letter brief for additional depositions.	5.6	
1/11/2024	BBK	Emailing w/ JSY re joint letter brief for additional depositions and FU w/ co-counsel re meeting and conferring on additional docs relating to Fleet Safety Policy.	0.1	
1/11/2024	BBK	Reviewing JSY comments/revisions to joint letter brief for additional depositions; revising accordingly.	0.8	
1/11/2024	BBK	Emailing co-counsel re joint letter brief on additional depositions.	0.1	
1/12/2024	JSY	Team meeting.	1.0	
1/12/2024	JSY	Emails re letter briefs.	0.2	
1/12/2024	BBK	Reviewing M. Johnson draft letter requesting supplementation of Ds' discovery responses and supplemental doc productions.	0.1	
1/12/2024	BBK	Meeting w/ co-counsel re discovery disputes, motions to compel, expert reports, and hearing on Motion for Leave.	0.9	
1/12/2024	BBK	Debriefing w/ JSY and AHS post-co-counsel meeting re assignments for upcoming briefing.	0.1	
1/12/2024	BBK	Revising joint letter brief re ESI on Fleet Safety Policy to include other RFPs seeking docs relating to same.	1.0	
1/12/2024	BBK	Emails w/ JSY and co-counsel re revised joint letter brief re Fleet Safety Policy ESI and documents.	0.2	
1/12/2024	BBK	Reviewing/incorporating T. Close additions to revised joint letter brief re Fleet Safety Policy ESI and documents.	0.3	
1/12/2024	BBK	Revising draft letter brief seeking to compel additional depositions.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/12/2024	BBK	Reviewing M. Johnson draft letter proposing search terms and custodians for supplemental ESI production.	0.1	
1/12/2024	AHS	Review emails and drafts in preparation for co-counsel call.	0.1	
1/12/2024	AHS	Meeting with JY, BBK, DLE, and co-counsel.	0.9	
1/12/2024	AHS	Follow up check-in and assigning of motions to compel with JY, BBK, and DLE.	0.1	
1/12/2024	AX	Attend Brookdale team meeting.	0.8	
1/12/2024	DLE	Attend and note-take weekly co-counsel meeting.	0.9	
1/12/2024	DLE	(Reduced Charge) Attend and note-take firm-only debrief meeting.	0.1	0.3
1/12/2024	DLE	Finalize and circulate notes from co-counsel meeting and firm-only debrief.	0.2	
1/13/2024	BBK	Emailing w/ G. Wallace re legal research for joint letter brief on ESI and docs re Fleet Safety Policy.	0.1	
1/14/2024	BBK	Conducting legal research for joint letter brief re Fleet Safety Policy ESI/docs and revising accordingly; emailing co-counsel re same.	1.3	
1/15/2024	GCG	Review and analyze emails from GW, MJ and BBK re fleet safety documents and ESI.	0.1	
1/15/2024	BBK	Emailing w/ co-counsel re revised joint letter brief re ESI/docs on Fleet Safety Policy.	0.1	
1/16/2024	GCG	(Billing Judgment) Review and analyze use of congressional hearings in case review.	0.0	0.5
1/16/2024	GCG	Emails to ER and BBK re joint brief re fleet safety.	0.1	
1/16/2024	JSY	Emails re discovery briefs.	0.1	
1/16/2024	BBK	Emailing w/ DE re meet and confer letters by M. Johnson re supplementing discovery responses and ESI search terms and custodians.	0.1	
1/16/2024	BBK	Further revisions to joint letter brief re FSP documents and ESI and sending same to Ds.	0.5	
1/16/2024	BBK	Conferring w/ RBGG team re joint letter brief seeking to compel adequate 30b6 testimony re FSP.	0.1	
1/16/2024	BBK	Emailing w/ opposing counsel re joint letter brief on FSP ESI and docs; reviewing emails w/ DDs re impasse on 30b6 testimony re: ESI.	0.1	
1/16/2024	BBK	Reviewing Ds' filing re admin motion to seal docs filed w/ Pls' motion to compel.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 782

SERVICES

Date	Person	Description of Services	Hours	Discount
1/16/2024	BBK	Revising joint letter brief on additional depositions based on co-counsel comments on 1/12.	1.3	
1/16/2024	BBK	Reviewing G. Wallace comments on changes to additional depositions sought and reporting on same to RBGG team.	0.2	
1/16/2024	BBK	Emailing w/ co-counsel and RBGG team re changes to additional depositions sought and identifying happy camper declarants who are unavailable for trial.	0.5	
1/16/2024	AHS	(Billing Judgment) Read WaPo article re: deaths at assisted living facilities and Senate hearing on the topic.	0.0	0.2
1/16/2024	KES	Online research re Casey letter.	0.6	
1/16/2024	KES	Download and circulate pleadings.	0.2	
1/16/2024	KES	Update electronic files.	0.1	
1/16/2024	DLE	Save and circulate copies of final letters to defendants.	0.3	
1/17/2024	GCG	Confs w/ JSY and BBK re motions to compel.	0.2	
1/17/2024	GCG	Emails to MJ, JB and team re motions to compel and sealing filing.	0.1	
1/17/2024	JSY	Conf. w/ GCG re discovery briefs.	0.1	
1/17/2024	JSY	Emails re transportation for clients to hearing.	0.2	
1/17/2024	BBK	Emailing w/ co-counsel re identifying BD Scotts Valley EDs and HWDs and status of happy camper declarants who reside(d) there.	0.2	
1/17/2024	BBK	Reviewing emails w/ opposing counsel re production of missing staffing data from 6 facilities and re request for supplementation of doc production and proposed ESI search terms and custodians.	0.1	
1/17/2024	BBK	Reviewing GCG report re Senate investigation into understaffing at assisted living facilities.	0.1	
1/17/2024	BBK	Revising/commenting on M. Johnson draft letter brief re 30(b)(6) deposition on Fleet Safety Policy.	0.9	
1/17/2024	BBK	Emailing w/ co-counsel re joint letter brief moving to compel other 30(b)(6) depositions.	0.1	
1/17/2024	BBK	Emailing w/ RBGG team re arranging for accessible transportation for B. Jestrabek-Hart and P. Lindstrom to 2/1 hearing on motion for leave.	0.2	
1/17/2024	BBK	Emails w/ AX and JSY re draft letter brief to compel responses to interrogatories.	0.1	
1/17/2024	BBK	Revising/commenting on AX's draft letter brief to compel responses to interrogatories.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/17/2024	BBK	Reviewing M. Johnson proposed revisions to draft letter brief re additional depositions and revising accordingly.	0.8	
1/17/2024	KES	(Billing Judgment) Book WAV transportation for clients for Feb 1 hearing.	0.0	2.8
1/18/2024	GCG	Confs w/ and emails to JSY re plaintiff Algarme standing for injunctive relief.	0.2	
1/18/2024	JSY	Conf. w/ BBK re discovery brief.	0.1	
1/18/2024	JSY	Review and edit letter brief re ROG responses; emails re same.	0.4	
1/18/2024	JSY	Review and edit brief re Brookhurst site inspection; emails re same.	0.5	
1/18/2024	JSY	Meeting with BBK and AS re discovery briefs.	0.4	
1/18/2024	JSY	Conf. w/ JA re various issues.	0.2	
1/18/2024	JSY	Emails re JA status to team.	0.1	
1/18/2024	JSY	Conf. and emails re JA injunctive relief claim.	0.2	
1/18/2024	JSY	Review letter brief re ROGs; emails re same.	0.7	
1/18/2024	BBK	Further revisions to draft letter brief to compel answers to interrogatories.	0.8	
1/18/2024	BBK	Emailing w/ JSY and AHS re plan for discovery briefing.	0.2	
1/18/2024	BBK	Conferring w/ JSY re revisions to letter brief re interrogatories.	0.1	
1/18/2024	BBK	Emailing w/ co-counsel and JSY re draft letter brief on interrogatories and draft letter brief on inspection of Brookhurst facility.	0.2	
1/18/2024	BBK	Reviewing M. Johnson email response to Ds re: their obligations to make supplemental production of docs and engage in M&C re ESI search terms and custodians.	0.1	
1/18/2024	BBK	Preparing for meeting w/ JSY and AHS re plan to complete discovery briefing.	0.2	
1/18/2024	BBK	Meeting w/ JSY and AHS re briefing on various discovery disputes and Reply ISO Motion to Compel.	0.7	
1/18/2024	BBK	Reviewing JSY report re PC w/ J. Algarme.	0.1	
1/18/2024	BBK	Further revisions to draft letter brief re additional depositions.	1.0	
1/18/2024	BBK	Emailing w/ JSY and M. Johnson re analyzing 30(b)(6) testimony to ID other designees for whom we should move to compel adequate testimony.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 784

SERVICES

Date	Person	Description of Services	Hours	Discount
1/18/2024	BBK	Reviewing JSY revisions to letter brief on interrogatories IRT co-counsel comments.	0.1	
1/18/2024	BBK	Reviewing G Wallace final draft letter brief re inspection of Brookhurst.	0.1	
1/18/2024	BBK	Emailing w/ co-counsel re finalizing and sending letter brief re additional depositions to Ds.	0.2	
1/18/2024	BBK	Finalizing and sending letter brief re additional depositions to Ds.	0.2	
1/18/2024	AHS	Discussed Brookdale status with KS.	0.2	
1/18/2024	AHS	Emails re discovery issues.	0.1	
1/18/2024	AHS	Meeting re discovery letter briefs.	0.7	
1/19/2024	GCG	Prepare for and conduct meeting w/ co-counsel re motions to compel and preparation for oral argument on motion to leave.	1.0	
1/19/2024	GCG	Internal meeting w/ RBGG team re trial preparation and congressional inquiry into Brookdale understaffing.	0.5	
1/19/2024	JSY	Emails re injunctive relief for Brookhurst.	0.2	
1/19/2024	JSY	Emails re discovery briefs.	0.1	
1/19/2024	JSY	Meeting with RBGG team re case tasks and priorities.	0.4	
1/19/2024	JSY	Attend team meeting.	0.5	
1/19/2024	JSY	Conf. w/ GCG re status of discovery issues.	0.1	
1/19/2024	BBK	Emailing w/ co-counsel and RBGG team re opposing counsel's response re: receipt of joint letter brief drafts and re: sending draft of letter brief re: interrogatory responses.	0.1	
1/19/2024	BBK	Reviewing M. Johnson email to Ds proposing narrowed custodian list for supplemental ESI production; reviewing emails from opposing counsel re: doc production and service of responses to 3d set of RFAs.	0.1	
1/19/2024	BBK	Meeting w/ co-counsel re: briefing discovery disputes, supplementing Pls' discovery responses, and prep for hearing on Motion for Leave.	0.8	
1/19/2024	BBK	Conferring w/ KES re transportation arrangements for clients to attend motion for leave hearing; updating B. Jestrabek-Hart and P. Lindstrom re same.	0.2	
1/19/2024	BBK	Meeting w/ RBGG team re immediate and medium-term case tasks and priorities.	0.4	
1/19/2024	BBK	Phone call w/ AX re drafting letter brief on staffing data and preparing materials for Congressional hearing on understaffing in assisted living.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/19/2024	AHS	Weekly meeting with co-counsel.	0.9	
1/19/2024	AHS	Internal RBGG team meeting re: next steps and tasks on our plate.	0.4	
1/19/2024	AHS	Update internal case tasks list.	0.1	
1/19/2024	KES	Gather and organize materials for oral argument prep and emails to GCG re same.	0.9	
1/19/2024	KES	(Billing Judgment) Emails with team and co-counsel re WAV transportation for clients for the hearing.	0.0	0.4
1/19/2024	KES	Zoom meeting with co-counsel re argument and discovery.	0.8	
1/19/2024	KES	Review files and emails re prior deposition summaries.	0.3	
1/19/2024	DLE	Attend and note-take team meeting re case issues and tasks.	0.9	
1/19/2024	DLE	Attend and note-take firm-only team meeting debrief to discuss firm case tasks.	0.4	
1/19/2024	DLE	Finalize and circulate notes from team meeting and firm-only debrief.	0.3	
1/20/2024	GCG	Review "hot document" emails re understaffing at Fountaingrove and Scotts' Valley.	0.1	
1/21/2024	GCG	Prepare for moot of February 1 oral argument.	0.1	
1/22/2024	GCG	Conf w/ JSY re discovery status.	0.1	
1/22/2024	GCG	Emails to AX, BBK and team re same.	0.1	
1/22/2024	JSY	Emails re letter to Defs re outstanding discovery disputes.	0.1	
1/22/2024	JSY	Conf. w/ GCG re settlement in similar case.	0.1	
1/22/2024	JSY	Emails re stipulation re motion to seal.	0.1	
1/22/2024	BBK	Reviewing M. Johnson emails w/ opposing counsel re Ds' supp production to Carlson ROG identifying EDs and HWDs for Scotts Valley and San Ramon since March 2021.	0.1	
1/22/2024	BBK	Emailing w/ M. Johnson re whether to revise letter brief seeking additional depositions ILO Ds' supp ROG response.	0.3	
1/22/2024	BBK	Reviewing/commenting on M. Johnson draft email to opposing counsel re categories of discovery.	0.2	
1/22/2024	BBK	Conferring w/ team re Ds' request to stipulate to redactions to document Ds plan to submit w/ Opp to Motion to Compel Class List; reviewing AX emails w/ opposing counsel re same.	0.2	
1/22/2024	AHS	(Billing Judgment) Downloaded motion to compel briefing from Brookdale.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
1/22/2024	AX	Emails re sealing with opposing counsel and team; review of stipulation re same.	1.0	
1/22/2024	KES	Email co-counsel re declaration.	0.1	
1/23/2024	GCG	Conf w/ AX re letter to Senator Casey re staffing issues.	0.1	
1/23/2024	GCG	Emails to BBK, MJ and GW re defendants' opposition to motion to compel class list.	0.2	
1/23/2024	JSY	Conf. w/ BBK and AHS re Opposition to MTC re class list.	0.5	
1/23/2024	JSY	Emails re prior communications re stipulation re enforcement of FSP.	0.2	
1/23/2024	JSY	Emails re discovery briefs.	0.1	
1/23/2024	BBK	Emailing w/ RBGG team re Opposition to Motion to Compel Class List.	0.1	
1/23/2024	BBK	Analyzing Opposition to Motion to Compel Class List.	0.7	
1/23/2024	BBK	Meeting w/ AHS and JSY re plan for Reply ISO Motion to Compel Class List.	1.0	
1/23/2024	BBK	Emailing w/ co-counsel re Ds' Opp to Motion to Compel Class List and drafting Reply ISO same (including reviewing cases relied upon by Ds).	0.3	
1/23/2024	BBK	Emailing w/ G. Wallace re analysis of 30(b)(6) testimony to determine which topics to move to compel adequate testimony on.	0.1	
1/23/2024	BBK	Reviewing AX report on comm'ns w/ M. Johnson re plan for letter brief re potential discovery dispute over data necessary for staffing expert analysis.	0.1	
1/23/2024	BBK	Emailing w/ JSY and AHS re Ds' proposed stipulation in lieu of producing docs relating to Fleet Safety Policy.	0.1	
1/23/2024	BBK	Reviewing Ds' portions of letter briefs re: additional depositions, ESI/docs relating to Fleet Safety Policy, and inspection of Brookhurst facility.	0.3	
1/23/2024	BBK	Brainstorming revisions to Pls' section of letter brief on additional depositions.	0.2	
1/23/2024	BBK	Emails w/ RBGG team and co-counsel re: plan for responding to Ds' joint letter briefs and other discovery disputes and meeting re: same on 1/24.	0.2	
1/23/2024	BBK	Reviewing M. Johnson - E. Rutner emails re Ds' delays in sharing positions on outstanding discovery disputes and potential need to file motions to compel after 2/8.	0.1	
1/23/2024	BBK	Reviewing G Wallace comments and redlines on draft supplemental interrogatory responses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/23/2024	BBK	Analyzing CACI jury instructions re statutory damages under Unruh Act and reporting on same to team.	0.4	
1/23/2024	AHS	Read and excerpted portions of motion to compel briefing for reply ISO mot to compel.	2.1	
1/23/2024	AHS	Call w JY and BBK re: mot to compel reply.	0.5	
1/23/2024	AHS	Continued call w just BBK re: mot to compel reply.	0.5	
1/23/2024	AHS	Drafted outline for reply to mot to compel.	1.0	
1/23/2024	AHS	Legal research for reply ISO mot to compel.	2.4	
1/23/2024	AX	Emails with MJ re letter brief for supplemental data for staffing expert analysis; review of materials.	1.0	
1/23/2024	DLE	Save and circulate recent filings and supporting pleadings.	0.8	
1/24/2024	GCG	Participate in team meeting w/ SW and BU to discuss revisions to discovery letter briefs.	1.0	
1/24/2024	GCG	Review defendants' portion of letter briefs and ER email re document production.	0.2	
1/24/2024	GCG	Conf w/ JSY re discovery issues.	0.1	
1/24/2024	GCG	Conf w/ KES and email to MJ and team re motion to seal in support of Benchmark motion to compel.	0.1	
1/24/2024	JSY	Review defs' sections of letter briefs.	0.5	
1/24/2024	JSY	Team meeting.	0.8	
1/24/2024	JSY	Conf. w/ GCG and AS re follow up tasks from team meeting.	0.2	
1/24/2024	BBK	Reviewing E. Rutner email to Pls re status of outstanding docs that Ds' agreed to produce and confirming impasses.	0.1	
1/24/2024	BBK	Reviewing G. Wallace email to co-counsel re initial thoughts on addressing Ds' positions in opposition to MTC Class List and three letter briefs.	0.1	
1/24/2024	BBK	Preparing for co-counsel meeting re responding to Ds' positions in MTC and letter briefs.	0.3	
1/24/2024	BBK	Meeting w/ co-counsel re responding to Ds' positions in MTC and letter briefs.	0.8	
1/24/2024	BBK	Reviewing AX report re TC w/ B. Jestrabek-Hart re Scotts Valley EDs.	0.1	
1/24/2024	AHS	Outline reply ISO mot to compel.	0.6	
1/24/2024	AHS	Worked on drafting reply ISO mot to compel.	5.7	
1/24/2024	AHS	Meeting with co-counsel re reply ISO mot to compel and other discovery issues.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/24/2024	AHS	Talked to JY re plan for updating the case tasks list.	0.1	
1/24/2024	AX	Call with Bernie Jestrabek-Hart and update notes re same.	0.5	
1/24/2024	AX	Email to team re tenure of Scotts Valley EDs.	0.5	
1/24/2024	AX	Meeting with Brookdale cocounsel re outstanding discovery issues.	0.5	
1/24/2024	AX	Review materials to draft letter to Sen. Casey; related emails to KES re public versions of briefs.	0.7	
1/24/2024	AX	Call with BJH re Scotts Valley EDs; email to team re analysis of same.	1.0	
1/24/2024	KES	Gather class cert materials and upload to Sharefile for Sen. Casey.	0.7	
1/25/2024	GCG	Emails to GW and team re letter brief searching additional depositions.	0.2	
1/25/2024	JSY	Emails re arbitration opt out list.	0.1	
1/25/2024	JSY	Conf. w/ KES re transportation for class reps to hearing.	0.1	
1/25/2024	JSY	Emails re transportation and re sealing issues.	0.3	
1/25/2024	JSY	Emails re letter briefs.	0.1	
1/25/2024	BBK	Reviewing/responding to AHS questions for Reply ISO Motion to Compel Class List.	0.5	
1/25/2024	BBK	Emails w/ co-counsel re sealing motion for Motion to Compel Staffing Formula.	0.1	
1/25/2024	BBK	Emailing w/ KES re accessible transportation for B Jestrabek-Hart and P Lindstrom to 2/1 hearing.	0.1	
1/25/2024	BBK	Revising Pls' section of letter brief re additional depositions IRT Ds' section.	1.3	
1/25/2024	BBK	Emailing w/ co-counsel re revisions to Pls' section of letter brief re additional depositions.	0.2	
1/25/2024	BBK	Drafting further revisions to Pls' section of letter brief re additional depositions based on co-counsel comments.	0.5	
1/25/2024	BBK	Revising Pls' section of letter brief re docs and ESI re Fleet Safety Policy IRT Ds' section of same.	2.2	
1/25/2024	BBK	Reviewing E. Rutner email re Ds' changed position and plan to revise their section of joint letter brief re ESI and docs on Fleet Safety Policy; reporting to co-counsel and team re import of same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 789

SERVICES

Date	Person	Description of Services	Hours	Discount
1/25/2024	BBK	Reviewing Court's Order on omnibus sealing motion of docs filed w/ Motion for Leave briefing; conferring w/ RBGG team re next steps to comply w/ same.	0.2	
1/25/2024	BBK	Emailing w/ co-counsel re sending revised letter briefs on additional depos and Brookhurst inspections to Defendants.	0.1	
1/25/2024	AHS	Email catchup.	0.4	
1/25/2024	AHS	Worked on Reply ISO Mot to Compel.	7.5	
1/25/2024	AX	Draft letter to Sen. Casey and review documents re same.	1.7	
1/25/2024	AX	Watch senate hearing and draft notes to team re same.	1.7	
1/25/2024	AX	Email to opposing counsel re letter brief re interrogatory limits.	0.1	
1/25/2024	KES	Review order re omnibus motion to seal, review Defs' redacted materials and emails with team re need to prepare redacted versions.	0.7	
1/25/2024	KES	Online research a telephone calls re alternative WAV transportation arrangements for clients following issue with initial booking.	2.7	
1/26/2024	GCG	Meet w/ SW, RBGG team and BU to discuss letter briefs and plan for moot.	0.7	
1/26/2024	GCG	Follow up meeting w/ RBGG team re same.	0.2	
1/26/2024	GCG	Conf w/ JSY re plan for oral argument and reply brief due Monday.	0.1	
1/26/2024	JSY	Emails re outreach to potential witness.	0.1	
1/26/2024	JSY	Review notes from team meeting; conf. w/ GCG re same.	0.2	
1/26/2024	JSY	Edit Reply ISO motion to compel class list; conf. w/ BBK re same.	1.7	
1/26/2024	JSY	Emails re transportation to hearing for clients.	0.1	
1/26/2024	BBK	Reviewing AX report to RBGG team re hearing of Senate Committee on Aging re problems w/ assisted living facility staffing.	0.1	
1/26/2024	BBK	Phone call w/ AX re joint letter briefs and accessible transportation for clients to 2/1 hearing.	0.3	
1/26/2024	BBK	Reviewing G. Wallace email re analysis of 30(b)(6) testimony for evaluating which Topics to move to compel further testimony on.	0.1	
1/26/2024	BBK	Revising/commenting on AHS draft Reply ISO Motion to Compel class list.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/26/2024	BBK	Reviewing Ds' revisions to letter briefs re: additional depositions, Brookhurst inspection, and ESI/docs re Fleet Safety Policy in prep for co-counsel meeting.	0.2	
1/26/2024	BBK	Co-counsel meeting re: motions/letter briefs re discovery disputes and RBGG team debrief following same.	0.8	
1/26/2024	BBK	Conferring w/ M. Johnson, G. Wallace and KES re finalizing, creating exhibits for, and filing letter brief re additional depositions.	0.4	
1/26/2024	BBK	Reviewing M. Johnson emails w/ opposing counsel re letter briefs.	0.1	
1/26/2024	BBK	Emails w/ team re: AX draft email to co-counsel re filing redacted versions of docs ISO motion for leave in compliance w/ Court's Omnibus Sealing Order.	0.1	
1/26/2024	BBK	Conferring w/ KES and Judge Beeler's chambers re courtesy copies of Motion to Compel.	0.2	
1/26/2024	BBK	Revisions to letter brief re ESI/docs on Fleet Safety Policy IRT Ds' revised portion of same.	0.7	
1/26/2024	BBK	Conferring w/ co-counsel re further revisions to same; sending revised brief to Ds.	0.2	
1/26/2024	BBK	Reviewing AX report re B. Jestrabek-Hart deposition testimony related to Fleet Safety Policy.	0.1	
1/26/2024	BBK	Comm'ns w/ KES re arranging accessible transportation for B. Jestrabrek-Hart and P. Lindstrom to 2/1 hearing.	0.1	
1/26/2024	BBK	Meeting w/ AX, G. Wallace, M. Johnson and R. Steyer re letter brief to compel additional 30(b)(6) testimony.	0.8	
1/26/2024	BBK	Phone call w/ JSY re further revisions to draft Reply ISO Motion to Compel Class List.	0.2	
1/26/2024	BBK	Emailing w/ JSY and AHS re further revisions to draft Reply ISO Motion to Compel Class List.	0.2	
1/26/2024	BBK	Reviewing AX's proposed questions for moot oral argument on motion for leave.	0.1	
1/26/2024	AHS	Reviewed BBK's comments and emailed BBK and JY re: next steps for revising reply ISO mot to compel.	0.3	
1/26/2024	AHS	Meeting with co-counsel.	0.4	
1/26/2024	AHS	Meeting with GCG, BBK, AX, DLE, KS.	0.4	
1/26/2024	AHS	Revisions to Brookdale reply ISO mot to compel based on BBK's comments.	1.9	
1/26/2024	AHS	Reviewed email re: named plaintiff BJH's mobility issues.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 791

SERVICES

Date	Person	Description of Services	Hours	Discount
1/26/2024	AHS	Reviewed draft letter brief re: compelling production of ESI related to FSP.	0.2	
1/26/2024	AHS	Reviewed JSY comments.	0.2	
1/26/2024	AX	Review briefs and draft questions for moot.	0.5	
1/26/2024	AX	Brookdale cocounsel team meeting.	0.8	
1/26/2024	AX	Brookdale meeting with cocounsel re letter brief to compel further 30b6 testimony.	0.8	
1/26/2024	AX	Email with Brookdale opposing counsel re omnibus motion to seal.	0.3	
1/26/2024	AX	Emails re BJH and mobility status with team; review of depositions and notes re same.	1.0	
1/26/2024	AX	Review team correspondence re discovery issues.	0.5	
1/26/2024	AX	Review of analysis of 30b6 testimony and RFAs.	0.5	
1/26/2024	AX	Emails with team re transportation for BJH and PL to hearing.	0.1	
1/26/2024	KES	(Billing Judgment) Finalize transportation arrangements for clients in Scotts Valley to attend hearing and email to clients re same.	0.0	0.6
1/26/2024	KES	Zoom meeting with co-counsel re discovery motions and pending hearing.	0.8	
1/26/2024	KES	(Billing Judgment) Research Oakland courthouse accessibility for client in wheelchair.	0.0	0.3
1/26/2024	KES	Update chart of depo summary status.	1.0	
1/26/2024	KES	Emails with team re filing redacted docs per omnibus sealing order.	0.2	
1/26/2024	KES	Email with BBK re Beeler chambers copy.	0.1	
1/26/2024	KES	Prepare exhibits for disco letter brief re depositions.	0.5	
1/26/2024	KES	Download and circulate filed discovery letter briefs and follow up re incorrect exhibits.	0.4	
1/26/2024	DLE	Attend and note-take weekly co-counsel meeting to discuss case tasks; attend and note-take firm-only debrief.	0.8	
1/26/2024	DLE	Finalize and circulate notes from weekly meeting and firm-only debrief.	0.4	
1/27/2024	GCG	Review and analyze motion for leave in preparation for moot of oral argument.	1.5	
1/27/2024	GCG	Email JSY re Algarme status.	0.1	
1/27/2024	AHS	Reviewed BBK and JY edits to Reply ISO mot to compel.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 792

SERVICES

Date	Person	Description of Services	Hours	Discount
1/28/2024	GCG	Review and analyze defendants' opposition to motion for leave to prepare for moot.	1.0	
1/28/2024	GCG	Emails GW and MJ re moot.	0.1	
1/28/2024	GCG	Emails to JSY and RBGG team re revisions to reply brief.	0.3	
1/28/2024	JSY	Emails re JA status.	0.1	
1/28/2024	JSY	Emails and conf re Reply ISO motion to compel class list.	0.3	
1/28/2024	JSY	Emails re moot of argument.	0.1	
1/28/2024	BBK	Emailing w/ AHS and JSY re drafting insert responding to Ds' arguments re: Pls' legal authority for Reply ISO Motion to Compel.	0.2	
1/28/2024	BBK	Revising AHS draft Reply ISO Motion to Compel Class List.	6.0	
1/28/2024	BBK	Emailing RBGG team and co-counsel re draft Reply ISO Motion to Compel and additions needed for same.	0.2	
1/28/2024	AHS	Incorporated JY and BBK's edits to Reply ISO mot to compel and made additional revisions.	5.8	
1/28/2024	AHS	Emails re: reply.	0.5	
1/28/2024	AX	Review team emails re hearing and hearing prep.	0.3	
1/29/2024	GCG	Review plaintiffs reply to prepare for moot.	0.6	
1/29/2024	GCG	Conf w/ JSY and emails to team re sealing, preparation for moot and reply brief revisions.	0.3	
1/29/2024	GCG	Research re potential expert on transfer danger for class claims.	0.3	
1/29/2024	GCG	Conf w/ JSY re same.	0.1	
1/29/2024	GCG	Email to AX re same.	0.1	
1/29/2024	JSY	Conf. w/ GCG re hearing prep and Reply.	0.2	
1/29/2024	JSY	Comms' re JA.	0.2	
1/29/2024	JSY	Emails re incorrect document filed by Defs.	0.1	
1/29/2024	JSY	Emails re potential experts.	0.1	
1/29/2024	JSY	Emails re discovery stipulation.	0.1	
1/29/2024	JSY	Edit Reply ISO motion for class list; multiple emails and conf. re same.	1.8	
1/29/2024	JSY	Further conf. and emails re Reply ISO Motion to compel class list; review edits to same.	0.7	
1/29/2024	JSY	Emails re letter briefs.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/29/2024	MWB	Emails re experts and conf w/ GCG.	0.5	
1/29/2024	BBK	Reviewing email from opposing counsel re complying w/ Omnibus Sealing Order; conferring w/ team re addressing same.	0.1	
1/29/2024	BBK	Conferring w/ JSY and co-counsel re responding to Ds' request for deposition of R. Stiner and for supp interrogatory responses from named Pls.	0.3	
1/29/2024	BBK	Reviewing emails w/ Defendants re revisions to joint letter briefs and Ds' supp doc production.	0.1	
1/29/2024	BBK	Emailing re: identifying expert re safety issues raised by FSP.	0.1	
1/29/2024	BBK	Reviewing/commenting on AX draft revisions to letter brief re interrogatory responses IRT Ds' section of same.	0.2	
1/29/2024	BBK	Emailing w/ JSY re requesting that Ds' file correct emails re; Ds' proposed stipulation w/ their Opposition to Motion to Compel Class List; drafting email and conferring w/ Ds re same.	0.3	
1/29/2024	BBK	Phone call w/ JSY re finalizing and filing Reply ISO Motion to Compel.	0.2	
1/29/2024	BBK	Phone call w/ JSY and AHS re finalizing and filing Reply ISO Motion to Compel.	0.3	
1/29/2024	BBK	Edit Reply ISO Motion to Compel.	0.2	
1/29/2024	BBK	Identifying 30(b)(6) testimony re: personal assessment data for Reply ISO Motion to Compel; drafting insert for Reply re same.	0.8	
1/29/2024	BBK	Analyzing/incorporating AHS insert for and JSY revisions to Reply ISO Motion to Compel.	0.3	
1/29/2024	BBK	Conferring w/ co-counsel re proposed revisions and additions to Reply ISO Motion to Compel.	0.2	
1/29/2024	BBK	Conferring w/ JSY, T. Close and R. Steyer re edits to Reply ISO Motion to Compel.	0.2	
1/29/2024	BBK	Conducting record cite check and additional revisions for Reply ISO Motion to Compel.	1.0	
1/29/2024	BBK	Emailing w/ JSY and AHS re additional revisions to Reply ISO Motion to Compel.	0.4	
1/29/2024	BBK	Emailing w/ AHS re Reply.	0.2	
1/29/2024	BBK	Conferring w/ KES re filing Reply ISO Motion to Compel.	0.1	
1/29/2024	BBK	Analyzing Ds' further revisions to ltr brief on Fleet Safety Policy ESI/docs.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/29/2024	BBK	Emailing w/ co-counsel re plan for responding to Ds' further revisions to ltr brief on Fleet Safety Policy ESI/docs.	0.2	
1/29/2024	BBK	Drafting further revisions to ltr brief on Fleet Safety Policy ESI/docs IRT Ds' revised section.	0.6	
1/29/2024	AHS	Worked on insert for Reply ISO mot to compel that responds to def's attack on our cases.	2.4	
1/29/2024	AHS	Call with JY and BBK re Reply.	0.3	
1/29/2024	AHS	Emails re reply and other case issues.	0.3	
1/29/2024	AHS	Reviewed JY's edits and BBK's clean version of the Reply.	0.9	
1/29/2024	AHS	Edit Reply ISO mot to compel.	0.9	
1/29/2024	AHS	Final proofread of reply iso of mot to compel.	0.3	
1/29/2024	AX	Review materials re FSP expert.	0.4	
1/29/2024	AX	Emails re filing docs in accordance with omnibus sealing motion order.	0.5	
1/29/2024	AX	Legal research and revise letter brief re interrogatory limits.	2.5	
1/29/2024	AX	Review transcripts and notes to draft letter brief to compel further 30b6 testimony.	1.8	
1/29/2024	KES	Efile reply re MTC.	0.2	
1/29/2024	KES	Download and circuate pleading.	0.1	
1/29/2024	KES	Online and Westlaw research re potential experts.	0.9	
1/29/2024	KES	Begin comparison of Wallace declaration as marked for redaction with court order and email team re discrepancies.	2.8	
1/30/2024	GCG	Prepare for and conduct moot oral argument w/ GW, MJ, BU and JSY.	2.0	
1/30/2024	GCG	Research and draft comments on argument for GW.	0.6	
1/30/2024	GCG	Conf w/ JSY re same.	0.2	
1/30/2024	GCG	Conf w/ and emails to AX re sealing issues, SEnate hearing, plaintiff chart for use at oral argument and search for expert on transfer.	0.2	
1/30/2024	GCG	Conf w/ and emails to KES re oral argument and sealing project.	0.2	
1/30/2024	GCG	Revise letter to Senator Casey.	0.2	
1/30/2024	GCG	Email to AX and team re call from putative class member.	0.1	
1/30/2024	JSY	Emails and conf. re various motions to compel and discovery issues.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/30/2024	JSY	Emails re letter to Senator Casey.	0.1	
1/30/2024	JSY	Attend moot of oral argument.	1.0	
1/30/2024	JSY	Emails re task list.	0.2	
1/30/2024	JSY	Prep for moot.	1.0	
1/30/2024	JSY	Multiple conf. re hearing on motion for leave and other case priorities.	0.7	
1/30/2024	JSY	Edit memo with feedback re moot.	0.4	
1/30/2024	JSY	Emails re sealing issues.	0.1	
1/30/2024	BBK	Drafting further revisions to letter brief re Fleet Safety Policy documents and ESI.	0.5	
1/30/2024	BBK	Conferring w/ co-counsel re further revisions to letter brief re Fleet Safety Policy documents and ESI.	0.2	
1/30/2024	BBK	Finalizing/sending revised letter brief re Fleet Safety Policy documents and ESI to Ds.	0.2	
1/30/2024	BBK	Analyzing Ds' further revisions to letter brief re Fleet Safety Policy docs IRT our 1/30 revisions, and drafting further revisions to same.	0.7	
1/30/2024	BBK	Emailing w/ co-counsel re further revisions to letter brief on FSP docs/ESI.	0.1	
1/30/2024	BBK	Preparing assignment for and conferring w/ DE re preparing exhibits for letter brief on FSP docs/ESI; reviewing/revising same.	0.4	
1/30/2024	BBK	Reviewing emails w/ opposing counsel re missing staffing data from Ds' supp productions.	0.1	
1/30/2024	BBK	Meeting w/ JSY re motions and letter briefs re discovery disputes and prep for hearing on motion for leave.	0.3	
1/30/2024	BBK	Emailing w/ co-counsel re AX revisions to draft letter brief on interrogatories.	0.1	
1/30/2024	BBK	Conferring w/ KES re logistics for client attendance at motion for leave hearing.	0.2	
1/30/2024	BBK	Conferring w/ JSY and AX re moot OA for motion for leave hearing.	0.1	
1/30/2024	BBK	Drafting updated case to do list tracking key dates and status of all discovery motions.	0.6	
1/30/2024	BBK	Analyzing and responding to T. Close report re regulatory history of rule prohibiting mandatory transfers from wheelchairs in transportation vehicles.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/30/2024	BBK	Analyzing and reporting to team additional regulations identified by T. Close re minimum size of vehicles for coverage by DOT regulations.	0.7	
1/30/2024	BBK	Conferring w/ RBGG team re meeting B. Jestrabek-Hart and P. Lindstrom in advance of hearing on motion for leave.	0.1	
1/30/2024	BBK	Conferring w/ RBGG team re preparing.filing redacted docs in support of Motion for Leave pursuant to omnibus sealing order.	0.1	
1/30/2024	AHS	Reviewed emails re discovery disputes.	0.2	
1/30/2024	AHS	Conversation with JY going over feedback from process of drafting/revising Reply ISO Mot to Compel.	0.5	
1/30/2024	AHS	Reviewed internal task list.	0.6	
1/30/2024	AX	Emails with opposing counsel re filing redacted documents.	0.3	
1/30/2024	AX	Emails re moot.	0.2	
1/30/2024	AX	Call with GCG re letter to Sen. Casey, hearing prep, and other case tasks.	0.2	
1/30/2024	AX	Emails re intake.	0.1	
1/30/2024	AX	Revise letter brief re interrogatory limits and cite check; emails with team and opposing counsel.	1.3	
1/30/2024	AX	Emails re sealing.	0.2	
1/30/2024	KES	Continue review of order and marked redactions and compile redacted version of Wallace Exs 1-68 and expert declarations.	5.3	
1/30/2024	DLE	Compile and prepare exhibit A and B for letter brief.	2.1	
1/31/2024	GCG	Prepare for hearing on motion for leave.	0.3	
1/31/2024	GCG	Confs w/ and email to key witnesses re attendance.	0.4	
1/31/2024	GCG	Emails to JSY and team re plan for clients and attendance at hearing.	0.3	
1/31/2024	GCG	Review AX notes on Senate hearing.	0.1	
1/31/2024	GCG	Emails to BBK and team re letter brief revisions.	0.1	
1/31/2024	JSY	Emails re sealing issues.	0.1	
1/31/2024	JSY	Edit case task list; emails re same.	0.4	
1/31/2024	JSY	Emails re sealing issues.	0.1	
1/31/2024	BBK	Reviewing GCG-GW emails re strategy for oral argument on Motion for Leave.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/31/2024	BBK	Reviewing co-counsel emails w/ Ds re missing data related to staffing analysis from Ds' supp production.	0.1	
1/31/2024	BBK	Emailing w/ co-counsel re further revisions to letter brief re Fleet Safety Policy ESI/docs.	0.1	
1/31/2024	BBK	Finalizing/sending to Ds revised letter brief re Fleet Safety Policy ESI/docs.	0.4	
1/31/2024	BBK	Emails w/ RBGG team re redactions to docs filed under seal w/ Motion for Leave to comply w/ Omnibus Sealing Order and re filing same.	0.1	
1/31/2024	BBK	Emails w/ RBGG team and co-counsel re materials to assist with hearing prep for Motion for Leave.	0.1	
1/31/2024	BBK	Conferring w/ KES and JSY re plan for hearing.	0.1	
1/31/2024	BBK	Phone call w/ P Lindstrom re hearing on Motion for Leave.	0.5	
1/31/2024	BBK	Emails w/ P Lindstrom after phone call.	0.2	
1/31/2024	BBK	Conferring w/ JSY and AHS re update to case to-do list; reviewing AHS update to same.	0.2	
1/31/2024	BBK	Emailing w/ RBGG team re logistics for hearing.	0.1	
1/31/2024	BBK	Reviewing B. Umpierre letter brief sent to Ds seeking date certain for Ds to complete production of staffing data.	0.1	
1/31/2024	AHS	Review emails re status.	0.2	
1/31/2024	AHS	Reviewed emails re discovery and current status of disputes.	0.6	
1/31/2024	AHS	Updated internal task list.	1.3	
1/31/2024	AHS	Talked to KS re: logistics for getting clients to courthouse.	0.3	
1/31/2024	AHS	Revised case tasks list pursuant to JY edits and sent to GCG.	0.5	
1/31/2024	AHS	Confer w/ DLE re hearing tomorrow.	0.2	
1/31/2024	AX	Review class rep declarations and Motion for Leave; update and revise chart re named plaintiffs and putative plaintiffs for hearing prep.	1.0	
1/31/2024	AX	Emails re filing redacted documents in accordance with omnibus motion to seal and order granting.	0.4	
1/31/2024	AX	Draft notice re filing redacted documents and related review of docket.	0.7	
1/31/2024	AX	Call with Bernie Jestrabek-Hart re hearing; related email to team.	0.5	
1/31/2024	AX	Call intake.	0.1	
1/31/2024	AX	Review redacted documents.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/31/2024	KES	Follow up logistics for client transportation and meetup at hearing.	0.6	
1/31/2024	KES	Complete redacted versions of declarations and exhibits per omnibus sealing motion.	2.3	
2/1/2024	GCG	Prepare for hearing on motion for leave.	0.5	
2/1/2024	GCG	(Reduced Charge) Travel to hearing and meeting w/ co-counsel, clients and witnesses.	0.5	0.5
2/1/2024	GCG	Email to AX and team re Senate Comm. hearing on assisted living.	0.2	
2/1/2024	GCG	Confs w/ MWB and JSY re oral argument follow up.	0.2	
2/1/2024	GCG	Participate in hearing and meeting w/ co-counsel, clients and witnesses.	2.0	
2/1/2024	JSY	Conf. w/ BBK and GCG re hearing.	0.2	
2/1/2024	JSY	Review and edit letter brief re resident files for happy camper declarants.	0.4	
2/1/2024	JSY	(Reduced Charge) Travel to and from hearing re motion for leave.	0.5	0.5
2/1/2024	JSY	Conf. w/ GCG re hearing.	0.1	
2/1/2024	JSY	Attend hearing re motion for leave.	2.2	
2/1/2024	BBK	Analyzing Ds' further revisions to letter brief re Fleet Safety Policy docs and making recommendation to co-counsel re same.	0.2	
2/1/2024	BBK	Conferring w/ DE re finalizing exhibits for letter brief re Fleet Safety Policy docs.	0.1	
2/1/2024	BBK	Finalizing letter brief re Fleet Safety Policy docs and sending same w/ exhibits to Ds.	0.2	
2/1/2024	BBK	Conferring w/ JSY re R. Steyer draft letter brief seeking resident files of declarants.	0.1	
2/1/2024	BBK	Emailing w/ KES re updates re transportation to hearing for clients.	0.1	
2/1/2024	BBK	Emailing w/ RBGG team re hearing on motion for leave.	0.1	
2/1/2024	BBK	(Reduced Charge) Travel to/from hearing on Motion for Leave.	0.5	0.5
2/1/2024	BBK	Attending to finalizing/filing of letter brief re FSP docs (including comm'ns w/ KES re same.	0.2	
2/1/2024	BBK	Revising/commenting on M. Johnson draft letter brief re supplementation of docs and ESI.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 799

SERVICES

Date	Person	Description of Services	Hours	Discount
2/1/2024	BBK	Reviewing M. Johnson further revisions to letter brief re 30(b)(6) on transportation IRT Ds' portion.	0.1	
2/1/2024	BBK	Emailing w/ JSY and AX re strategy re moving to compel further 30(b)(6) testimony.	0.1	
2/1/2024	BBK	Reviewing AX draft letter to Senator Casey and Committee on Agent re lawsuit.	0.1	
2/1/2024	BBK	Attend hearing on Motion for Leave conferring w/ team and clients.	2.2	
2/1/2024	AHS	Emails re GCG decl regarding the scrivener's error declaration and the reply ISO mot to compel in advance of today's hearing.	0.2	
2/1/2024	AHS	Emails re: fleet safety policy joint letter brief.	0.2	
2/1/2024	AHS	(Billing Judgment) Work on case tasks list.	0.0	0.1
2/1/2024	AHS	Updated case tasks list based on circulation of new letter brief drafts.	0.3	
2/1/2024	AHS	Conf w/ KS re clients attendance at hearing.	0.2	
2/1/2024	AHS	Read pleadings re: mot for leave re: subclasses in advance of hearing.	1.0	
2/1/2024	AHS	(Reduced Charge) Traveled to courthouse for hearing.	0.2	0.3
2/1/2024	AHS	Attend hearing on motion for leave to move for subclass certification.	1.0	
2/1/2024	AHS	Debriefed with clients and co-counsel team after hearing.	0.6	
2/1/2024	AHS	(Reduced Charge) Traveled back to office with JY, BBK, KS, DLE.	0.2	0.2
2/1/2024	AHS	Conf. w/ client and co-counsel before hearing.	1.1	
2/1/2024	AX	Review all 30b6 deposition transcripts, memos identifying excerpts from RS and GW re potential letter brief on compelling additional testimony; email correspondence with team re same; draft memo re same.	6.2	
2/1/2024	AX	Emails re filing notice in accordance with order granting omnibus motion to seal.	0.2	
2/1/2024	KES	Telephone calls, emails and texts re logistics for client pickup for hearing.	1.3	
2/1/2024	KES	(Billing Judgment) Travel to/from Oakland courthouse to meet clients and attend hearing on motion for certification of subclasses.	0.0	3.5
2/1/2024	KES	Finalize and efile joint discovery letter brief re fleet safety policies.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/1/2024	DLE	Finalize and save Exhibits A and B for letter brief on fleet safety policy docs.	0.2	
2/1/2024	DLE	(Billing Judgment) Travel to court and attend hearing on motion to certify subclasses.	0.0	3.3
2/1/2024	DLE	Locate, summarize, and circulate recording of congressional hearing on assisted living facilities.	0.4	
2/2/2024	GCG	Emails to BBK, GW and team re letter brief issues.	0.1	
2/2/2024	JSY	Team meeting, including meeting with RBGG team.	0.9	
2/2/2024	BBK	Reviewing AX report to co-counsel re whether to move to compel further 30(b)(6) testimony and GW responses thereto.	0.1	
2/2/2024	BBK	Reviewing emails w/ opposing counsel re exchanges of letter briefs and supp discovery production.	0.2	
2/2/2024	BBK	Conferring w/ co-counsel re meeting and conferring on production of resident files for happy camper declarants.	0.1	
2/2/2024	BBK	Reviewing emails w/ opposing counsel re deposition of R. Stiner.	0.1	
2/2/2024	BBK	Meeting w/ co-counsel re case priorities and post-meeting debrief w/ RBGG team.	0.9	
2/2/2024	BBK	Reviewing AHS updated case task list; reviewing AHS follow-up w/ T. Close re PRA requests to paratransit orgs.	0.1	
2/2/2024	AHS	Updated internal task list before co-counsel meeting and circulated internally.	0.5	
2/2/2024	AHS	Weekly meeting with co-counsel discussing status of discovery letter briefs and motions to compel, and next steps.	0.5	
2/2/2024	AHS	Internal call with BBK JY AX KS DLE to discuss tasks on RBGG's plate and upcoming discovery deadlines.	0.4	
2/2/2024	AHS	Updated case tasks list based on meeting with co-counsel and internal team meeting, and circulated new version internally.	0.1	
2/2/2024	AHS	Emailed co-counsel to check in on status of PRA requests.	0.1	
2/2/2024	AX	Email correspondence with KES re exhibits for interrogatories leter brief.	0.3	
2/2/2024	AX	Analysis of deposition testimony; email summarizing analysis re potential letter brief compelling further 30b6 testimony.	1.5	
2/2/2024	AX	Meeting with Brookdale cocounsel and internal RBGG team re case tasks.	1.0	
2/2/2024	AX	Correspondence with KS re notice re filing docs in accordance with omnibus motion to seal.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 801

SERVICES

Date	Person	Description of Services	Hours	Discount
2/2/2024	AX	Review correspondence from opposing counsel re letter brief process.	0.1	
2/2/2024	KES	Prepare exhibits for discovery letter brief re interrogatories.	0.8	
2/2/2024	KES	Review, finalize and efile redacted versions of motion for leave to file motion for certification of subclasses following entry of omnibus sealing motion; download and organize filed pleadings.	3.0	
2/2/2024	DLE	Attend and note-take weekly co-counsel meeting to discuss case tasks.	0.5	
2/2/2024	DLE	Attend and note-take firm-only debrief.	0.4	
2/2/2024	DLE	Finalize and circulate notes from co-counsel meeting and firm-only debrief.	0.2	
2/4/2024	JSY	Review discovery orders; emails re same.	0.3	
2/5/2024	GCG	Conf w/ JSY and emails to MJ and team re motions to compel and letter briefs.	0.2	
2/5/2024	JSY	Calls and emails re follow up from discovery orders.	0.5	
2/5/2024	BBK	Reviewing Court's 2/4 discovery orders; conferring w/ JSY re complying w/ same.	0.2	
2/5/2024	BBK	Reviewing M. Johnson emails w/ opposing counsel re discovery disputes.	0.2	
2/5/2024	BBK	Reviewing R. Steyer email to opposing counsel memorializing meet and confer on resident files and J. Bertino response to same.	0.1	
2/5/2024	BBK	Reviewing T. Close report re PRA requests to transit organizations.	0.1	
2/5/2024	BBK	Emailing w/ team re addressing Court's discovery orders.	0.1	
2/5/2024	BBK	Emailing w/ team and opposing counsel re meeting and conferring per Court's discovery orders.	0.2	
2/5/2024	BBK	Emailing w/ co-counsel re responding to Ds re intent to seek clarification/reconsideration of MJ Beeler's order re additional depositions.	0.1	
2/5/2024	AHS	Reviewed Judge Beeler's orders re: discovery filings and correspondence with co-counsel regarding next steps for discovery disputes.	0.4	
2/5/2024	AX	Revise interrogatories letter brief.	1.2	
2/5/2024	DLE	Confer with AX re cutting exhibits from senate hearing letter.	0.2	
2/5/2024	DLE	Save and circulate recently filed pleadings.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/6/2024	GCG	Conf w/ BBK and JSY re discovery orders and meet and confer.	0.4	
2/6/2024	GCG	Review AS summary of team meeting.	0.1	
2/6/2024	JSY	Emails re discovery disputes and motions to compel.	0.2	
2/6/2024	JSY	Attend part of team meeting re discovery issues.	0.5	
2/6/2024	JSY	Conf. w/ BBK and GCG re discovery disputes.	0.5	
2/6/2024	BBK	Emails w/ opposing counsel re hearing on motion to compel and meet and confer on discovery disputes.	0.1	
2/6/2024	BBK	Prepare motion to Compel docs/ESI relating to Fleet Safety Policy and supporting pleadings.	0.1	
2/6/2024	BBK	Drafting report to RBGG team re issues to resolve and proposals for co-counsel meeting to plan for meet and confer w/ Ds on discovery disputes; conferring w/ JSY re same.	0.4	
2/6/2024	BBK	Reviewing AHS updated case task list in advance of co-counsel meeting.	0.1	
2/6/2024	BBK	Meeting w/ co-counsel re plan for 2/7 meet and confer w/ Ds re all discovery disputes.	1.5	
2/6/2024	BBK	Analyzing doc requests re: Fleet Safety Policy and preparing compromise proposal in advance of co-counsel meeting.	0.6	
2/6/2024	BBK	Drafting/sending revised compromise proposal re FSP docs to co-counsel in light of discussion at co-counsel meeting.	0.4	
2/6/2024	BBK	Conferring w/ RBGG team re drafting opposition to Ds' motion for leave to file motion for reconsideration of discovery order re depositions.	0.1	
2/6/2024	BBK	Phone call w/ JSY and GCG re discovery motions, hearing on motion to compel class list, and meet and confer w/ Ds re discovery disputes.	0.5	
2/6/2024	BBK	Reviewing/revising AHS report re takeaways and decisions from meeting w/ co-counsel.	1.0	
2/6/2024	AHS	Reviewed recent discovery filings and updated case tasks list.	0.9	
2/6/2024	AHS	Meeting with co-counsel discussing discovery dispute status and planning for tomorrow's M&C.	1.5	
2/6/2024	AHS	Consolidated takeaways from co-counsel meeting and circulated internally.	0.7	
2/6/2024	AX	Brookdale team meeting re discovery issues and case issues.	1.2	
2/6/2024	AX	Email with cocounsel re motion to compel staffing data.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/6/2024	DLE	Partial attendance of team plus co-counsel meeting to discuss case tasks.	0.6	
2/6/2024	DLE	Finalize and circulate notes from team meeting.	0.2	
2/6/2024	DLE	Save and circulate recently filed pleadings to team.	0.3	
2/7/2024	GCG	Review and analyze court order allowing motion to certify 6 classes.	0.2	
2/7/2024	GCG	Email to MH re same.	0.1	
2/7/2024	GCG	Confs w/ and emails to JSY re same and re preparing motion.	0.5	
2/7/2024	GCG	Meet w/ co-counseling team to plan Feb 9 filing and follow up on discovery meet and confer.	1.0	
2/7/2024	GCG	Conf w/ KES re sealing motion to certify.	0.1	
2/7/2024	JSY	Review order re motion for leave; emails re same.	0.7	
2/7/2024	JSY	Two conf. w/ GCG re order re motion for leave.	0.2	
2/7/2024	JSY	Emails re motion for certification of subclasses.	0.2	
2/7/2024	JSY	Prepare documents for motion for cert of subclasses; emails re same.	1.1	
2/7/2024	JSY	Prepare sealing pleadings.	0.5	
2/7/2024	JSY	Emails and messages re status of discovery issues.	0.2	
2/7/2024	JSY	Team meeting.	1.0	
2/7/2024	JSY	Edit GBW declaration; emails re same.	0.5	
2/7/2024	MWB	(Billing Judgment) Conference with BBK re court order, strategy & developments.	0.0	0.5
2/7/2024	MWB	Review order.	0.1	
2/7/2024	BBK	Reviewing Court Order denying Ds' motion for leave to file motion for reconsideration of order re additional depositions and order re-setting 2/15 discovery hearing to Zoom only.	0.1	
2/7/2024	BBK	Conferring w/ co-counsel re meeting to address order granting leave to file motion to certify facility-specific access subclasses.	0.1	
2/7/2024	BBK	Conferring w/ team re responding to Ds' request to postpone meet and confer on discovery disputes.	0.2	
2/7/2024	BBK	Analyzing Court Order granting leave to file motion to certify facility-specific access subclasses.	0.2	
2/7/2024	BBK	Comm'ns w/ RBGG team and co-counsel re preparing class cert motion and supporting pleadings.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2024	BBK	Attending to calendaring deadlines relating to motion to certify subclasses and CMC on 2/13.	0.1	
2/7/2024	BBK	Conferring w/ co-counsel re proposed compromises re docs and ESI relating to Fleet Safety Policy.	0.2	
2/7/2024	BBK	Conferring w/ JSY and AX re plan for meet and confer.	0.2	
2/7/2024	BBK	Drafting/sending final recommendation to co-counsel re proposed compromise on FSP docs.	0.2	
2/7/2024	BBK	Conferring w/ team re finalizing/filing Motion to Compel Benchmark Formula on 2/8 and sealing pleadings for same.	0.2	
2/7/2024	BBK	Meet and confer w/ Ds re discovery disputes.	0.5	
2/7/2024	BBK	Emailing w/ opposing counsel re Ds' request for supp discovery responses and deadline for motions to compel.	0.1	
2/7/2024	BBK	Reviewing T. Close and AX notes from meet and confer.	0.3	
2/7/2024	BBK	Meeting w/ co-counsel re plan for filing motion for class cert and debrief/next steps after meet and confer re discovery disputes.	1.0	
2/7/2024	AX	Emails with team re M&C and prep re same.	0.3	
2/7/2024	AX	Preparation for M&C, including reviewing letter briefs, notes from team meetings, emails, court orders.	0.8	
2/7/2024	AX	Review draft of Wallace declaration for motion to certify subclasses and draft comments.	0.7	
2/7/2024	AX	Meet and confer with Defs re various discovery disputes.	1.3	
2/7/2024	AX	Email to team re deadline for discovery disputes.	0.1	
2/7/2024	AX	Revise notes from M&C and email with analysis of next steps to team.	0.6	
2/7/2024	AX	Attend team meeting with cocounsel re motion to certify subclasses filing and various other case issues, including discovery disputes.	1.3	
2/7/2024	AX	Revise and cut letter brief re interrogatory limits to 2 pages per magistrate judge order.	0.5	
2/7/2024	AX	Update internal team to-do list.	0.3	
2/7/2024	AX	Correspondence with JSY re case tasks.	0.1	
2/7/2024	KES	Review emails re upcoming filings.	0.1	
2/7/2024	DLE	Calendar new deadlines per recent order.	0.2	
2/7/2024	DLE	Attend and note-take co-counsel meeting re upcoming filings and case tasks.	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2024	DLE	Begin finalizing notes from co-counsel meeting.	0.1	
2/8/2024	GCG	Confs w/ and emails to JSY and KES re motion to compel filing.	0.2	
2/8/2024	GCG	Meet w/ co-counsel team to plan motion for class cert filing.	0.4	
2/8/2024	JSY	Edit documents re class cert filing for access subclasses; emails re same.	1.2	
2/8/2024	JSY	Conf. w/ AX re issue with deposition dates.	0.1	
2/8/2024	JSY	Team meeting.	0.4	
2/8/2024	JSY	Edit documents re MTC staffing formula; multiple emails re same.	1.0	
2/8/2024	JSY	Draft and edit docs re motion for access barriers subclasses; emails re same; finalize and file same.	1.9	
2/8/2024	BBK	Reviewing AX's updated RBGG case task list after 2/7 co-counsel meeting.	0.1	
2/8/2024	BBK	Reviewing/commenting on AX updated letter brief re: Interrogatories to comply w/ 2/4 order re new process for letter briefs; reviewing M Johnson's proposed revisions to same.	0.2	
2/8/2024	BBK	Reviewing M. Johnson - J. Bertino emails re deadline for motions to compel and staffing data production.	0.1	
2/8/2024	BBK	Analyzing Local Rules and Standing Orders to ID any procedural requirements for class cert motion; conferring w/ JSY/AX re best hearing date and proposing same.	0.4	
2/8/2024	BBK	Conferring w/ RBGG team and co-counsel re preparing motion to compel benchmark formula and supporting pleadings and sealing motion.	0.5	
2/8/2024	BBK	Conferring w/ RBGG team and co-counsel re preparing motion for class cert and supporting pleadings and sealing motion.	0.5	
2/8/2024	BBK	Multiple meetings w/ KES re class cert order, preparing pleadings for MTC and motion for class cert.	0.8	
2/8/2024	BBK	Planning/preparing proposed counter-proposal to Ds re compromise on Fleet Safety Policy docs and ESI.	1.4	
2/8/2024	BBK	Reviewing AX recommendation re not filing notice to Court re depositions on 2/9.	0.1	
2/8/2024	BBK	Reviewing M. Johnson email proposing more detailed topics for 30(b)(6) depo on transportation.	0.1	
2/8/2024	BBK	Meeting w/ co-counsel re motion for class certification and motion to compel.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/8/2024	AX	Emails re interrogatory letter brief; make further revisions and send to Brookdale.	0.6	
2/8/2024	AX	Review deposition transcripts for executive directors and draft memo for motion to certify subclasses re same.	2.6	
2/8/2024	AX	Call with JSY re scheduling depositions.	0.2	
2/8/2024	AX	Email to team re scheduling depositions and case timing.	0.3	
2/8/2024	AX	Review team emails re motion to certify subclasses and related filings.	0.5	
2/8/2024	AX	Team meeting with cocounsel re motion for subclasses filing.	0.4	
2/8/2024	AX	Draft insert for motion for certification of subclasses.	1.0	
2/8/2024	KES	Review emails and orders re MTC and class cert filings.	0.2	
2/8/2024	KES	Zoom check-in with co-counsel re filings.	0.5	
2/8/2024	KES	Review and revise Wallace Declaration with updated exhibit numbers and review JY notes.	0.7	
2/8/2024	KES	Draft and revise Appendix A to admin motion to seal re Motion to Compel Staffing Formula.	1.3	
2/8/2024	KES	Prepare redacted and unredacted versions of Johnson Exhibits 1-42 in support of Motion to Compel Staffing Formula and revise, finalize, serve and efile Motion to Compel and related Admin Motion to Seal.	6.8	
2/8/2024	DLE	Finish finalizing and circulating notes from co-counsel meeting yesterday.	0.3	
2/8/2024	DLE	Save and circulate notes from recent meet and confer.	0.1	
2/8/2024	DLE	Attend and note-take co-counsel meeting re case tasks and upcoming filing.	0.4	
2/8/2024	DLE	Finalize and circulate notes from co-counsel meeting.	0.2	
2/9/2024	GCG	Confs w/ and email to JSY re Algarme declaration ISO class cert.	0.2	
2/9/2024	GCG	Emails to GW and team re status of filing and requested revision to brief.	0.2	
2/9/2024	GCG	Review and revise draft brief.	0.5	
2/9/2024	JSY	Edit and finalize documents re motion for certification of subclasses; multiple emails and conf. re same.	8.9	
2/9/2024	BBK	Reviewing Pls' Motion to Compel labor benchmark formula.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 807

SERVICES

Date	Person	Description of Services	Hours	Discount
2/9/2024	BBK	Emailing w/ RBGG team and co-counsel re opposing counsel's proposals re under seal docs for Motion to Compel and for Motion to Certify Subclasses.	0.1	
2/9/2024	BBK	Comm'ns w/ RBGG team and co-counsel re preparing class cert motion and supporting pleadings.	0.8	
2/9/2024	BBK	Meeting w/ JSY, AHS and AX re preparing class cert motion and supporting pleadings.	0.3	
2/9/2024	BBK	Conferring w/ co-counsel and RBGG team re obtaining Supplemental Algarme Declaration re standing.	0.2	
2/9/2024	BBK	Conducting record and legal cite-check and proposed revisions to class cert motion.	3.6	
2/9/2024	BBK	Meeting w/ co-counsel re preparing class cert motion and supporting pleadings.	0.4	
2/9/2024	BBK	Drafting counter-proposal to Ds re compromise over production of Fleet Safety Policy docs and eSI.	0.3	
2/9/2024	AHS	Edit of motion for leave to certify subclasses.	3.3	
2/9/2024	AHS	Discussed potential edits to motion for leave to certify subclasses with JY.	0.2	
2/9/2024	AHS	Meeting with co-counsel to discuss motion for subclass certification.	0.4	
2/9/2024	AHS	Call with JY and AX to discuss edits motion for subclass certification concerning Mastin Declaration.	0.2	
2/9/2024	AHS	Edited part of motion for subclass certification.	0.5	
2/9/2024	AX	Brookdale call with RBGG team re case tasks.	0.3	
2/9/2024	AX	Review correspondence re opposing counsel request to file omnibus motion to seal.	0.2	
2/9/2024	AX	Review Defs' revisions to interrogatory letter brief.	0.2	
2/9/2024	AX	Correspondence with team and opposing counsel re stipulation for omnibus motion to seal.	0.3	
2/9/2024	AX	Cite check of draft motion.	3.7	
2/9/2024	AX	Cite check of Waters and Mastins declarations.	2.4	
2/9/2024	AX	Emails and communications with team re filing.	0.4	
2/9/2024	KES	Download, circulate and organize filed motion for certification papers.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/9/2024	KES	Prepare redacted and unredacted version of Wallace exhibits in support of motion for certification of subclasses; prepare exhibits to expert declarations; review and finalize all motion papers and confer JY re same; serve under seal exhibits; efile all motion papers.	9.0	
2/9/2024	DLE	Save and circulate recently filed pleadings.	0.4	
2/9/2024	DLE	Attend and note-take co-counsel meeting re case tasks, upcoming filing.	0.4	
2/9/2024	DLE	Cross-reference and organize list of exhibits for upcoming filing, send to KES.	0.5	
2/9/2024	DLE	Finalize and circulate notes from co-counsel meeting.	0.2	
2/10/2024	JSY	Emails re subclass cert. motion.	0.1	
2/12/2024	GCG	Texts and emails w/ JSY and BBK re CMC.	0.1	
2/12/2024	GCG	Conf w/ JSY re motion for class cert filing.	0.1	
2/12/2024	GCG	Meet w/ GW, MJ, BU, JSY and BBK to plan CMC strategy.	0.7	
2/12/2024	GCG	Conf w/ BBK re plan for oral argument on motion to compel.	0.1	
2/12/2024	JSY	Emails re sealing stipulation.	0.1	
2/12/2024	JSY	Emails re meeting to prep for CMC.	0.1	
2/12/2024	JSY	Conf. w/ GCG re class cert filing.	0.1	
2/12/2024	JSY	Meeting to prep for CMC.	0.8	
2/12/2024	JSY	Conf. w/ BBK re case management issues.	0.2	
2/12/2024	BBK	Conferring w/ GCG re attending 2/13 CMC.	0.1	
2/12/2024	BBK	Assigning KES and DE to create binder to prep for hearing on Motion to Compel Class List.	0.1	
2/12/2024	BBK	Emails w/ RBGG team and co-counsel re responding to Ds' proposed stipulation re omnibus sealing motion on docs filed w/ Motion to Compel Benchmark Formula.	0.1	
2/12/2024	BBK	Reviewing/revising/commenting on M. Johnson's draft meet and confer letter re 30(b)(6) transportation deposition topics and ESI/docs re Fleet Safety Policy.	0.5	
2/12/2024	BBK	Meeting w/ GCG/JSY/GW/MJ/BU re plan for 2/13 CMC.	0.8	
2/12/2024	BBK	Meeting w/ GCG re hearing on MTC Class List.	0.1	
2/12/2024	BBK	Updating RBGG case task list; reporting to RBGG team re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/12/2024	BBK	Reviewing Ds' letter identifying time periods persons served as EDs and HWDs at Scotts Valley and San Ramon facilities; reviewing M. Johnson draft stip re briefing noticed motion to compel on dispute over supplementation of doc and ESI prods; reviewing AX report re intake w/ family member of former BD resident.	0.2	
2/12/2024	AHS	Reviewed status of case projects before tomorrow's CMC.	0.1	
2/12/2024	AX	Call with former Brookdale resident re possible complaint/claims and emails with team re same.	1.0	
2/12/2024	AX	Emails with team and opposing counsel re stipulation re sealing.	0.7	
2/12/2024	AX	Review MJ discovery letter to OC.	0.2	
2/12/2024	AX	Review correspondence from team re case tasks.	0.1	
2/12/2024	AX	Review BBK email re FSP docs and 30b6 issues.	0.2	
2/12/2024	AX	Review emails re check in for CMC.	0.1	
2/12/2024	KES	Update electronic pleadings files.	0.2	
2/12/2024	DLE	Gather materials online for binder for BBK re meet and confer.	1.3	
2/12/2024	DLE	Confer with KES re materials for BBK binder re meet and confer.	0.2	
2/13/2024	GCG	(Reduced Charge) Travel to conduct CMC.	0.2	0.3
2/13/2024	GCG	Meet w/ GW, MJ and BBK after CMC to plan reply.	0.2	
2/13/2024	GCG	Confs w/ GW and JSY re same.	0.4	
2/13/2024	GCG	Conf w/ AX re search for experts for transportation class and individual staffing claims.	0.2	
2/13/2024	GCG	Draft memo to file re CMC and plan for reply.	0.2	
2/13/2024	GCG	Conf w/ BBK re preparation for hearing on motion to compel.	0.1	
2/13/2024	GCG	Prepare and conduct CMC.	1.1	
2/13/2024	JSY	Emails re briefing schedule and CMC.	0.1	
2/13/2024	JSY	Multiple calls and emails re due date for Reply and stipulation to change.	0.5	
2/13/2024	BBK	Conferring w/ DE re preparing binder for hearing on motion to compel class list.	0.2	
2/13/2024	BBK	Reviewing emails w/ opposing counsel re: proposed stipulation re omnibus sealing motion.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/13/2024	BBK	Reviewing M. Johnson report re Ds' experts' prior inspections of the 4 facilities where named Pls reside/d that are still operated by BD.	0.1	
2/13/2024	BBK	Preparing for CMC.	0.2	
2/13/2024	BBK	Preparing for hearing on Motion to Compel Class List.	0.7	
2/13/2024	BBK	(Reduced Charge) Travel to/from CMC.	0.5	0.5
2/13/2024	BBK	Conferring w/ RBGG team and co-counsel re CMC and Order setting briefing schedule for class cert motion.	0.4	
2/13/2024	BBK	Meeting w/ KES re CMC, class cert briefing, and inspections.	0.2	
2/13/2024	BBK	Reviewing emails w/ G. Waters and J. Mastin re re-inspections.	0.1	
2/13/2024	BBK	Reviewing/commenting on AX draft reply section of joint letter brief re: interrogatory responses; reviewing emails w/ MTJ re same.	0.2	
2/13/2024	BBK	Emailing w/ AX re timing and method of notifying Judge Beeler re: schedule and timeline for taking additional depositions allowed by her order.	0.1	
2/13/2024	BBK	Attending CMC.	0.7	
2/13/2024	AHS	Read order from CMC, GCG's notes, and emails from team re upcoming deadlines and next steps.	0.3	
2/13/2024	AX	Draft single spaced one-page letter brief reply re interrogatories, including legal research; emails with team re same.	4.5	
2/13/2024	KES	Review and circulate briefing schedule and calendar deadlines re same.	0.5	
2/13/2024	KES	Review and circulate sealing order.	0.1	
2/13/2024	KES	Review emails with co-counsel re discovery issues.	0.1	
2/13/2024	DLE	Organize material for BBK for hearing on motion to compel class list.	1.9	
2/14/2024	GCG	Conf w/ JSY re plan for class cert reply and ongoing discovery.	0.2	
2/14/2024	JSY	Conf. w/ GCG re CMC and briefing schedule.	0.2	
2/14/2024	JSY	Emails re stipulation re Reply due date.	0.2	
2/14/2024	JSY	Emails re stipulation re Reply deadline; draft and finalize same; file same.	0.5	
2/14/2024	BBK	Reviewing emails w/ opposing counsel re stipulating to move deadline for Pls' Reply ISO Class Cert Motion.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 811

SERVICES

Date	Person	Description of Services	Hours	Discount
2/14/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re finalizing letter brief re Interrogatories and scheduling final meet and confer re same.	0.1	
2/14/2024	BBK	Emailing w/ AX and co-counsel re timing and method of notifying MJ Beeler re issue of timing of taking additional depositions as ordered by her discovery order.	0.1	
2/14/2024	BBK	Emailing w/ co-counsel re proposed agenda for request for meet and confer on outstanding disc disputes.	0.1	
2/14/2024	BBK	Emailing w/ M. Johnson and G. Wallace re plan for hearing on MTC Class List.	0.2	
2/14/2024	BBK	Phone call w/ M. Johnson re plan for hearing on MTC Class List.	0.2	
2/14/2024	BBK	Preparing for hearing on MTC Class List (including analysis of briefing and related pleadings; brainstorming and drafting outline and talking points for same; revising same per comments by G. Wallace and M. Johnson).	6.5	
2/14/2024	AHS	Reviewed Brookdale emails re: discovery and emailed BBK re: preparing for motion to compel class list hearing tomorrow.	0.2	
2/14/2024	AHS	Updated master list of deadlines and status of ongoing tasks.	0.8	
2/14/2024	AHS	Emailed with AX about upcoming meeting with two named plaintiffs.	0.2	
2/14/2024	AX	Emails with cocounsel re revisions to interrogatories letter brief; revise and sednd to opposing counsel.	1.2	
2/14/2024	AX	Emails with DE re exhibits to Brookdale Senate letter.	0.5	
2/14/2024	AX	Schedule prep call with Bernie Jestrabek-Hart re interrogatories issues; call with Bernie re same.	0.5	
2/14/2024	AX	Revise Brookdale letter to Senate committee and emails re same.	0.3	
2/14/2024	KES	Confer DE re documents for Sen. Casey.	0.2	
2/14/2024	DLE	Prepare exhibits for letter to Sen. Casey; send to AX.	0.8	
2/15/2024	GCG	Emails to GW and team re MJ Beeler order re motion to compel hearing and next steps.	0.1	
2/15/2024	GCG	Emails to ER, JB and plaintiffs re meet and confer call.	0.1	
2/15/2024	GCG	Conf w/ JSY re plan for trial preparation.	0.2	
2/15/2024	GCG	Confs w/ BBK and KES re cancellation of oral argument and next steps on discovery.	0.3	
2/15/2024	JSY	Emails re discovery order.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 812

SERVICES

Date	Person	Description of Services	Hours	Discount
2/15/2024	JSY	Conf. w/ GCG re discovery issues.	0.1	
2/15/2024	BBK	Reviewing Court Order taking hearing on Motion to Compel class list off calendar; conferring w/ co-counsel re same.	0.2	
2/15/2024	BBK	Emailing w/ co-counsel and opposing counsel re meeting and conferring IRT Court's Order and re: pending discovery disputes.	0.2	
2/15/2024	BBK	Meeting w/ M. Johnson, G. Wallace, T. Close and AX to prepare for meet and confer.	0.3	
2/15/2024	BBK	Meeting and conferring w/ Ds re discovery disputes.	1.4	
2/15/2024	BBK	Debriefing w/ AX re meet and confer and conferring re notes from same.	0.1	
2/15/2024	BBK	Emailing w/ RBGG team re Ds' proposed compromise re: interrogatory responses and re: joint inspections.	0.1	
2/15/2024	BBK	Meeting w/ GCG re Court's Order re re-briefing Motion to Compel class list and implications for case.	0.2	
2/15/2024	BBK	Emailing w/ co-counsel and AX re potential compromise counter-proposals to Ds re discovery disputes and identifying EDs to depose.	0.2	
2/15/2024	AHS	Reviewed emails with team re court order requiring new M&Cs and letter briefs instead of joint briefing.	0.1	
2/15/2024	AHS	Reviewed notes and team correspondence regarding M&C.	0.1	
2/15/2024	AX	Review magistrate judge order and emails from team re discovery issues, pending disputes, prep for M&C.	0.5	
2/15/2024	AX	Pre-call with MJ, BBK, GW, TC for M&C.	0.4	
2/15/2024	AX	M&C with defs re discovery issues.	1.4	
2/15/2024	AX	Draft and circulate notes from M&C and related email to team.	1.0	
2/15/2024	AX	Email correspondence with team re Scotts Valley ED depositions.	0.3	
2/15/2024	AX	Call with Bernie Jestrabek-Hart.	0.2	
2/15/2024	AX	Analysis of interrogatories responses and Defs' position from M&C; email to team re same.	1.0	
2/15/2024	KES	Download and circulate order and calendar deadline.	0.1	
2/16/2024	GCG	Conduct meeting w/ co-counsel re additional discovery needed for expert reports and trial.	0.8	
2/16/2024	GCG	Conduct meeting w/ RBGG team re same.	0.2	
2/16/2024	GCG	Conf w/ AX re letter to Senate Committee on Aging.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/16/2024	GCG	Review Judge Beeler order re discovery.	0.1	
2/16/2024	GCG	Conf w/ and emails to JSY re same and next steps.	0.2	
2/16/2024	GCG	Emails to named plaintiffs and key witnesses re congressional investigation into assisted living.	0.5	
2/16/2024	JSY	Team meeting to discuss case tasks and strategy; conf. w/ RBGG team re same.	1.2	
2/16/2024	JSY	Conf. w/ AS re motion for reconsideration re depos.	0.6	
2/16/2024	JSY	Conf. and emails re order from Judge Beeler re depos.	0.2	
2/16/2024	AHS	Call with co-counsel and then with GCG, JY, AX, DLE, KS re: status of discovery letter briefs and next steps.	1.2	
2/16/2024	AHS	Call with JY about arguments we should make in our opposition to Defs' mot for leave to move for reconsideration of MJ Beeler's order granting depositions.	0.6	
2/16/2024	AHS	Researched Local Rules and law regarding motions for reconsideration.	0.5	
2/16/2024	AHS	Read Defendants' motion for leave to move for reconsideration and courts' order denying their first motion.	0.3	
2/16/2024	AHS	Updated internal project management document with case task assignments and deadlines and circulated internally.	0.6	
2/16/2024	AHS	Reviewed internal emails regarding interrogatories dispute.	0.2	
2/16/2024	AX	Email communications with GCG re senate letter.	0.1	
2/16/2024	AX	Finalizing senate letter.	0.5	
2/16/2024	AX	Call to Senate committee office re letter.	0.2	
2/16/2024	AX	Team meeting re case tasks.	1.2	
2/16/2024	AX	Draft email re interrogatories follow up.	0.7	
2/16/2024	AX	Review team emails re discovery issues.	0.5	
2/16/2024	AX	Review materials re FSP expert search.	0.7	
2/16/2024	FGL	Review GCG email re draft letter to Senator finalize same, including Exhibits.	0.2	
2/16/2024	KES	Participate in Zoom meeting with co-counsel re discovery issues.	1.2	
2/16/2024	KES	Calendar deadlines.	0.1	
2/16/2024	KES	Download and circulate pleadings and calendar motion deadlines.	0.3	
2/16/2024	KES	Confirm public versions of documents sent to Sen. Casey.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/16/2024	KES	Review and circulate order.	0.1	
2/16/2024	DLE	Attend and note-take weekly co-counsel meeting and RBGG only debrief.	1.2	
2/16/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.3	
2/16/2024	DLE	Work with AX and KES to check exhibits for letter to Sen. Casey.	0.2	
2/17/2024	GCG	Review Senate hearing on assisted living understaffing.	0.3	
2/17/2024	GCG	Emails to named plaintiffs and key witnesses re same.	0.2	
2/19/2024	GCG	Email to AX and MJ re meet and confer issues.	0.1	
2/19/2024	AX	Emails with team re discovery issues.	0.2	
2/20/2024	GCG	Confs w/ BBK and JSY re next steps in discovery.	0.2	
2/20/2024	JSY	Emails and calls re discovery meet and confer.	0.2	
2/20/2024	BBK	Reviewing Ds' renewed motion for leave to file motion for reconsideration of order granting Ps additional depositions.	0.1	
2/20/2024	BBK	Reviewing M. Johnson-AX comm'ns re proposed response to Ds' compromise offer re responding to Interrogatories.	0.2	
2/20/2024	BBK	Phone call w/ GCG re immediate tasks in light of Friday Court Order.	0.1	
2/20/2024	BBK	Reviewing DE notes from 2/16 co-counsel meeting and AHS updated case task list.	0.3	
2/20/2024	BBK	Emailing RBGG team re preparing PRA requests to emergency responders for jurisdictions covering named Pls' facilities for evidence of caregiver understaffing.	0.1	
2/20/2024	BBK	Emailing w/ team re: meeting and conferring w/ Ds over additional depositions and need to do w/r/t dispute over benchmark formula and transportation class list prior filing letter briefs.	0.2	
2/20/2024	BBK	Analyzing Ds' 2/16 meet and confer letter re: outstanding discovery disputes and proposed stipulation.	0.2	
2/20/2024	BBK	Emailing GCG and JSY re meeting to plan staffing of immediate tasks needed for discovery.	0.2	
2/20/2024	BBK	Conferring w/ RBGG team re Ds' dates for joint inspections of 5 of 6 named Pls' facilities; reviewing emails w/ G. Waters and J. Mastin re same.	0.1	
2/20/2024	BBK	Emailing w/ JSY re meeting on scope of letter brief re transportation class list.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2024	BBK	Reviewing R. Steyer email re plan for subpoenaing and scheduling depositions of happy camper declarants; emailing w/ RBGG team re same.	0.3	
2/20/2024	BBK	Reviewing AX notes from 2/20 meet and confer w/ Ds re additional depos.	0.1	
2/20/2024	BBK	Drafting/sending proposed compromise re happy camper declarant depositions to team.	0.2	
2/20/2024	BBK	Reviewing AX emails re withdrawing sealing motion related to motion to compel benchmark formula.	0.1	
2/20/2024	AHS	Emailed with AX to plan for call with named plaintiff.	0.2	
2/20/2024	AHS	Reviewed documents to prepare for call with named Plaintiff.	0.2	
2/20/2024	AHS	Call w AX re approach to our joint call with named plaintiff re supplemental discovery responses.	0.2	
2/20/2024	AHS	Call w AX and named plaintiff re: supplementary discovery responses.	0.9	
2/20/2024	AHS	Drafted notes re follow up from call with class member.	0.2	
2/20/2024	AHS	Call with AX re: next steps for getting and reviewing discovery documents from named plaintiff.	0.2	
2/20/2024	AHS	Corresponded with co-counsel re: discovery database.	0.2	
2/20/2024	AHS	Talked to KS re organizing and analyzing discovery documents.	0.2	
2/20/2024	AHS	Read AX's notes from the meet & confer today.	0.2	
2/20/2024	AHS	Emailed w AX & JY re: expert inspection of Scotts Valley facility and scheduling conflicts.	0.3	
2/20/2024	AX	Prep for call with Bernie Jestrabek-Hart re supplementing docs/interrogatories.	0.7	
2/20/2024	AX	Call with Bernie Jestrabek-Hart and AS re supplementing discovery.	1.0	
2/20/2024	AX	Meet and confer re deposition issues.	0.5	
2/20/2024	AX	Emails and calls with with KES, AS re prior productions and follow up from call with Bernie.	0.4	
2/20/2024	AX	Clean up notes from M&C and circulate to team with analysis.	0.5	
2/20/2024	AX	Emails re scheduling happy camper depositions.	0.3	
2/20/2024	AX	Emails re sealing with OC.	0.3	
2/20/2024	AX	Emails re Scotts Valley executive directors.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 816

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2024	KES	Review emails re inspection schedule, calendar dates and confer BBK re same.	0.2	
2/20/2024	KES	Check TextMap user status and add DE and AS to case.	0.2	
2/20/2024	KES	Run Relativity searches re documents produced by client in connection with supplemental production; brief review of current files re same.	0.6	
2/21/2024	GCG	Conf w/ and email to JSY re discovery plan.	0.2	
2/21/2024	GCG	Meet w/ RBGG team re same and re inspections and depositions.	0.3	
2/21/2024	JSY	Team meeting re case tasks.	0.5	
2/21/2024	JSY	Emails and conf. re discovery issues.	0.2	
2/21/2024	BBK	Reviewing M. Johnson - J. Bertino comm'ns re supplemental staffing-related data and emergency evacuation policies.	0.1	
2/21/2024	BBK	Reviewing AX report re call w/ B. Jestrabek-Hart re supplementing document production.	0.1	
2/21/2024	BBK	Analyzing court's recent discovery orders in preparation for meeting w/ JSY re same.	0.2	
2/21/2024	BBK	Meeting w/ KES re court's recent discovery orders and inspections of pls' facilities.	0.2	
2/21/2024	BBK	Emailing w/ JSY and RBGG team re check-in on outstanding discovery-related tasks.	0.2	
2/21/2024	BBK	Planning letter brief and potential exhibits re dispute over production of class lists.	0.8	
2/21/2024	BBK	Preparing for meeting w/ RBGG team re resolving discovery disputes, taking depositions, and conducting inspections.	0.3	
2/21/2024	BBK	Meeting w/ RBGG team re resolving discovery disputes, taking depositions, and conducting inspections.	0.4	
2/21/2024	BBK	Revising/commenting on M. Johnson draft omnibus meet and confer letter.	0.8	
2/21/2024	BBK	Conferring w/ M. Johnson re revisions to draft omnibus meet and confer letter and need to M&C on disputes from terminated motions to compel.	0.3	
2/21/2024	BBK	Reviewing/commenting on AHS's updated case task list.	0.2	
2/21/2024	AHS	Emailed AX re: named plaintiff's documents for discovery production.	0.2	
2/21/2024	AHS	Coordinated with KS, AX, and discovery vendor about discovery docs we need to produce.	0.5	
2/21/2024	AHS	Review named plaintiff's emails for discovery production.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/21/2024	AHS	Updated internal document tracking all components of case, including discovery tasks, upcoming deadlines, and assignments. Circulated to team.	0.6	
2/21/2024	AHS	Internal team meeting to discuss letter to opposing counsel, facility inspection dates, and other discovery matters.	0.5	
2/21/2024	AX	Emails with team re case tasks, United Litigation re pls' supplementation, discovery issues.	0.8	
2/21/2024	AX	Team meeting re case tasks.	0.5	
2/21/2024	KES	Emails with AS re gathering client docs for supplemental production.	0.2	
2/21/2024	DLE	Attend team meeting re case issues and assignments.	0.8	
2/22/2024	GCG	Conf w/ JSY re defendants' attempt to depose JA.	0.1	
2/22/2024	GCG	Emails to MJ and team re same.	0.1	
2/22/2024	GCG	Conf w/ WAPO reporter re Brookdale understaffing.	0.2	
2/22/2024	GCG	Review Cindy Baier report on corporate strategy and staffing charges.	0.1	
2/22/2024	JSY	Conf. and emails re JA deposition.	0.2	
2/22/2024	JSY	Emails re supplementation of doc production by BJH.	0.1	
2/22/2024	BBK	Emailing w/ co-counsel and opposing counsel re meeting and conferring on discovery disputes.	0.1	
2/22/2024	BBK	Reviewing GCG report re PC w/ Washington Post reporter re story on BD.	0.1	
2/22/2024	BBK	Reviewing McKnights Senior Living article re: BD CEO comments on Senate inquiry into assisted living.	0.1	
2/22/2024	BBK	Analyzing Ds' 2/22 meet and confer letter re: discovery disputes; conferring w/ team re same.	0.2	
2/22/2024	BBK	Reviewing AHS report re discovery vendor quote for pulling B. Jestrabek-Hart email/phone records for supp doc production and emails w/ JSY re same.	0.1	
2/22/2024	BBK	Emailing w/ co-counsel and RBGG team re Ds' request to take second deposition of J. Algarme.	0.1	
2/22/2024	BBK	Drafting/revising Ps' portion of letter brief seeking production of class list for certified class and putative facility-specific classes.	4.5	
2/22/2024	BBK	Emailing w/ co-counsel and RBGG team re draft letter brief re class lists and exhibits thereto.	0.2	
2/22/2024	AHS	Upload discovery docs.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/22/2024	AHS	Call with discovery vendor and KS re BJH doc issues.	0.3	
2/22/2024	AHS	Call with KS re next steps.	0.1	
2/22/2024	AHS	Comms w/ team to re info from discovery vendor.	0.7	
2/22/2024	AX	Emails re sealing issues, supplementing pls' response to interrogatories, other case tasks.	0.6	
2/22/2024	KES	Zoom meeting with AS and discovery vendor re gathering client emails and texts for supplemental production.	0.4	
2/22/2024	DLE	Save and circulate letters from opposing counsel.	0.2	
2/23/2024	GCG	Review emails to GW and team re revised letter brief and meet and confer w/ defendants.	0.1	
2/23/2024	JSY	Team meeting re case tasks (1.1); meeting with RBGG team re same (0.2).	1.3	
2/23/2024	JSY	Conf. w/ AS re email re Algarme deposition.	0.1	
2/23/2024	JSY	Conf and emails re discovery meet and confer.	0.3	
2/23/2024	JSY	Revise email re Algarme deposition.	0.2	
2/23/2024	BBK	Emailing w/ co-counsel and RBGG team re compromise position re: responses to interrogatories.	0.1	
2/23/2024	BBK	Analyzing 9th Cir opinion cited by Ds ISO position that we are not entitled to putative class list.	0.2	
2/23/2024	BBK	Conferring w/ co-counsel re proposed agenda for meet and confer.	0.2	
2/23/2024	BBK	Emailing w/ J. Mastin and G. Waters re re-inspections of named Pls' facilities.	0.1	
2/23/2024	BBK	Meeting and conferring w/ opposing counsel on all discovery disputes.	1.4	
2/23/2024	BBK	Debriefing w/ AX on meet and confer and discussing notes from same.	0.2	
2/23/2024	BBK	Meeting w/ JSY to debrief re meet and confer in advance of co-counsel meeting.	0.2	
2/23/2024	BBK	Meeting w/ co-counsel re case priorities and discovery disputes.	1.0	
2/23/2024	BBK	Post-co-counsel meeting w/ RBGG team re immediate case tasks.	0.2	
2/23/2024	BBK	Revising Pls' portion of letter brief re class lists.	0.3	
2/23/2024	BBK	Emailing w/ co-counsel re revised Pls' portion of letter brief re class lists.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/23/2024	BBK	Reviewing/incorporating G. Wallace comments on Pls' portion of letter brief re class lists; finalizing/sending same to opposing counsel.	0.3	
2/23/2024	BBK	Post-meet and confer emails w/ co-counsel re: discovery discovery and other follow-up.	0.2	
2/23/2024	BBK	Reviewing AHS draft email response to Ds re request to conduct second deposition of J. Algarme and JSY revisions to same.	0.1	
2/23/2024	BBK	Reviewing Ds' portion of letter brief seeking reconsideration of order allowing additional depositions and materials needed to oppose same.	0.3	
2/23/2024	BBK	Reviewing AHS's updated case task list.	0.1	
2/23/2024	AHS	Reviewed emails with co-counsel regarding today's M&C with defendants.	0.3	
2/23/2024	AHS	Updated project management chart of active deadlines and upcoming tasks for team.	0.5	
2/23/2024	AHS	Weekly call with JY, AX, BBK, DLE, and co-counsel to debrief this morning's M&C and discussed the status of ongoing discovery disputes and letter briefs.	1.2	
2/23/2024	AHS	Call w JY BBK AX DLE to discuss and assign next steps internally including drafting discovery-related correspondence to send to opposing counsel.	0.2	
2/23/2024	AHS	Conducted legal research and drafted email to opposing counsel re: contested deposition.	1.9	
2/23/2024	AHS	Reviewed emails re: discovery correspondence based on co-counsel call.	0.1	
2/23/2024	AHS	Updated case tasks list based on notes from call with co-counsel.	0.6	
2/23/2024	AX	Emails to team re M&C and prep re same.	0.5	
2/23/2024	AX	Emails re facility inspections.	0.1	
2/23/2024	AX	Attend M&C.	1.5	
2/23/2024	AX	Clean up notes from M&C and follow up with team re same.	0.5	
2/23/2024	AX	Attend team meeting with cocounsel, meeting with RBGG re case tasks.	1.4	
2/23/2024	KES	Consider needed paralegal case tasks and review notes from team meeting.	0.5	
2/23/2024	DLE	Attend and note-take weekly meeting with co-counsel.	1.1	
2/23/2024	DLE	Attend and note-take RBGG-only debrief meeting.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 820

SERVICES

Date	Person	Description of Services	Hours	Discount
2/23/2024	DLE	Finalize and circulate notes from weekly team meeting and RBGG only debrief.	0.3	
2/24/2024	AX	Draft email to cocounsel re discovery disputes.	0.5	
2/25/2024	AX	Review emails from cocounsel re case tasks.	0.2	
2/26/2024	GCG	Conf w/ JSY and emails to BBK and team re ongoing meet and confer re interrogatories, depositions and inspections.	0.5	
2/26/2024	JSY	Emails re discovery issues.	0.1	
2/26/2024	JSY	Emails and conf. re site inspections.	0.2	
2/26/2024	JSY	Conf. w/ BBK re class list disputes.	0.1	
2/26/2024	JSY	Conf. w/ GCG re staffing issues for case.	0.1	
2/26/2024	JSY	Emails re site inspections.	0.1	
2/26/2024	JSY	Emails re process service for happy camper declarants.	0.1	
2/26/2024	BBK	Reviewing/revising AX draft email to D re position on dispute over interrogatories; conferring w/ co-counsel and AX re same.	0.5	
2/26/2024	BBK	Reviewing emails between AX-ERutner-MJohnson re Ds' changed position on interrogatories responses since 2/23 meet and confer.	0.1	
2/26/2024	BBK	Reviewing Ds' email objecting to preparing response to letter brief re: class lists; emailing w/ RBGG team and co-counsel re: responding to same.	0.2	
2/26/2024	BBK	Drafting proposed response to E. Rutner email refusing to prepare response to letter brief re: class lists.	0.3	
2/26/2024	BBK	Phone call w/ JSY re proposed response to E. Rutner email refusing to prepare response to letter brief re: class lists.	0.1	
2/26/2024	BBK	Revising proposed response to E. Rutner email refusing to prepare response to letter brief re: class lists; conferring w/ co-counsel and finalizing/sending same.	0.3	
2/26/2024	BBK	Reviewing E. Rutner response re: letter brief on class lists and insisting Ds' will draft their own letter brief; conferring w/ M. Johnson re responding to same.	0.2	
2/26/2024	BBK	Conferring w/ RBGG team and co-counsel re coordination w/ Pls' access experts re joint inspections.	0.2	
2/26/2024	BBK	Meeting w/ Pls' access experts re joint inspections (w/ G. Wallace, M. Johnson, AX and AHS).	0.5	
2/26/2024	BBK	Reviewing/revising AHS notes from meeting w/ access experts re: joint inspections; answering JSY query re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/26/2024	BBK	Planning/drafting/revising Pls' letter brief opposing Ds' motion for reconsideration of order re additional depositions.	5.6	
2/26/2024	BBK	Emailing w/ co-counsel re: 30(b)(6) deposition notice re transportation policies/practices & re: Ds' theory re: legality of Fleet Safety Policy based on doc production re: fleet size/capacity.	0.2	
2/26/2024	BBK	Reviewing emails w/ opposing counsel re: Ds' request to stipulate to withdraw MTC benchmarks formula, Ds' changed position re: production of resident-declarant files, and proposed date for Johnson depo.	0.1	
2/26/2024	BBK	Emailing w/ R. Steyer and RBGG team re: coordinating service of deposition subpoenas on resident declarants.	0.1	
2/26/2024	AHS	Reviewed team correspondence re: status of interrogatory dispute and inspections.	0.2	
2/26/2024	AHS	Call with experts Waters & Mastin and AX, BBK, MJ and GW.	0.6	
2/26/2024	AHS	Consolidated notes from call with experts' and circulated them to RBGG team, and responded to questions.	0.3	
2/26/2024	AHS	Emailed team clarifying Brookdale inspection question.	0.2	
2/26/2024	AHS	Reviewed emails with opposing counsel re: unresolved discovery issues.	0.3	
2/26/2024	AHS	Emailed with AX re: coordinating discovery regarding named plaintiff.	0.2	
2/26/2024	AX	Call with Jeff Mastin, Gary Waters, cocounsel and team re upcoming facility inspections and issues re same.	0.6	
2/26/2024	AX	Email analysis re Brookdale dispute of interrogatories.	0.7	
2/26/2024	AX	Draft email to opposing counsel re interrogatories dispute.	0.5	
2/26/2024	AX	Emails with team re call about facility inspections.	0.2	
2/26/2024	AX	Emails to opposing counsel re interrogatories dispute.	0.4	
2/26/2024	AX	Calls with JSY, MJ, GW re staffing for facility tours.	0.5	
2/26/2024	AX	Emails to team re sealing motion.	0.2	
2/26/2024	AX	Email correspondence with team re interrogatories dispute, depositions of happy campers, responding to discovery for plaintiffs.	0.4	
2/26/2024	AX	Review team correspondence re production of class list dispute.	0.2	
2/26/2024	AX	Correspondence with KES re facility reports in prep for Brookdale site inspections.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/26/2024	AX	Review Hemet and Brookhurst facility inspection reports.	0.4	
2/26/2024	AX	Review AS notes from call with experts re facility inspections.	0.2	
2/26/2024	KES	Emails with team re serving subpoenas.	0.2	
2/26/2024	KES	Gather prior expert facility reports for AX in preparation for inspections.	0.3	
2/26/2024	DLE	Update calendar re new facility inspection dates.	0.3	
2/27/2024	GCG	Conf w/ BBK re inspections and discovery letter briefs.	0.2	
2/27/2024	JSY	Emails re site inspections.	0.2	
2/27/2024	JSY	Conf. w/ BBK re site inspections and discovery disputes.	0.2	
2/27/2024	JSY	Emails re Algarme deposition.	0.1	
2/27/2024	BBK	Conferring w/ co-counsel, RBGG team, and access experts re staffing inspections.	0.3	
2/27/2024	BBK	Meeting w/ GCG re completing discovery and expert reports.	0.1	
2/27/2024	BBK	Reviewing further emails between M. Johnson-E. Rutner re further changes to inspections schedule; emailing w/ co-counsel re FU w/ Ds re proposed compromise on demand for 2d Algarme deposition; emailing w/ AX and co-counsel re finalizing letter brief re Ds' refusal to answer Interrogatories.	0.2	
2/27/2024	BBK	Reviewing/commenting on M. Johnson final draft notice of 30(b)(6) transportation deposition.	0.1	
2/27/2024	BBK	Reviewing M. Johnson and R. Steyer revisions/comments on letter brief re: reconsideration of deposition order; revising accordingly.	0.6	
2/27/2024	BBK	Analyzing 30(b)(6) deposition testimony re: service alignment for letter brief on reconsideration of deposition order; conferring w/ M. Johnson and R. Steyer re same.	0.4	
2/27/2024	BBK	Finalizing/sending to Ds letter brief on reconsideration of deposition order.	0.1	
2/27/2024	BBK	Drafting separate letter briefs to compel production of (1) transportation class list and (2) putative facility-specific subclass lists.	3.4	
2/27/2024	BBK	Reviewing/commenting on AX report re plan for subpoenaing and scheduling resident-declarant depositions.	0.1	
2/27/2024	BBK	Emailing w/ M. Johnson re draft narrowed ESI search terms/custodians and request for supplemental doc production.	0.1	
2/27/2024	AHS	Emailed with team re: new inspection dates and coverage.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2024	AHS	Call with AX discussing discovery vendor and plan for getting texts and emails from named plaintiff.	0.4	
2/27/2024	AHS	Organized and saved notes from call w AX re: named plaintiff's documents and plan for getting them.	0.1	
2/27/2024	AHS	Emails re: discovery disputes and coordinated with co-counsel about a response re: deposition.	0.1	
2/27/2024	AHS	Reviewed comments on draft email re: deposition dispute and responded to team.	0.1	
2/27/2024	AX	Prepare letter to Bernie Jestrabek-Hart re requests for production and documents.	0.5	
2/27/2024	AX	Review class member declarations and prep for meeting with RS, KES.	1.0	
2/27/2024	AX	Call with AS re Bernie Jestrabek-Hart interrogatories and requests for documents.	0.4	
2/27/2024	AX	Call with AS re Bernie Jestrabek-Hart documents.	0.2	
2/27/2024	AX	Emails and correspondence with BBK re analysis of 30b6 testimony.	0.2	
2/27/2024	AX	Revise interrogatories letter brief and emails with team re same.	0.7	
2/27/2024	AX	Research potential FSP experts and draft memo re same.	0.7	
2/27/2024	AX	Revise interrogatory responses.	0.8	
2/27/2024	KES	Zoom with AX and RS re declarant depositions.	0.4	
2/27/2024	KES	Review files and emails with AX and R. Steyer re form of prior declarant subpoenas, cover letters and instructions to server.	0.4	
2/27/2024	KES	Westlaw and online research to confirm current addresses of declarants to be deposed.	1.6	
2/27/2024	KES	Research possible locations for declarant depos.	1.5	
2/28/2024	GCG	Conf w/ JSY and emails to MJ and team re inspections and discovery disputes.	0.2	
2/28/2024	JSY	Conf. w/ GCG re inspections.	0.2	
2/28/2024	JSY	Multiple emails and messages re site inspections.	0.5	
2/28/2024	BBK	Emailing w/ co-counsel re resident-declarant depositions.	0.1	
2/28/2024	BBK	Reviewing M. Jacobsen / AX emails re seeking court's guidance re: Ds' desire to withdraw omnibus sealing motion and emails w/ court re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/28/2024	BBK	Reviewing E. Rutner emails rejecting proposed compromises on (1) narrowed ESI and doc supplementation; and (2) Ds' demand for 2d deposition of Algarme.	0.1	
2/28/2024	BBK	Follow-up email to co-counsel re revisions/comments on 2 draft letter briefs re class lists.	0.1	
2/28/2024	BBK	Reviewing M. Jacobsen email changing dates for inspections and conferring w/ co-counsel re responding to same.	0.2	
2/28/2024	BBK	Meeting w/ KES re inspections.	0.2	
2/28/2024	BBK	Emailing w/ co-counsel and RBGG team re plan for staffing new inspection dates and for meet and confer re: protocols for inspections.	0.5	
2/28/2024	BBK	Phone call w/ AHS re staffing inspections.	0.2	
2/28/2024	BBK	Emails re inspection of Fountaingrove facility.	0.2	
2/28/2024	BBK	Meet and confer w/ Ds re inspections.	0.6	
2/28/2024	BBK	Debriefing w/ RBGG team re meet and confer w/ Ds re inspections.	0.3	
2/28/2024	BBK	Emailing w/ co-counsel re plan for inspections ILO meet and confer.	0.3	
2/28/2024	BBK	Factual research into facility formerly known as Fountaingrove and emailing w/ co-counsel re same.	0.3	
2/28/2024	BBK	Conferring w/ AX re finalizing/filing letter brief re interrogatories and exhibits to same.	0.2	
2/28/2024	AHS	Reviewed correspondence regarding discovery disputes, including defendants' response re: depo of named plf.	0.3	
2/28/2024	AHS	Emailed with cocounsel and AX, BBK, JY, GCG re: coverage for joint expert inspections of Brookdale facilities.	0.6	
2/28/2024	AHS	Call with BBK re: coverage for Brookdale expert inspections.	0.2	
2/28/2024	AHS	Meet and confer with opposing counsel, co-counsel, and AX and BBK.	0.6	
2/28/2024	AHS	Debriefed with BBK JY AX about meet and confer and discussed our approach to attending the joint expert inspections.	0.2	
2/28/2024	AX	Emails to opposing counsel re omnibus sealing motion and email to the court; emails with team re same.	0.2	
2/28/2024	AX	Emails with RS, KES re resident file production to prep for depositions.	0.2	
2/28/2024	AX	Research re expert witnesses for FSP issues; emails with GCG re same.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/28/2024	AX	Meeting with opposing counsel and team re Brookdale facility inspections.	0.6	
2/28/2024	AX	Correspondence with team re schedule for facility inspections.	0.1	
2/28/2024	AX	Correspondence with team re scheduling and organizing depositions of Brookdale declarants/residents.	0.5	
2/28/2024	AX	Email with John Bertino re exhibits for letter brief; revise letter brief citations and finalize for filing.	0.7	
2/28/2024	AX	Calls with KES re exhibits for letter brief filing.	0.3	
2/28/2024	AX	Emails with GW re letter brief filing.	0.2	
2/28/2024	KES	Prepare exhibits for discovery letter brief re interrogatories.	1.8	
2/28/2024	KES	Draft declarant deposition subpoenas and cover letters.	3.3	
2/28/2024	KES	Brief review of newly produced documents in Relativity.	0.5	
2/28/2024	DLE	Circulate new facility inspection dates to team per BBK instruction.	0.3	
2/29/2024	GCG	Communications w/ JSY and BBK re inspection issues.	0.1	
2/29/2024	GCG	Review ESI contract for retrieval of named plaintiff phone data.	0.1	
2/29/2024	GCG	Conf w/ AS re same.	0.1	
2/29/2024	GCG	Conf w/ and email to KES re 911 data.	0.1	
2/29/2024	JSY	Emails re site inspections.	0.1	
2/29/2024	JSY	Research re named plaintiff rooms for site inspections; emails re same.	0.2	
2/29/2024	JSY	Emails re discovery disputes.	0.1	
2/29/2024	JSY	Emails and messages re supplementation of plaintiffs' documents.	0.1	
2/29/2024	BBK	Reviewing M. Johnson report to access experts and team re plan for inspections ILO 2/28 meet and confer re same.	0.2	
2/29/2024	BBK	Emailing w/ co-counsel re draft letter briefs seeking production of class lists.	0.1	
2/29/2024	BBK	Emailing w/ AHS/AX/JSY/M.Johnson re identifying units that access experts were not permitted to measure and/or photograph during original inspections.	0.4	
2/29/2024	BBK	Emailing w/ co-counsel and AHS re responding to Ds demand for 2d depo of Algarme and rejection of offer of written deposition as compromise.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/29/2024	BBK	Emailing w/ AX and AHS re plan for scheduling/staffing resident-declarant depositions and supbeonaing same.	0.3	
2/29/2024	BBK	Reviewing/incorporating M. Johnson proposed revisions to two letter briefs re class lists and revising accordingly; finalizing/sending same to Ds.	1.1	
2/29/2024	BBK	Conducting factual research re: which rooms Lindstrom and Carlson resided in for Fountaingrove and Scotts Valley inspections.	0.6	
2/29/2024	BBK	Conferring w/ M. Johnson, AX, and JSY re identifying all rooms where named Pls resided for upcoming inspections.	0.3	
2/29/2024	BBK	Reviewing E. Rutner - M. Johnson emails re Ds' position on ESI search terms/custodians; conferring w/ team re responding to same.	0.2	
2/29/2024	BBK	Analyzing Ds' Reply ISO motion for reconsideration of depositions order; emailing co-counsel w/ recommendations for final proposed compromise re same.	0.3	
2/29/2024	BBK	Conferring w/ RBGG team re compromise options for depositions dispute and scheduling meet and confer; emailing G. Wallace re same.	0.4	
2/29/2024	BBK	Conferring w/ JSY and GCG re PRA responses from emergency responders and locating medical expert re: wheelchair and scooter transfers.	0.1	
2/29/2024	BBK	Emailing w/ co-counsel re Pls' experts' availability for 3/3 inspection of BD Tracy.	0.1	
2/29/2024	BBK	Preparing for 3/5 inspection of former BD Fountaingrove.	0.3	
2/29/2024	BBK	Conferring w/ GCG and JSY re co-counsel meeting on 3/1 re inspections and discovery disputes.	0.1	
2/29/2024	BBK	Reviewing AHS update re obtaining B. Jestrabek-Hart texts/emails for supp doc prod.	0.1	
2/29/2024	AHS	Reviewed correspondence regarding upcoming site inspections, and emailed team with argument re: contested deposition.	0.6	
2/29/2024	AHS	Prepared for and called named plf to discuss discovery documents to produce.	0.5	
2/29/2024	AHS	Emailed with BBK JY AX and co-counsel re: approach to upcoming inspections and depositions.	0.3	
2/29/2024	AHS	Emailed discovery vendor about next steps for extracting documents from named plaintiff.	0.7	
2/29/2024	AHS	Reviewed emails with co-counsel and opposing counsel about ongoing unresolved discovery issues.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
2/29/2024	AHS	Talked to KS about Defs' declarant depositions.	0.2	
2/29/2024	AX	Follow up with GW re filing letter brief; finalize letter brief and file, including correspondence with KES.	0.4	
2/29/2024	AX	Emails re happy camper deponent deposition subpoenas with team.	0.3	
2/29/2024	AX	Emails and correspondence with team re rooms for site inspections and other related issues.	0.6	
2/29/2024	AX	More emails with KES re subpoenas and happy camper depositions.	0.3	
2/29/2024	AX	Call with KES re subpoenas.	0.1	
2/29/2024	AX	Emails and correspondence with team re depositions letter brief.	0.2	
2/29/2024	KES	Finalize and efile discovery letter brief.	0.4	
2/29/2024	KES	Prepare and send chambers copy of discovery letter brief.	1.0	
2/29/2024	KES	Westlaw, internet and Relativity research re resident deponent addresses and names.	1.3	
2/29/2024	KES	Revise, finalize and arrange for service of declarant deposition subpoenas.	2.4	
2/29/2024	KES	Book conference rooms for declarant depositions.	1.5	
3/1/2024	GCG	Emails to BBK, MJ and GW re meet and confer issues.	0.1	
3/1/2024	GCG	Prepare for and conduct meetings w/ co-counsel and internal RBGG team to prepare for inspections and discovery motions.	0.9	
3/1/2024	GCG	Emails to KES and BBK re initial disclosures.	0.1	
3/1/2024	JSY	Emails re site inspections.	0.1	
3/1/2024	JSY	Team meeting.	0.9	
3/1/2024	JSY	Meeting with RBGG team re case tasks.	0.2	
3/1/2024	JSY	Emails and messages re deposition dispute.	0.3	
3/1/2024	JSY	Messages re declarant depositions.	0.1	
3/1/2024	JSY	Conf. w/ AX re depositions and site inspections.	0.2	
3/1/2024	BBK	Emails w/ opposing counsel and Pls' attendees for inspections and re: start times for same.	0.1	
3/1/2024	BBK	Reviewing M. Johnson - E. Rutner emails re: dispute over ESI search terms and custodians.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/1/2024	BBK	Emailing w/ co-counsel re plan for final meet and confer on D's motion for reconsideration re depo order.	0.2	
3/1/2024	BBK	Conferring w/ AX and JSY re plan for final meet and confer on D's motion for reconsideration re depo order.	0.3	
3/1/2024	BBK	Further emails w/ G. Wallace and M. Johnson re: proposed compromise offers for final meet and confer on D's motion for reconsideration re depo order.	0.4	
3/1/2024	BBK	Emailing w/ opposing counsel to schedule final meet and confer on D's motion for reconsideration re depo order.	0.1	
3/1/2024	BBK	Prep for meet and confer on D's motion for reconsideration re depo order.	0.2	
3/1/2024	BBK	Meet and confer on D's motion for reconsideration re depo order; updating team re same.	0.2	
3/1/2024	BBK	Analyzing Ds' final compromise language for letter brief re reconsideration of Depo Order; drafting Pls' final compromise language for same.	0.5	
3/1/2024	BBK	Emailing Ds' re: final letter brief on reconsideration of Deposition Order and to grant authority to file.	0.1	
3/1/2024	BBK	Conferring w/ JSY re Ds' access expert and Ds' potential strategy for inspection and Rule 26(f) reports.	0.2	
3/1/2024	BBK	Locating/sharing memos from TC, GCG and JSY for prior inspections of BD facilities.	0.2	
3/1/2024	BBK	Reviewing AX - M Jacobsen emails re withdrawing stip re omnibus sealing motion relating to MTC benchmark formulas.	0.1	
3/1/2024	BBK	Conferring w/ GCG and KES re PRA responses from emergency responders and inclusion of same in initial disclosures.	0.1	
3/1/2024	BBK	Meeting w/ co-counsel re inspections, depositions and discovery disputes; RBGG debrief following same.	1.1	
3/1/2024	BBK	Conferring w/ JSY/AX/KES re resident declarant depositions.	0.2	
3/1/2024	BBK	Reviewing/approving B. Umpierre draft follow-up email re Ds' delays in producing missing data for staffing experts.	0.1	
3/1/2024	BBK	Analyzing attorney memos from past inspections in prep for Fountaingrove inspection.	0.6	
3/1/2024	BBK	Preparing for Fountaingrove inspection.	0.6	
3/1/2024	BBK	Reviewing/revising KES draft notice of deposition for subpoenaed resident-declarants.	0.1	
3/1/2024	BBK	Reviewing/commenting on AX draft email to opposing counsel re dates for depositions of BD employees.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/1/2024	AHS	Reviewed emails with cocounsel re M&C and discovery disputes.	0.4	
3/1/2024	AHS	Weekly meeting with co-counsel to discuss ongoing discovery disputes and upcoming inspections and other tasks.	0.9	
3/1/2024	AHS	Call with AX, BBK, JY, KS, DLE to follow up on internal allocation of tasks after co-counsel call.	0.2	
3/1/2024	AHS	Call with named plaintiff re: document production.	0.3	
3/1/2024	AHS	Emails re named plaintiff doc prod.	0.4	
3/1/2024	AHS	Updated running chart of ongoing projects, their status, and imminent tasks and deadlines.	0.5	
3/1/2024	AX	Email correspondence to team re site inspections.	0.2	
3/1/2024	AX	Emails and correspondence with KES re process servers, notice of depositions, subpoenas.	0.5	
3/1/2024	AX	Email with opposing counsel re omnibus motion to seal.	0.2	
3/1/2024	AX	Call with team re case tasks and ongoing projects, including questions about strategy.	1.1	
3/1/2024	AX	Call with two happy camper deponents/declarants; draft notes to team.	0.5	
3/1/2024	AX	Email to team re travel for happy campers and notice of depositions.	0.2	
3/1/2024	AX	Draft email to opposing counsel re deposition dates for ED/HWDs; correspondence with team re same.	0.4	
3/1/2024	AX	Correspondence with AS re supplementing discovery.	0.2	
3/1/2024	AX	Review materials from Hemet and Brookhurst re site inspections.	0.5	
3/1/2024	KES	Zoom meeting with co-counsel re upcoming discovery issues.	1.0	
3/1/2024	KES	Emails with process server re service of deposition subpoenas.	0.5	
3/1/2024	KES	Draft, finalize and serve five notices of deposition for deponents served with subpoenas.	2.0	
3/1/2024	KES	Update depo status chart.	0.2	
3/1/2024	DLE	Weekly co-counsel meeting re case issues and tasks; RBGG only debrief.	1.2	
3/1/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.4	
3/1/2024	DLE	Save and circulate update to upcoming site inspection.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/3/2024	GCG	Review letter brief re motion for reconsideration of depositions.	0.3	
3/3/2024	GCG	Review and analyze 911 information and class representative interview for outside expert.	0.3	
3/4/2024	GCG	Emails w/ AX re expert for transportation claim.	0.1	
3/4/2024	GCG	Email w/ BBK re Fountaingrove inspection.	0.1	
3/4/2024	JSY	Emails re site inspections.	0.1	
3/4/2024	JSY	Emails re discovery disputes and depositions of happy camper declarants.	0.1	
3/4/2024	BBK	Reviewing GCG email to WaPo reporter re evidence of understaffing at BD.	0.1	
3/4/2024	BBK	Reviewing M. Johnson report re status of dispute over FSP-related ESI for 30(b)(6) deposition.	0.1	
3/4/2024	BBK	Emailing w/ R. Steyer re BD Tracy inspection.	0.3	
3/4/2024	BBK	Emailing G. Waters re plan for Fountaingrove inspection.	0.3	
3/4/2024	BBK	Drafting email to KL re: parameters and time constraints for Fountaingrove inspection.	0.2	
3/4/2024	BBK	Phone call w/ R. Steyer debriefing on BD Tracy inspection and insights for Fountaingrove inspection.	0.6	
3/4/2024	BBK	Conferring w/ RBGG team re plan for drafting 1-page replies for letter briefs on transportation class list and putative facility-specific class lists.	0.2	
3/4/2024	BBK	Reviewing/revising/commenting on AHS updated case task list.	0.3	
3/4/2024	BBK	Reviewing KL response re: Fountaingrove inspection; updating co-counsel and G. Waters re plan ILO same.	0.2	
3/4/2024	BBK	Phone call w/ G. Waters re plan for Fountaingrove inspection.	0.3	
3/4/2024	BBK	Emailing w/ KL re schedule/plan for Fountaingrove inspection.	0.1	
3/4/2024	BBK	Emailing w/ AX re status of attempted service on happy camper declarant.	0.2	
3/4/2024	BBK	Phone call w/ AX re plan for responding to requests for transport assistance from subpoenaed declarant-residents, drafting reply ISO letter brief re putative facility-specific class lists, and prep for inspections.	0.6	
3/4/2024	BBK	Drafting email to co-counsel and RBGG team re recommended response to subpoenaed resident-declarants requesting transportation assistance to depositions.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/4/2024	BBK	Reviewing J. Bertino email to BU re missing data for staffing experts; conferring w/ JSY re same.	0.1	
3/4/2024	BBK	Prep for Fountaingrove inspection.	1.5	
3/4/2024	BBK	Analyzing Ds' portions of letter briefs re transportation and putative facility specific class lists and writing notes for replies re same for RBGG team.	0.8	
3/4/2024	AHS	Reviewed emails re: discovery disputes and emailed with team about drafting replies.	0.7	
3/4/2024	AHS	Updated internal list of status of projects and upcoming deadlines and assignments.	0.8	
3/4/2024	AX	Review draft of letter brief re putative facility level class lists and call with BBK re same to prepare to draft Reply.	0.4	
3/4/2024	AX	Draft and review emails re various discovery issues.	0.5	
3/4/2024	AX	Emails with team re happy camper deposition scheduling issues.	0.3	
3/4/2024	AX	Emails re documents for inspection prep.	0.3	
3/4/2024	KES	Calendar upcoming depositions.	0.3	
3/4/2024	KES	Emails with process server and AX re attempted service on Zahner and further research re potential address.	1.3	
3/4/2024	KES	Emails re proposed depositions.	0.2	
3/4/2024	KES	Review and organize subpoena POS docs, update declarant depo status.	0.2	
3/5/2024	JSY	Conf. w/ GCG re status of discovery briefs.	0.1	
3/5/2024	BBK	(Reduced Charge) Traveling to Fountaingrove facility for inspection.	0.9	0.9
3/5/2024	BBK	Meeting w/ G. Waters in advance of Fountaingrove inspection.	0.2	
3/5/2024	BBK	Participating in Fountaingrove inspection.	6.4	
3/5/2024	BBK	Debrief w/ G. Waters re Fountaingrove inspection.	0.2	
3/5/2024	BBK	(Reduced Charge) Travel home after Fountaingrove inspection.	0.8	0.9
3/5/2024	BBK	Emailing w/ AX and AHS re status of draft replies for letter briefs re transportation and putative facility-specific class lists.	0.1	
3/5/2024	BBK	Emailing RBGG team re initial thoughts from Fountaingrove inspection.	0.1	
3/5/2024	AHS	Read Defs' response letter brief re: producing transportation class list to prep for drafting Plf's reply.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/5/2024	AHS	Drafted outline of plfs' reply re: producing transportation class list.	0.4	
3/5/2024	AHS	Texted named plaintiff re: document production.	0.1	
3/5/2024	AHS	Phone call with named plaintiff and discovery vendor for email and text extraction for document production.	1.0	
3/5/2024	AHS	Talked with KS about document extraction for named plaintiff.	0.2	
3/5/2024	AHS	Drafted Plaintiffs' reply section of letter brief re: transportation class list.	4.4	
3/5/2024	AX	Legal research and drafting reply for letter brief re putative facility level class lists.	5.5	
3/6/2024	BBK	Emailing w/ AX re follow-up w/ co-counsel on requesting dates for depositions and responding to subpoenaed resident-declarants.	0.1	
3/6/2024	BBK	Revising AHS draft reply ISO letter brief re certified transportation class list.	2.8	
3/6/2024	BBK	Emailing w/ T. Close re Defendants' redactions of names of members of certified class from doc productions.	0.1	
3/6/2024	BBK	Phone call w/ AX re reply ISO letter brief re putative facility-specific class lists and re: Brookhurst inspection.	0.4	
3/6/2024	BBK	Revising AX draft reply ISO letter brief re facility-specific putative class lists.	1.8	
3/6/2024	BBK	Emailing w/ co-counsel re two replies ISO letter briefs on class lists.	0.2	
3/6/2024	BBK	Making further revisions to replies ISO letter briefs on class lists re co-counsel comments and finalizing same.	0.8	
3/6/2024	BBK	Drafting/sending email to opposing counsel w/ two letter briefs re class lists.	0.1	
3/6/2024	BBK	Emailing w/ co-counsel re position for final meet and confer on class lists dispute.	0.2	
3/6/2024	BBK	Emailing w/ co-counsel and opposing counsel re scheduling omnibus meet and confer for 3/8.	0.2	
3/6/2024	BBK	Reviewing Ds' letter re: ESI supplementation.	0.1	
3/6/2024	BBK	Reviewing/commenting on M. Johnson draft email re Ds' continued delays in producing missing data for staffing experts.	0.2	
3/6/2024	BBK	Emails w/ RBGG team re status of preparing supp doc production by B. Jestrabek-Hart.	0.1	
3/6/2024	AHS	Reviewed emails re joint letter briefs regarding putative and certified class lists.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2024	AX	Review Mastin report of Brookhurst and other materials in preparation of inspection on 3/7.	1.0	
3/6/2024	AX	Emails with RS re meet and confer issues.	0.3	
3/6/2024	AX	Emails with team and opposing counsel re deposition dates for ED/HWDs.	0.4	
3/6/2024	AX	Emails with opposing counsel (Kristina Launey) and expert (Jeff Mastin) re Brookhurst inspection.	0.4	
3/6/2024	AX	(Reduced Charge) Call with BBK re case issues, including Brookhurst inspections and letter brief re putative class list.	0.4	0.1
3/6/2024	AX	Review hearing transcript to find citation in facility putative class list letter brief.	0.2	
3/6/2024	AX	Emails with team re calling potential FSP experts; calls with doctors re same.	0.5	
3/6/2024	KES	Online research re potential expert witnesses.	0.8	
3/6/2024	KES	Download Jestrabek-Hart documents saved from computer for potential supplemental production and brief review of contents.	1.5	
3/6/2024	DLE	Save and circulate letters from opposing counsel.	0.2	
3/7/2024	GCG	Conf w/ JSY re letter briefs and inspections.	0.2	
3/7/2024	GCG	Emails to AX, BBK and team re same.	0.1	
3/7/2024	JSY	Conf. w/ BBK re discovery issues and site inspections.	0.4	
3/7/2024	JSY	Emails re discovery issues.	0.1	
3/7/2024	JSY	Conf. w/ GCG re status.	0.2	
3/7/2024	BBK	Reviewing J. Bertino - M. Johnson emails re incomplete data for staffing experts; conferring w/ co-counsel re addressing same.	0.3	
3/7/2024	BBK	Meeting w/ JSY re inspections and discovery disputes.	0.3	
3/7/2024	BBK	Reviewing/commenting on M. Johnson draft meet and confer letter re supplemental ESI and doc production.	0.3	
3/7/2024	BBK	Emailing w/ KES re preparing exhibits for and filing two letter briefs; reviewing/approving same.	0.7	
3/7/2024	BBK	Conferring w/ KES re potential need to file exhibits to letter briefs under seal and addressing same.	0.3	
3/7/2024	BBK	Analyzing prior sealing motions and orders.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/7/2024	BBK	Emails w/ RBGG team re analyzing B. Jestrabek-Hart emails for responsiveness/privilege for supp doc prod; reviewing AX email report re Brookhurst inspection.	0.1	
3/7/2024	BBK	Drafting/sending recommendations to co-counsel re potential final compromise proposals for two disputes over production of class lists.	0.4	
3/7/2024	AHS	Reviewed emails re: discovery letter briefs and document extraction of named pl.	0.6	
3/7/2024	AX	(Reduced Charge) Travel to and from Brookdale Brookhurst facility from home in Los Angeles.	1.4	1.4
3/7/2024	AX	Attend ADA access barrier inspection of Brookdale Brookhurst.	8.7	
3/7/2024	KES	Prepare exhibits for discovery letter briefs; review draft briefs re same; investigate potential confidentiality issues re same.	2.5	
3/7/2024	KES	Troubleshoot client computer files and email AS re emails.	0.3	
3/7/2024	KES	Email AS re sample privilege log.	0.2	
3/7/2024	KES	Finalize and send follow up letters to subpoenaed declarants with copies of filed declarations.	0.6	
3/7/2024	KES	Follow up re status of service of subpoena.	0.1	
3/7/2024	KES	Follow up re status of depositions.	0.2	
3/7/2024	DLE	Circulate notification for upcoming meet and confer with defendants.	0.1	
3/8/2024	GCG	Prepare for and conduct team meeting w/ SW re inspections, depositions and letter briefs.	0.7	
3/8/2024	GCG	Follow up meeting w/ RBGG re urgent issues in the week ahead.	0.3	
3/8/2024	GCG	Conf w/ AX re expert on transportation issues and upcoming inspection.	0.2	
3/8/2024	GCG	Emails to JSY and GW re need for analysis re staffing.	0.1	
3/8/2024	JSY	Emails re discovery issues and depositions.	0.1	
3/8/2024	BBK	Emailing w/ co-counsel re final compromise proposals for disputes over production of class lists.	0.1	
3/8/2024	BBK	Reviewing AX update re status of scheduling/subpoenaing happy camper resident-declarants for deposition.	0.1	
3/8/2024	BBK	Preparing for meet and confer w/ opposing counsel over discovery disputes.	0.2	
3/8/2024	BBK	Meet and confer w/ opposing counsel over discovery disputes.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/8/2024	BBK	Drafting Pls' final compromise offer section of letter brief and emailing w/ cocounsel re approach to finalizing two letter briefs re class lists.	0.5	
3/8/2024	BBK	Revising letter brief on transportation class list per M. Johnson comments and drafting/sending email to Ds w/ final version of same.	0.3	
3/8/2024	BBK	Emailing w/ opposing counsel re finalizing/filing letter brief re transportation class list and re: Pls' compromise offer on dispute re putative facility-specific subclass lists.	0.1	
3/8/2024	BBK	Emailing w/ KES re finalizing/filing letter brief re transportation class list w/ exhibits; reviewing/approving same.	0.2	
3/8/2024	BBK	Reviewing R. Steyer - J. Bertino emails confirming Ds will not call resident-declarant as witness who they represent has dementia.	0.1	
3/8/2024	BBK	Preparing notes from meet and confer and sharing same w/ RBGG team.	0.3	
3/8/2024	BBK	Reviewing M. Johnson - J. Bertino emails re supp prod of data for staffing experts; M. Johnson follow-up emails to opposing counsel after meet and confer.	0.2	
3/8/2024	BBK	Emailing w/ RBGG team re happy camper declarant depositions and 30(b)(6) deposition.	0.1	
3/8/2024	BBK	Emailing w/ RBGG team and co-counsel re attorney memos from inspections.	0.1	
3/8/2024	AHS	Reviewed proposed strategy for M&C and update on depositions of Defs' potential witnesses.	0.3	
3/8/2024	AHS	Reviewed documents of named plf for discovery production.	0.6	
3/8/2024	AHS	Updated list of ongoing projects and status of discovery briefs and disputes, and added upcoming depos to calendar.	1.0	
3/8/2024	AHS	Call with KS and emailed with litigation vendor re: document production for named plf.	0.3	
3/8/2024	AHS	Call with co-counsel and GCG, DLE, KS, AX, BBK to discuss upcoming discovery tasks and deadlines.	1.0	
3/8/2024	AHS	Coordinated with DLE and co-counsel re: PRA responses.	0.1	
3/8/2024	AX	Brookdale team meeting with cocounsel and RBGG team only re case tasks, outstanding discovery issues, facility inspections, depositions, etc.	1.1	
3/8/2024	AX	Draft memo to team re Brookhurst inspection.	1.6	
3/8/2024	AX	Emails with team re happy camper depositions, FSP expert search.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/8/2024	AX	Call with declarant from Brookdale Alhambra and follow up with RS after.	0.4	
3/8/2024	AX	Call with Kelli Zahner re deposition and follow up.	0.3	
3/8/2024	KES	Emails with team re flash drive from client and follow up re issues with document folders.	0.7	
3/8/2024	KES	Team Zoom with co-counsel re case status, discovery and depositions.	0.8	
3/8/2024	KES	Confirm service of subpoena, prepare and service NOD for Kelli Zahner.	0.8	
3/8/2024	KES	Confirm depo dates and times and schedule court reporter for declarant depos.	0.7	
3/8/2024	KES	Emails with M. Johnson re 30b6 depo logistics and court reporter.	0.3	
3/8/2024	KES	Review, finalize and efile discovery letter brief.	0.5	
3/8/2024	DLE	Weekly co-counsel team meeting re case issues.	0.9	
3/8/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.3	
3/8/2024	DLE	Save and circulate PRA re transit policies and circulate scheduled meet and confer with defendants.	0.3	
3/9/2024	GCG	Research re Brookdale Background for trial.	0.1	
3/11/2024	GCG	Conf w/ JSY and emails to ER and MJ re ESI and other discovery issues.	0.2	
3/11/2024	BBK	Reviewing M. Johnson - opposing counsel emails re: ESI search terms and custodians disputes and dispute over supplementing interrogatory requesting names of EDs at BD facilities.	0.2	
3/11/2024	BBK	Reviewing AX and R. Steyer memos re inspections of BD Brookhurst and BD Tracy.	0.2	
3/11/2024	BBK	Drafting memo re inspection of former BD Fountaingrove.	2.1	
3/11/2024	BBK	Reviewing T. Close report re updated status of BD's ownership/operation of CA facilities.	0.1	
3/11/2024	BBK	Reviewing AX and KES reports re scheduling/noticing resident-declarant depositions.	0.2	
3/11/2024	BBK	Reviewing M. Johnson draft letter brief seeking production of benchmarks formula.	0.2	
3/11/2024	BBK	Reviewing M. Jacobsen email re using e-discovery vendor to obtain named plaintiffs' text messages for supplemental doc production.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 837

SERVICES

Date	Person	Description of Services	Hours	Discount
3/11/2024	AHS	Emailed with discovery vendor and KS and talked to named plf about extracting documents for production.	1.0	
3/11/2024	AHS	Emails re: discovery briefs and upcoming depositions.	0.4	
3/11/2024	AHS	Met with DLE and emailed with her, KS, and external discovery vendor to discuss document production for named plf.	0.7	
3/11/2024	AHS	Call with named plf re emails for document production.	0.3	
3/11/2024	AHS	Call with discovery vendor and named plaintiff to coordinate and troubleshoot document extraction phone email account.	1.0	
3/11/2024	AX	Emails with team re happy camper depositions; review voicemails re same.	0.5	
3/11/2024	KES	Research new depo location for Zahner; email AX re same; draft, finalize and serve amended NOD re same.	2.3	
3/11/2024	KES	Emails DE re discovery letter brief chambers copy.	0.2	
3/11/2024	KES	Emails and calls with DE and team re Jestrabek-Hart computer files and troubleshoot inaccessible files.	0.8	
3/11/2024	KES	Emails with T. Close re transit policy documents; download and organize documents gathered by co-counsel.	0.6	
3/11/2024	KES	Review and organize T. Close updated facilities memo.	0.2	
3/11/2024	KES	Emails with team re status of depos.	0.2	
3/11/2024	DLE	Call with representative at United Litigation to extract named plaintiff emails.	0.4	
3/11/2024	DLE	Confer with AHS re tasks related to extracting named plaintiff emails.	0.4	
3/11/2024	DLE	Prepare, compile, and send chambers copy of letter brief to magistrate judge; organize messenger service pickup.	1.5	
3/11/2024	DLE	Sort through named plaintiff email for relevant documents; extract and send to AHS.	0.8	
3/11/2024	DLE	Save documents produced by defendants related to PRA responses/transit policies to internal folder.	0.2	
3/11/2024	DLE	Save memo from Tracy inspection to internal folder and circulate.	0.1	
3/11/2024	DLE	Confer with KES re extracting emails from flash drive for named plaintiff.	0.2	
3/12/2024	GCG	Conf w/ BBK re meet and confer.	0.1	
3/12/2024	GCG	Research and draft email to GW re potential expert work on staffing analysis.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2024	JSY	Emails re Happy Camper depo prep.	0.2	
3/12/2024	JSY	Emails re meet and confer.	0.1	
3/12/2024	BBK	Emailing w/ RBGG team re plan for meet and confer w/ opposing counsel and letter brief re: dispute over production of putative facility-specific class lists.	0.2	
3/12/2024	BBK	Emailing w/ RBGG team re preparing for depositions of resident-declarants.	0.2	
3/12/2024	BBK	Preparing for meet and confer w/ Ds re discovery disputes.	0.3	
3/12/2024	BBK	Participating in meet and confer w/ Ds re discovery disputes.	1.3	
3/12/2024	BBK	Debriefing w/ G. Wallace, M. Johnson and R. Steyer re meet and confer w/ Ds re discovery disputes.	0.5	
3/12/2024	BBK	Conferring w/ GCG re Pls' position re: Ds' proposed compromise on putative class lists.	0.1	
3/12/2024	BBK	Meeting w/ KES re status of discovery disputes and depositions.	0.2	
3/12/2024	BBK	Drafting/sending update to RBGG team re meet and confer.	0.2	
3/12/2024	BBK	Drafting/sending email to opposing counsel accepting proposed compromise re: class lists for putative facility-specific classes.	0.2	
3/12/2024	BBK	Emailing w/ AHS re intakes from BD residents.	0.1	
3/12/2024	BBK	Emailing w/ AX re deposition of recent ED of Scotts Valley.	0.2	
3/12/2024	BBK	Emailing w/ M Johnson and KES re deposition of current ED of San Ramon.	0.2	
3/12/2024	BBK	Emailing w/ AX, KES and R. Steyer re moving dates of declarant-resident depositions and noticing and informing Ds' of changes to same.	0.2	
3/12/2024	AHS	Emailed with discovery vendor re: document extraction.	0.1	
3/12/2024	AHS	Connected with named plaintiff and discovery vendor to do additional document extraction for discovery.	0.4	
3/12/2024	AHS	Emailed with BBK AX JY re: meet and confer and re upcoming depositions.	0.3	
3/12/2024	AHS	Talked to KS and KC re: Brookdale depositions and relevant caselaw from GCG.	0.3	
3/12/2024	AHS	Call with AX re: upcoming expert inspections, depositions, and document production.	0.3	
3/12/2024	AHS	Organized to-do list and next steps for case tasks this week.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 839

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2024	AHS	Reviewed emails re meet and confer and upcoming depositions.	0.1	
3/12/2024	AHS	Responded to intake from Brookdale resident's family member.	0.1	
3/12/2024	AHS	Emailed GCG re relevant case.	0.1	
3/12/2024	AX	Communications with opposing counsel and expert re Brookdale Hemet facility inspection.	0.5	
3/12/2024	AX	Prepare for Hemet inspection, including reviewing prior expert reports and other materials.	0.8	
3/12/2024	AX	Prep for and conduct call with AS re interrogatory responses and other case tasks.	0.3	
3/12/2024	KES	Update office space bookings and cancellations for in person depositions; emails with team re same.	1.4	
3/12/2024	KES	Calendar updated deposition dates.	0.3	
3/12/2024	KES	Prepare and serve amended NOD for Zahner; emails with AX re same; draft cover letter with amended subpoena for deponent.	1.2	
3/12/2024	KES	Review and update depo status chart.	0.2	
3/12/2024	KES	Emails with court reporter re changes to deposition dates.	0.2	
3/13/2024	GCG	Review emails to BBK, MJ, AX and ER re inspection and deposition issues.	0.2	
3/13/2024	JSY	Emails re meeting re ESI supplementation.	0.1	
3/13/2024	BBK	Conferring w/ co-counsel and JSY re responding to Ds' clarification re: proposed compromise on putative class lists; drafting/sending email to E. Rutner re same.	0.2	
3/13/2024	BBK	Conferring w/ AX and co-counsel re BD Brookhurst inspection.	0.2	
3/13/2024	BBK	Emailing w/ RBGG team re status of supplemental doc productions for B. Jestrabek-Hart.	0.1	
3/13/2024	BBK	Reviewing M. Johnson emails to opposing counsel confirming agreement to compromise on supplementation of Carlson Rog Responses IDing EDs and re: deposition of San Ramon ED.	0.1	
3/13/2024	BBK	Emailing w/ KES and R. Steyer re approach for postponing 3/18 resident-declarant deposition and notifying Ds re same.	0.2	
3/13/2024	BBK	Reviewing/revising R. Steyer draft email to opposing counsel re postponing 3/18 resident-declarant deposition.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 840

SERVICES

Date	Person	Description of Services	Hours	Discount
3/13/2024	BBK	Reviewing Ds' letter re supplementation of ESI and other docs; emailing w/ GCG/JSY re addressing same.	0.3	
3/13/2024	BBK	Reviewing M. Johnson emails to Ds re San Ramon ED deposition and internal emails re same.	0.1	
3/13/2024	BBK	Meeting w/ KES re depositions and Ds' supplemental ESI productions.	0.3	
3/13/2024	BBK	Emailing w/ JSY/GCG re meeting w/ co-counsel re strategy for addressing Ds' position on supplementing ESI and on depositions of EDs.	0.2	
3/13/2024	BBK	Emailing G. Wallace and M. Johnson re meeting on strategy for addressing Ds' position on supplementing ESI and on depositions of EDs.	0.2	
3/13/2024	AHS	Communicated with named pl and discovery vendor re document extraction and access to discovery databases.	1.4	
3/13/2024	AHS	Reviewed emails re: facility inspection and discovery dispute status after 3/12 meet and confer.	0.4	
3/13/2024	AHS	Reviewed team emails re discovery proposed compromises.	0.4	
3/13/2024	AX	(Reduced Charge) Travel time from home in LA to Hemet and back home for Brookdale access inspection.	2.6	2.6
3/13/2024	AX	Brookdale access inspection of Pacifica Hemet (8:30 AM to 4:45 PM).	8.3	
3/13/2024	KES	Emails with R. Bonner re Relativity access for new team members and tags for upcoming client doc review; review Relativity tags re same.	0.3	
3/13/2024	KES	Conduct Relativity search for Kaufeldt docs for depo and brief overview of same; email AS re same.	0.7	
3/13/2024	KES	Emails with team and co-counsel re changes to deposition dates and deponents.	0.4	
3/13/2024	KES	Brief Relativity search and review re documents relevant to deponent Dimple Kamdar; email team re same.	0.6	
3/13/2024	KES	Email and confer AS and R. Bonner re client docs to be uploaded to Relativity and filtering issues.	0.7	
3/13/2024	DLE	Set up account in document tracking database for upcoming document review, notify KES.	0.5	
3/14/2024	GCG	Meet w/ co-counsel team to discuss depositions, inspections and expert reports.	1.2	
3/14/2024	JSY	Meeting with AX, BBK, AS re prep for declarant depositions.	1.0	
3/14/2024	JSY	Team meeting.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/14/2024	BBK	Reviewing E. Rutner emails re Pls' position on ESI supplementation and ED depositions.	0.1	
3/14/2024	BBK	Reviewing E. Rutner-M. Jacobsen emails re Ds' forthcoming objections to 30(b)(6) depo notice.	0.1	
3/14/2024	BBK	Emailing w/ KES re ESI production rec'd on 3/13.	0.1	
3/14/2024	BBK	Emailing w/ co-counsel and JSY re strategy for ED depositions and addressing Ds' position on supplementation of ESI and docs.	0.2	
3/14/2024	BBK	Reviewing sample resident-declarant deposition outline in prep for meeting w/ RBGG team.	0.2	
3/14/2024	BBK	Meeting w/ JSY, AHS, and AX re upcoming depositions and supplementing Pls' discovery responses.	0.9	
3/14/2024	BBK	Emailing w/ KES and co-counsel re contents of supp ESI production.	0.2	
3/14/2024	BBK	Conferring w/ AX and JSY re deposition of former Scotts Valley ED Kamdar.	0.2	
3/14/2024	BBK	Preparing for meeting w/ co-counsel re addressing Ds' position on supplementation of docs and ESI and plan for upcoming depositions.	0.2	
3/14/2024	BBK	Meeting w/ co-counsel re addressing Ds' position on supplementation of docs and ESI; depositions; and expert work.	1.2	
3/14/2024	BBK	Post-co-counsel meeting emails w/ AX re Kamdar deposition.	0.1	
3/14/2024	BBK	Emailing w/ R. Steyer re notifying Ds re postponing resident-declarant deposition on 3/18.	0.1	
3/14/2024	BBK	Emailing w/ KES and AX re identifying Kamdar's location for purpose of noticing deposition.	0.2	
3/14/2024	BBK	Emailing w/ KES re Feister deposition.	0.1	
3/14/2024	BBK	Reviewing/commenting on M. Johnson draft email to Ds re supp doc production and depositions of Kamdar, Feister and Johnson.	0.2	
3/14/2024	BBK	Emailing w/ M. Johnson re subpoenaing former San Ramon ED for deposition.	0.1	
3/14/2024	AHS	Prepared for deposition by reviewing materials regarding deponent.	0.8	
3/14/2024	AHS	Call with JY, BBK, AX re upcoming depositions and inspections.	1.0	
3/14/2024	AHS	Met with KS about Relativity and document production.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 842

SERVICES

Date	Person	Description of Services	Hours	Discount
3/14/2024	AX	Emails re scheduling happy camper depositions.	0.3	
3/14/2024	AX	Meeting with JSY, BBK, AS re preparing for happy camper deposition.	1.0	
3/14/2024	AX	Meeting with GW, MJ, GCG, JSY, BBK, TC re ED depositions.	1.0	
3/14/2024	AX	(Billing Judgment) Emails with RB re Relativity access.	0.0	0.2
3/14/2024	AX	Emails re Dimple Kamdar deposition.	0.4	
3/14/2024	KES	Preparation and arrangement for Happy Camper deposition.	3.0	
3/14/2024	KES	Emails with team re status of Kamdar and Feaster depos and Westlaw research re deponent location.	0.7	
3/14/2024	KES	Brief review of documents for deponent Beaty and email AS re same.	0.8	
3/14/2024	KES	Follow up re client documents for upload to Relativity.	0.2	
3/14/2024	KES	Download BKD production and brief review of images prior to Relativity upload.	0.5	
3/15/2024	GCG	Conf w/ JSY re issues raised by 30(b)(6) deposition.	0.1	
3/15/2024	JSY	Messages and emails re 30(b)(6) deposition.	0.4	
3/15/2024	JSY	Conf. w/ GCG re deposition and expert issues.	0.2	
3/15/2024	BBK	Emailing w/ KES re locating/subpoenaing former EDs of Scotts Valley and San Ramon for depositions in April.	0.2	
3/15/2024	BBK	Conferring w/ AHS re updating case task list.	0.1	
3/15/2024	BBK	Reviewing M. Johnson - J. Bertino emails re location of 30(b)(6) deposition; conferring w/ JSY and M . Johnson re same.	0.5	
3/15/2024	BBK	Phone call w/ KES re status of potential deposition of San Ramon ED Feaster on 3/20.	0.3	
3/15/2024	BBK	Emailing w/ KES, court reporter service, and M. Johnson re potential deposition of San Ramon ED Feaster on 3/20.	0.3	
3/15/2024	BBK	Updating case task list.	1.1	
3/15/2024	BBK	Reviewing M. Johnson - J. Bertino emails re producing omitted staffing data.	0.1	
3/15/2024	BBK	Conferring w/ AHS re preparing for depositions of resident-declarants.	0.1	
3/15/2024	AHS	Reviewed transcripts from resident depositions taken earlier in case.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/15/2024	AHS	Reviewed emails re depositions and discussed them with JY and BBK.	0.2	
3/15/2024	KES	WL research re potential addresses for potential deponents Omole and Kumar.	1.3	
3/15/2024	KES	Emails with court reporter and M. Johnson re potential date for Feaster depo.	0.6	
3/15/2024	KES	Emails with team and court reporter re Johnson depo logistics.	0.4	
3/15/2024	KES	Follow up re status of Williams depo.	0.1	
3/17/2024	AHS	Drafted outline for deposition of Diana Kaufeldt.	1.4	
3/17/2024	AHS	Prepared for ED/ HWD depos.	1.5	
3/18/2024	JSY	Conf. w/ GCG re deposition outline for happy camper declarants.	0.1	
3/18/2024	JSY	Conf. w/ BBK re deposition issues.	0.3	
3/18/2024	JSY	Meeting with AHS re deposition prep for happy camper depositions.	0.8	
3/18/2024	JSY	Edit deposition outline; emails re same.	0.6	
3/18/2024	BBK	Emailing w/ AX, KES and R. Steyer re resident-declarant depositions.	0.2	
3/18/2024	BBK	Emailing w/ team re: noticing 3/28 deposition of former Scotts Valley ED Kamdar.	0.1	
3/18/2024	BBK	Emailing w/ co-counsel and RBGG team re preparing deposition subpoenas for Scotts Valley and San Ramon EDs no longer employed by BD and timing of same.	0.2	
3/18/2024	BBK	Reviewing M. Johnson - M. Jacobsen emails re supplementing Stiner doc productions.	0.1	
3/18/2024	BBK	Conferring w/ co-counsel and KES re locating potential witness for trial formerly employed by BD.	0.1	
3/18/2024	BBK	Phone call w/ JSY re preparing for resident-declarant depositions.	0.2	
3/18/2024	BBK	Reviewing Ds' responses to M. Johnson email re: supplemental ESI production and depositions of Johnson, Feaster, and Kamdar; reporting on same to team.	0.1	
3/18/2024	BBK	Reviewing AHS emails w/ JSY and co-counsel re outline for resident-declarant depositions.	0.2	
3/18/2024	AHS	Emailed AX and KS re: depo and inspection prep.	0.3	
3/18/2024	AHS	Worked on outline for deposition of Diana Kaufeldt.	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/18/2024	AHS	Reviewed documents for deposition of John Beaty.	0.8	
3/18/2024	AHS	Call with JY re: depositions of Diana Kaufeldt and John Beaty.	0.8	
3/18/2024	AHS	Organized and reviewed documents pertaining to Kaufeldt and Beaty.	0.2	
3/18/2024	AHS	Pulled and reviewed materials for expert inspection on 3/21.	0.6	
3/18/2024	AX	Emails with opposing counsel re Kenneth Joyce deposition.	0.2	
3/18/2024	AX	Emails with AS re facility inspections.	0.5	
3/18/2024	AX	Emails with team re happy camper depositions.	0.4	
3/18/2024	KES	WL research re address for former Brookdale employee.	0.3	
3/18/2024	KES	Cancel court reporter and room for Deponent Joyce.	0.4	
3/18/2024	KES	Review emails and calendar Johnson and Kamdar depos.	0.2	
3/18/2024	KES	Emails with court reporter and team confirming Beaty and Kaufeldt depos.	0.2	
3/18/2024	KES	Review and organize documents for potential Beaty and Kaufeldt depo exhibits.	2.7	
3/19/2024	JSY	Messages and emails re depo outline for declarants.	0.3	
3/19/2024	JSY	Review ROG responses and comments re supplementing same.	0.4	
3/19/2024	JSY	Work on suppl. JA ROG responses.	0.7	
3/19/2024	BBK	Conferring w/ AHS re prep for resident-declarant depositions.	0.1	
3/19/2024	BBK	Conferring w/ AX and JSY re plan for supplemental interrogatory responses re: barriers encounter by named plaintiffs.	0.2	
3/19/2024	BBK	Emailing w/ AHS, JSY and co-counsel re resident-declarant deposition outlines.	0.2	
3/19/2024	BBK	Reviewing AHS resident-declarant deposition outlines in prep for depo prep meeting.	0.3	
3/19/2024	BBK	Meeting w/ AHS re preparing for resident-declarant depositions.	0.8	
3/19/2024	BBK	Reviewing B. Umpierre letter to Ds' re incomplete production of staffing-related data.	0.1	
3/19/2024	BBK	Reviewing GW draft pls' portion of letter brief re supplementation of documents and ESI.	0.2	
3/19/2024	BBK	Conferring w/ KES re deposition subpoenas to former BD employees who were EDs at Scotts Valley and San Ramon.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 845

SERVICES

Date	Person	Description of Services	Hours	Discount
3/19/2024	AHS	Downloaded and reviewed relevant memos in preparation for Scotts Valley expert inspection on 3/21.	0.7	
3/19/2024	AHS	Updated deposition outlines for Kaufeldt and Beaty.	1.4	
3/19/2024	AHS	Talked to KS re: preparing depo binders and materials.	0.3	
3/19/2024	AHS	Met with BBK to discuss depos.	0.8	
3/19/2024	AHS	Emailed with KS and DLE re tomorrow' depositions.	0.3	
3/19/2024	AHS	Incorporated edits from BBK and co-counsel into depo outlines.	0.3	
3/19/2024	AHS	Emailed opposing counsel and our expert to confirm details for inspection of Brookdale Scotts Valley.	0.3	
3/19/2024	AHS	Talked to named plaintiff re meeting with her this week and sent follow up email to discovery vendor.	0.3	
3/19/2024	AHS	(Reduced Charge) Travel from SF to Santa Cruz for depositions and inspection.	1.0	1.0
3/19/2024	AHS	Reviewed deposition outlines.	0.7	
3/19/2024	AX	Organize Bernie Jestrabek-Hart documents.	0.4	
3/19/2024	AX	Draft memo re Hemet inspection and circulate to team.	2.5	
3/19/2024	AX	Emails re happy camper depositions.	0.2	
3/19/2024	KES	Emails and tcs re logistics for March 20 depositions in Santa Cruz.	0.7	
3/19/2024	KES	Gather and prepare exhibits for March 20 depositions.	3.2	
3/19/2024	KES	Emails with R. Bonner and discovery vendor re client emails and documents.	0.5	
3/19/2024	KES	Draft subpoena for Ann Wahl and email AX re same.	0.3	
3/19/2024	KES	Brief review of documents in Relativity related to deponents Kumar and Omole.	1.3	
3/19/2024	DLE	Prep for AHS depositions.	0.2	
3/20/2024	GCG	Conf w/ GW re expert reports and trial preparation plan.	0.5	
3/20/2024	GCG	Conf w/ and emails to JSY re discovery issues.	0.3	
3/20/2024	GCG	Review letters from JB and GW re inspection of San Ramon.	0.2	
3/20/2024	JSY	Conf. w/ BBK re depo prep.	0.1	
3/20/2024	JSY	Conf. w/ GCG re strategy for next steps and depo issues; messages re same.	0.4	
3/20/2024	BBK	Reviewing AX memo re inspection of BD Hemet facility.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/20/2024	BBK	Reviewing comm'ns w/ opposing counsel re BD Scotts Valley inspection logistics.	0.1	
3/20/2024	BBK	Analyzing/commenting on Ds' objections to 30(b)(6) deposition notice.	0.2	
3/20/2024	BBK	Phone call w/ JSY re AHS depo prep for resident-declarant depositions.	0.2	
3/20/2024	BBK	Drafting/sending email proposal to team re plan for depositions of EDs no longer employed by BD.	0.3	
3/20/2024	BBK	Reviewing M. Johnson and G. Wallace responses to proposed plan for depositions of EDs no longer employed by BD; conferring w/ RBGG team re same.	0.3	
3/20/2024	BBK	Emailing w/ M. Johnson and G. Wallace depositions of EDs no longer employed by BD and demanding supplemental ESI for same.	0.3	
3/20/2024	BBK	Reviewing/commenting on G. Wallace drat letter to Ds re communications w/ members of certified class; conferring w/ AX re further comments on same.	0.2	
3/20/2024	BBK	Reviewing M. Johnson emails w/ opposing counsel re delay in supp ESI production for 30b6 deposition and rescheduling same ILO this; and re Pls' portion of letter brief on supp ESI and docs.	0.2	
3/20/2024	BBK	Debriefing w/ AHS re resident-declarant depositions (w/ AX and JSY) and comm'ns re Scotts Valley resident council meeting.	0.3	
3/20/2024	BBK	Reviewing AX-J. Bertino emails re location of 3/28 deposition of Kamdar.	0.1	
3/20/2024	BBK	Reviewing Ds' letter re conduct at San Ramon inspection and G. Wallace response letter; conferring w/ RBGG team re same.	0.3	
3/20/2024	AHS	(Reduced Charge) Traveled to deposition of Brookdale resident and declarant Diana Kaufeldt.	0.5	0.5
3/20/2024	AHS	Lunch break and prepped for deposition of Brookdale resident John Beaty.	1.4	
3/20/2024	AHS	Took deposition of Brookdale resident John Beaty.	0.8	
3/20/2024	AHS	Reviewed emails from team re: inspection and upcoming depositions.	0.3	
3/20/2024	AHS	Reviewed previously filed expert report of Brookdale Scotts Valley.	0.8	
3/20/2024	AHS	Communicated with JY BBK and AX re class member depositions and expert inspection of Scotts Valley.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 847

SERVICES

Date	Person	Description of Services	Hours	Discount
3/20/2024	AHS	Took deposition of Brookdale resident and declarant Diana Kaufeldt.	2.3	
3/20/2024	AX	Review letter re Defs communications with class members and email correspondence with team re same.	0.5	
3/20/2024	AX	Emails with DE, KES re document review for Dimple Kamdar deposition; emails and calls re same.	1.2	
3/20/2024	AX	Document review and revise Dimple Kamdar deposition outline.	3.2	
3/20/2024	KES	Draft and serve amended NOD of Luana Williams; draft and send cover letter to deponent re amended subpoena.	0.7	
3/20/2024	KES	Review docs and create saved searches re Dimple Kamdar in preparation for depo.	3.2	
3/20/2024	DLE	Save and circulate Defs' objections to depo notice.	0.2	
3/20/2024	DLE	Meeting with AX and KES re instructions for ED document review.	0.5	
3/20/2024	DLE	Meeting with KES re follow-up training on ED document review.	0.5	
3/20/2024	DLE	Document review of 10 ED emails; navigate document review software.	0.4	
3/21/2024	GCG	Conf w/ JSY re deposition and inspection.	0.3	
3/21/2024	JSY	Emails and messages re site inspection.	0.1	
3/21/2024	JSY	Review letter re defense communications re class members.	0.1	
3/21/2024	JSY	Edit supplemental ROG responses.	0.4	
3/21/2024	JSY	Conf. w/ GCG re status of discovery and other priorities.	0.2	
3/21/2024	JSY	Messages re inspection.	0.1	
3/21/2024	BBK	Emailing w/ AHS and G. Wallace re Scotts Valley inspection.	0.2	
3/21/2024	BBK	Reviewing further emails w/ opposing counsel re 30(b)(6) deposition rescheduling ILO Ds' delay in producing promised supp ESI.	0.2	
3/21/2024	BBK	Emailing w/ M. Johnson re subpoenaing former EDs of Scotts Valley and San Ramon for deposition.	0.2	
3/21/2024	BBK	Emailing w/ KES re preparing deposition subpoena for B. Kumar and plan to execute service of same.	0.2	
3/21/2024	BBK	Reviewing/approving draft deposition subpoena for B. Kumar.	0.1	
3/21/2024	BBK	Reviewing further emails w/ opposing counsel re Pls' portion of letter brief seeking to compel supplemental document and ESI productions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/21/2024	BBK	Reviewing/responding to G. Wallace query re status of pending motions before MJ Beeler.	0.2	
3/21/2024	BBK	Emailing w/ co-counsel re FU w/ opposing counsel re outstanding production of names and contact info for current residents of BD Brookhurst, San Ramon, Scotts Valley and Tracy; drafting/sending email to opposing counsel re same.	0.2	
3/21/2024	BBK	Emailing w/ co-counsel and AX re noticing deposition of D. Kamdar for 3/28 and length of deposition.	0.2	
3/21/2024	BBK	Conferring w/ AX re plan for 3/28 deposition of Kamdar.	0.2	
3/21/2024	BBK	Conferring w/ AHS re inspection of accessible van during Scotts Valley inspection.	0.2	
3/21/2024	AHS	Attended Jeff Mastin's expert inspection of Brookdale Scotts Valley.	8.2	
3/21/2024	AHS	Lunch and discussed morning of inspection of Brookdale Scotts Valley with Jeff Mastin.	0.9	
3/21/2024	AHS	(Reduced Charge) Travel from Scotts Valley back to SF.	0.9	0.8
3/21/2024	AHS	(Reduced Charge) Traveled to Brookdale Scotts Valley.	0.1	0.2
3/21/2024	AHS	Spoke with expert Jeff Mastin after inspection of Brookdale Scotts Valley concluded.	0.2	
3/21/2024	AHS	Meet with named plaintiff.	1.5	
3/21/2024	AX	Emails to JSY, GCG re Dimple Kamdar deposition.	0.3	
3/21/2024	AX	Document review in preparation for Dimple Kamdar deposition; draft deposition outline and emails to team re same.	2.2	
3/21/2024	KES	Draft, finalize and serve NOD re Kamdar.	0.4	
3/21/2024	KES	Draft subpoena re Beena Kumar and emails with team re date and location.	0.4	
3/21/2024	KES	Scheduled court reporter for Luana Williams depo.	0.2	
3/21/2024	KES	Review Kamdar docs for potential use as depo exhibits.	1.3	
3/21/2024	DLE	Discuss ED email document review with KES.	0.3	
3/21/2024	DLE	Document review of 400 ED emails; indicate for relevancy and attorney review.	2.9	
3/21/2024	DLE	Update AX on status of document review.	0.1	
3/21/2024	DLE	Save and circulate recent letters exchanged with opposing counsel.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/22/2024	GCG	Meet w/ SW to discuss depositions, inspections and expert reports.	1.3	
3/22/2024	GCG	Conf w/ AX re expert on forced transfer and Kamdar deposition.	0.2	
3/22/2024	GCG	Conf w/ JSY re meeting w/ potential expert.	0.2	
3/22/2024	GCG	Emails to MJ and team re discovery disputes.	0.2	
3/22/2024	JSY	Team meeting.	1.0	
3/22/2024	JSY	Call with potential expert.	0.3	
3/22/2024	JSY	Multiple conf. and emails re meeting with medical expert.	0.5	
3/22/2024	BBK	Reviewing/responding to J. Bertino email re timing of Ds' production of putative class list for facility-specific access barrier classes.	0.1	
3/22/2024	BBK	Reviewing J. Bertino - R. Steyer emails re 3/25 resident-declarant deposition.	0.1	
3/22/2024	BBK	Reviewing J. Bertino - M. Johnson emails re postponing 30(b)(6) deposition.	0.2	
3/22/2024	BBK	Meeting w/ co-counsel re: expert disclosures, depositions, and discovery disputes.	1.3	
3/22/2024	BBK	Emailing w/ KES re preparing/serving deposition subpoenas for two former Brookdale employees B. Kumar and A. Omole.	0.2	
3/22/2024	BBK	Reviewing JSY report re call w/ potential expert re safety issues due to mandatory transfers under Fleet Safety Policy; conferring w/ co-counsel and RBGG team re same.	0.2	
3/22/2024	BBK	Reviewing Pls' portion of letter brief to compel production of benchmark formula.	0.1	
3/22/2024	BBK	Reviewing post-co-counsel meeting emails re expert reports and depositions.	0.1	
3/22/2024	AHS	Discussed depositions and document review with DLE.	0.6	
3/22/2024	AHS	Updated KS and AX re: class member depos and Scotts Valley inspection.	0.4	
3/22/2024	AHS	Weekly call with co-counsel to discuss recent inspections and upcoming depositions and discovery work.	1.3	
3/22/2024	AX	Meeting with Brookdale team and cocounsel re case tasks and strategy issues.	1.3	
3/22/2024	AX	Meeting with GBW, MJ re Dimple Kamdar deposition strategy and topics.	0.7	
3/22/2024	AX	Meet with DE, KES re document review issues for Dimple Kamdar deposition.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/22/2024	AX	Emails re Dimple Kamdar deposition exhibits; revise deposition outline.	0.5	
3/22/2024	KES	Schedule court reporter for Kamdar depo.	0.2	
3/22/2024	KES	Emails with R. Steyer re Williams depo logistics.	0.4	
3/22/2024	KES	Finalize and arrange for service of Kumar and Omole subpoenas.	0.8	
3/22/2024	KES	Download and organize expert photos.	0.3	
3/22/2024	KES	Continue review of Kamdar documents for depo.	1.0	
3/22/2024	KES	Zoom meeting with co-counsel re discovery and case status.	1.0	
3/22/2024	DLE	Document review of 80 ED emails; indicate for relevancy and attorney review.	0.9	
3/22/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.3	
3/22/2024	DLE	Organize and circulate notes from weekly co-counsel meeting.	0.2	
3/22/2024	DLE	Meeting with AHS to discuss case tasks and site visits.	0.6	
3/22/2024	DLE	Confer with AX and KES re ED document review.	0.3	
3/24/2024	BBK	Reviewing M. Johnson draft stipulation re: expert disclosure deadline for experts re: lawfulness of Fleet Safety Policy.	0.1	
3/25/2024	JSY	Emails re meeting with expert.	0.1	
3/25/2024	JSY	Conf. w/ AX re depo of former ED of Scotts Valley.	0.2	
3/25/2024	JSY	Conf. w/ AS re depo observation.	0.1	
3/25/2024	BBK	Reviewing emails w/ opposing counsel re deposition of R. Stiner and re: deposition of Scotts Valley ED Kamdar.	0.1	
3/25/2024	BBK	Emailing w/ RBGG team and G. Wallace re addressing Ds' portion of letter brief re supplementing ESI and documents.	0.2	
3/25/2024	BBK	Conferring w/ GCG re notice of appearance by new opposing counsel; attending to conflicts check for same.	0.1	
3/25/2024	BBK	Reviewing G. Wallace memo re key topics/questions for ED depositions.	0.2	
3/25/2024	AHS	Wrote memo summarizing and memorializing the Brookdale Scotts Valley inspection with Jeff Mastin.	1.9	
3/25/2024	AHS	Spoke with AX about inspections and her upcoming deposition of Dimple Kamdar.	0.2	
3/25/2024	AX	Email communications with OC re Kamdar deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/25/2024	AX	Review GW outline and deposition topics and incorporate into outline draft.	1.2	
3/25/2024	AX	Review documents and prepare deposition outline.	4.0	
3/25/2024	KES	Download and circulate pleading.	0.1	
3/25/2024	KES	Review emails re depositions.	0.1	
3/26/2024	GCG	Conf w/ DM of Washington Post re Brookdale comments.	0.1	
3/26/2024	GCG	Email GW re same.	0.1	
3/26/2024	GCG	Email to GW and JSY re meeting w/ potential expert.	0.1	
3/26/2024	GCG	Email to BBK and RS re DSS citations.	0.1	
3/26/2024	JSY	Emails re new attorney.	0.1	
3/26/2024	JSY	Draft supplemental ROG responses; emails re same.	0.7	
3/26/2024	JSY	Emails re meeting with expert.	0.1	
3/26/2024	JSY	Edit supplemental ROG responses further.	0.4	
3/26/2024	BBK	Analyzing Ds' portion of letter brief re supplementation of ESI and documents and preparing response to argument re: facial challenge to FSP for reply portion of same.	0.8	
3/26/2024	BBK	Reviewing GCG update re Washington Post story on Brookdale case.	0.1	
3/26/2024	BBK	Emailing w/ co-counsel and team re approach to supplemental ROG responses re: barriers encountered by named Plaintiffs.	0.1	
3/26/2024	BBK	Emailing w/ R. Steyer re DSS citations to the BD facilities where named Plaintiffs live(d) since April 2022.	0.2	
3/26/2024	BBK	Reviewing AHS memo re BD Scotts Valley inspection.	0.2	
3/26/2024	BBK	Emailing w/ KES re comm'ns w/ process server re deposition subpoenas and w/ court reporter service re upcoming depositions.	0.2	
3/26/2024	BBK	Emailing w/ opposing counsel re: Kamdar and R. Stiner depositions; emailing w/ co-counsel re 3/25 resident-declarant deposition and scheduling remaining resident-declarant deposition.	0.3	
3/26/2024	BBK	Reviewing opposing counsel's proposed revisions to Stip to extend expert report and related deadlines.	0.1	
3/26/2024	BBK	Reviewing/analyzing Ds' portion of letter brief seeking to compel production of benchmark formula.	0.2	
3/26/2024	BBK	Emailing re: AX draft outline for Kamdar deposition.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/26/2024	AHS	Reviewed emails re: deposition of Dimple Kamdar and ESI information from Brookdale.	0.2	
3/26/2024	AHS	Reviewed and sent emails to team re recent and upcoming depositions.	0.6	
3/26/2024	AHS	Reviewed deposition outline for Dimple Kamdar depo.	0.4	
3/26/2024	AX	Email communications with team re happy camper depositions.	0.2	
3/26/2024	AX	Prepare deposition outline and review documents in relation to deposition.	5.7	
3/26/2024	AX	Emails with opposing counsel re deposition logistics.	0.3	
3/26/2024	KES	Additional review and download of Kamdar docs for potential use at depo.	2.5	
3/26/2024	KES	Emails with team re status and logistics of depositions; confirm depo with court reporter.	0.4	
3/26/2024	KES	Emails with R. Steyer re Wahl depo and reserve depo space.	0.4	
3/26/2024	DLE	Confer with KES re preparing exhibits for upcoming depositions.	0.1	
3/27/2024	GCG	Conf w/ JSY and AX re preparation for Dimple Kamdar deposition.	0.4	
3/27/2024	GCG	Review emails re same and re expert stipulation.	0.1	
3/27/2024	JSY	Conf. w/ GCG and AX re depo prep for ED depo; emails re same.	0.5	
3/27/2024	JSY	Conf. w/ AX re depo prep.	0.1	
3/27/2024	BBK	Reviewing emails w/ opposing counsel negotiating stipulation to extend expert disclosure/discovery deadlines w/r/t Fleet Safety Policy-related opinions only.	0.2	
3/27/2024	BBK	Reviewing emails w/ opposing counsel re: R. Stiner deposition; emails w/ co-counsel e happy camper depositions; and email from opposing counsel re production of missing data for staffing experts.	0.2	
3/27/2024	BBK	Conferring w/ RBGG team and co-counsel re AX draft outline and strategy for Kamdar deposition.	0.2	
3/27/2024	BBK	Reviewing emails w/ vendor re: pulling text messages for B. Jestrabek-Hart supp doc prod; emailing w/ KES re status of service of deposition subpoenas for former EDs of San Ramon and Scotts Valley.	0.1	
3/27/2024	BBK	Reviewing/revising AHS draft update to case task list.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/27/2024	BBK	Reviewing Pls' reply portion of letter brief seeking to compel supplemental production of docs and ESI.	0.1	
3/27/2024	AHS	Discussed Brookdale assignments with DLE, including deposition prep.	0.1	
3/27/2024	AHS	Reviewed notes re: named plaintiff's documents and corresponded with external discovery vendor.	0.7	
3/27/2024	AHS	Updated memo with notes from meeting with named plf.	0.4	
3/27/2024	AHS	Updated case tasks list.	1.0	
3/27/2024	AX	(Billing Judgment) Travel from Los Angeles to San Francisco.	0.0	3.5
3/27/2024	AX	Revise outline and prepare for deposition.	1.5	
3/27/2024	AX	Revise outline and prepare deposition exhibits.	2.5	
3/27/2024	AX	Communications with KES, DE re deposition exhibits and related doc review.	0.3	
3/27/2024	KES	Download and circulate pleading.	0.1	
3/27/2024	KES	Additional doc review for Kamdar depo.	1.4	
3/27/2024	KES	Prepare exhibits for Kamdar deposition.	2.5	
3/27/2024	DLE	Prepare folders of exhibit hard copies for upcoming deposition for AX.	1.2	
3/27/2024	DLE	Combine and finalize exhibits in digital folder for upcoming deposition.	0.4	
3/28/2024	GCG	Confs w/ and email to DM of Washington Post re under-staffing at California facilities.	0.7	
3/28/2024	GCG	Confs w/ AX and AS re Kamdar deposition.	0.5	
3/28/2024	GCG	Meet w/ JB and DK re deposition.	0.1	
3/28/2024	GCG	Prepare for and conduct interview of potential expert w/ GW.	0.7	
3/28/2024	GCG	Follow up emails w/ KES and team re research on and retention of expert for fleet safety issues.	0.5	
3/28/2024	GCG	Review stipulation and order re Johnson deposition and expert disclosure.	0.1	
3/28/2024	JSY	Conf. w/ GCG re information from Defs' class cert opposition; research re same.	0.5	
3/28/2024	JSY	Emails re meeting with potential expert and photos of vans.	0.2	
3/28/2024	BBK	Conferring w/ JSY re materials for Washington Post reporter for story on case.	0.1	
3/28/2024	BBK	Conferring w/ AX re plan for Kamdar deposition.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/28/2024	BBK	Reviewing updates from process server re: status of attempting service of deposition subpoena on two BD former employees.	0.1	
3/28/2024	BBK	Conferring w/ KES re updates from process server re: status of attempting service of deposition subpoena on two BD former employees.	0.2	
3/28/2024	BBK	Emailing with team re potential medical expert to opine on danger to class members from Fleet Safety Policy requirements.	0.2	
3/28/2024	BBK	Emails with opposing counsel re: letter brief on benchmarks formula and meeting and conferring re: two discovery disputes.	0.1	
3/28/2024	BBK	Conferring w/ KES re Ds' objections to length of Kamdar deposition.	0.1	
3/28/2024	BBK	Planning/preparing supplemental interrogatory responses for Lindstrom and Carlson.	1.2	
3/28/2024	BBK	Debriefing w/ AX after Kamdar Deposition.	0.3	
3/28/2024	BBK	Reviewing AX report to co-counsel re Kamdar Deposition.	0.1	
3/28/2024	BBK	Reviewing emails w/ opposing counsel re Stiner supp doc prod.	0.1	
3/28/2024	BBK	Reviewing Pls' Reply Portion of letter brief re benchmarks formula.	0.1	
3/28/2024	AHS	Conf. w/ KS re: producing documents.	0.3	
3/28/2024	AHS	(Billing Judgment) Attended part of deposition of Dimple Kamdar.	0.0	3.2
3/28/2024	AHS	Call with discovery vendor.	0.3	
3/28/2024	AHS	Reviewed edits to case tasks list and emailed with BBK.	0.2	
3/28/2024	AHS	Reviewed AX summary email of Dimple Kamdar Deposition.	0.3	
3/28/2024	AX	Prepare for deposition of Dimple Kamdar, including reviewing exhibits and outline.	1.5	
3/28/2024	AX	Deposition of Dimple Kamdar, including conferring with opposing counsel and team and breaks.	5.0	
3/28/2024	AX	Confer with GCG re call with potential FSP expert, deposition questions, other case issues.	0.5	
3/28/2024	AX	Confer with JSY re deposition issues.	0.2	
3/28/2024	AX	Draft summary to team re deposition.	0.5	
3/28/2024	AX	Confer with BBK re deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/28/2024	KES	Arrange for service of depo subpoena; follow up calls and emails re service of two depo subpoenas.	0.7	
3/28/2024	KES	Create Sharefile for docs for WaPo.	0.2	
3/28/2024	KES	Review and send photos to team for meeting with potential expert.	0.3	
3/28/2024	KES	WL research re expert Barchuk.	0.5	
3/28/2024	KES	Email team with Protective Order for expert.	0.1	
3/28/2024	KES	Review service info re subpoena and prepare and serve NOD of Ann Wahl.	0.5	
3/29/2024	GCG	Prepare for and conduct meeting w/ Brookdale team re ongoing discovery and expert report writing.	0.9	
3/29/2024	GCG	Meet w/ RBGG to discuss plaintiff discovery supplementation.	0.2	
3/29/2024	GCG	Conf w/ and email to AS re BJH emails and texts.	0.1	
3/29/2024	GCG	Review and analyze report re healthcare program at facilities for use in ADA analysis.	0.1	
3/29/2024	JSY	Emails re BJH documents.	0.1	
3/29/2024	BBK	Reviewing emails w/ opposing counsel re final meet and confer on discovery disputes over benchmark formula and supplementation of discovery, S. Stiner supp discovery responses, and withdrawal of sealing motion submitted w/ terminated motion to compel benchmark formula.	0.2	
3/29/2024	BBK	Reviewing/responding to R. Steyer query re supp ROG responses for S. Stiner.	0.1	
3/29/2024	BBK	Reviewing/responding to AHS report re status of supp doc production for B. Jestrabek-Hart.	0.2	
3/29/2024	BBK	Co-counsel meeting re: discovery and expert reports & RBGG debrief re same.	1.1	
3/29/2024	BBK	Reviewing Ds' and Pls' final compromise positions for two letter briefs on benchmarks formula and supplemental discovery production; reviewing AX email to B. Umpierre re supp ROG responses for R. Schmidt.	0.1	
3/29/2024	AHS	Reviewed files from named plaintiff for high level relevancy of what to upload to Relativity.	0.9	
3/29/2024	AHS	Emailed team re: document production.	0.5	
3/29/2024	AHS	Weekly call with co-counsel and AX, BBK, GCG, DLE to discuss upcoming depositions and discovery cutoff dates.	1.0	
3/29/2024	AHS	Call with GCG, AX, BBK, DLE to talk about next steps and priorities.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/29/2024	AHS	Call with AX re: supplementary rogs and doc production.	0.3	
3/29/2024	AHS	Emailed GCG re: background and proposal for call with discovery vendor.	0.2	
3/29/2024	AHS	Discussed document production and Relativity uploads with DLE.	0.3	
3/29/2024	AHS	Talked to GCG and DLE re: timeline and plan for sending new hard drive to named plaintiff.	0.5	
3/29/2024	AHS	E-mailed discovery vendor re next steps for document production for named plaintiff.	0.2	
3/29/2024	AHS	Updated case tasks list.	0.7	
3/29/2024	AHS	Arranged for sending drive to named plf for doc prod.	0.2	
3/29/2024	AHS	Conf. w/ DLE re: getting documents from named plf.	0.2	
3/29/2024	AHS	Emailed with team re: timeline for producing documents from named plf.	0.4	
3/29/2024	AX	Emails to DE re preparing documents to provide to FSP expert.	0.4	
3/29/2024	AX	Meeting with cocounsel re case tasks, updates, and strategy.	1.1	
3/29/2024	AX	Communications with AS, BU re case tasks.	0.3	
3/29/2024	AX	Review stipulation and email to team re same.	0.3	
3/29/2024	AX	Compile and send deposition exhibits to court report from Kamdar deposition.	0.5	
3/29/2024	AX	Document review and prepare for Kelli Zahner (happy camper) deposition.	1.0	
3/29/2024	AX	(Billing Judgment) Email communications with Defs, Dr. Montoya re draft reports.	0.0	0.2
3/29/2024	DLE	Confer with AHS re text message supplementation issue.	0.1	
3/29/2024	DLE	Send drive to client for text message supplementation.	0.9	
3/29/2024	DLE	Attend and note-take weekly co-counsel meeting and firm only debrief.	1.1	
3/29/2024	DLE	Finalize and circulate notes from weekly meeting.	0.3	
3/29/2024	DLE	Circulate news article about case.	0.1	
3/29/2024	DLE	Confer with discovery vendor about obtaining emails and documents for client supplementation.	0.6	
3/30/2024	GCG	Email to JSY and BBK re named plaintiff document review.	0.1	
3/30/2024	GCG	Review and analyze letter brief re benchmark formula.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/30/2024	JSY	Emails re BJH documents.	0.2	
3/30/2024	BBK	Emailing w/ JSY and GCG re plan for supp doc production of B. Jestrabek-Hart emails; reviewing JSY email to AHS re same.	0.2	
4/1/2024	GCG	Conf w/ JSY re court concerns re exhibits filing and plan for review of named plaintiff texts.	0.1	
4/1/2024	GCG	Email w/ GW and outside expert re WAPO article on Brookdale understaffing.	0.1	
4/1/2024	GCG	Review and analyze same for use in depositions and expert report.	0.2	
4/1/2024	JSY	Conf. w/ AS re BJH doc production.	0.4	
4/1/2024	JSY	Emails re sealing motion.	0.1	
4/1/2024	JSY	Review WaPo article.	0.2	
4/1/2024	JSY	Emails re former ED deposition.	0.1	
4/1/2024	JSY	Conf. w/ GCG re filing error and BJH production.	0.2	
4/1/2024	JSY	Emails re filing error.	0.2	
4/1/2024	JSY	Emails re service of subpoenas.	0.1	
4/1/2024	JSY	Draft supplemental ROG responses; review depo transcript re same.	1.5	
4/1/2024	BBK	Reviewing Senior Housing Article on Brookdale's new Health Plus Program; conferring w/ team re seeking info re: same through upcoming depositions.	0.1	
4/1/2024	BBK	Emailing w/ RBGG team re retaining medical expert re: transfer-related dangers due to FSP.	0.1	
4/1/2024	BBK	Reviewing M. Johnson letter to Ds re deposition of Michael Johnson.	0.1	
4/1/2024	BBK	Emailing w/ opposing counsel re: stipulation to withdraw sealing motion re terminated MTC benchmarks formula.	0.1	
4/1/2024	BBK	Reviewing Washington Post article re BD's understaffing via Service Alignment; conferring w/ team re same.	0.2	
4/1/2024	BBK	Reviewing/editing draft case task list.	0.2	
4/1/2024	BBK	Emailing w/ AX and process server vendor re: service of deposition subpoena on B. Kumar.	0.2	
4/1/2024	BBK	Phone call w/ B. Kumar re deposition (including prep for same).	0.3	
4/1/2024	BBK	Drafting/sending reports and recommendation to RBGG team and co-counsel re phone call w/ B. Kumar re deposition.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 858

SERVICES

Date	Person	Description of Services	Hours	Discount
4/1/2024	BBK	Reviewing emails w/ OC re status of Pls' supp doc productions and ROG responses; conferring w/ RBGG team re same.	0.2	
4/1/2024	BBK	Emailing w/ AHS re status of and plan for B Jestrabek-Hart supp doc production.	0.1	
4/1/2024	BBK	Emailing w/ RBGG team and M. Johnson re addressing Court's request to correct filing of joint letter brief.	0.2	
4/1/2024	BBK	Conferring w/ process server vendor re status of service of deposition subpoena on AO; reporting to co-counsel and RBGG team re same.	0.2	
4/1/2024	BBK	Emailing KES re: finding Sunnyvale location and court reporter/videographer for B. Kumar deposition and serving amended deposition subpoena and notice of depo for same.	0.2	
4/1/2024	BBK	Emailing P. Lindstrom and J. & R. Carlson re supplemental ROG responses.	0.2	
4/1/2024	BBK	Reviewing Ds' 3d Set of RFPs and analyzing same for RBGG team.	0.1	
4/1/2024	BBK	Drafting/preparing Lindstrom 2d Supp ROG Responses.	1.5	
4/1/2024	AHS	Call with JY re: doc review.	0.4	
4/1/2024	AHS	Followed up with discovery vendor and named plf re: extracting text messages.	1.2	
4/1/2024	AHS	Read Washington Post story re: Brookdale.	0.3	
4/1/2024	AHS	Reviewed sample supplemental interrogatories.	0.3	
4/1/2024	AHS	Worked on supplementing Loresia's interrogatories.	2.4	
4/1/2024	AHS	Read Quinlan/Loresia's declaration to help prepare supplemental rog responses.	0.4	
4/1/2024	FGL	Email from/to AX re exhibits for deposition.	0.1	
4/1/2024	DLE	Save and circulate recently filed pleadings, letters, and case related press articles.	0.9	
4/1/2024	DLE	Review expert reports to select images to distribute to new transportation expert.	1.3	
4/1/2024	DLE	Review class member declarations to select portions to circulate to new transportation expert.	0.8	
4/1/2024	DLE	Confer with AX re question related to transportation expert task.	0.1	
4/2/2024	GCG	Email to AX and JSY re retention of new expert.	0.1	
4/2/2024	GCG	Email to AX and team re Happy Camper deposition.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 859

SERVICES

Date	Person	Description of Services	Hours	Discount
4/2/2024	GCG	Conf w/ KS re expedited deposition transcript.	0.1	
4/2/2024	JSY	Edit supplemental ROGs.	0.4	
4/2/2024	JSY	Messages and conf. re production of BJH emails.	0.4	
4/2/2024	JSY	Emails re retainer for expert.	0.1	
4/2/2024	BBK	Emailing w/ P. Lindstrom and J. Carlson re meetings on 2d supp ROG responses.	0.1	
4/2/2024	BBK	Reviewing emails w/ opposing counsel re postponing R. Stiner deposition, scheduling Feaster deposition, and production of putative class lists; conferring w/ RBGG team e same.	0.2	
4/2/2024	BBK	Emailing w/ AHS re updates to case task list.	0.1	
4/2/2024	BBK	Emailing w/ AX re plan for 4/4 deposition of resident-declarant.	0.3	
4/2/2024	BBK	Emailing w/ KES and court reporter service re new location for B. Kumar deposition.	0.3	
4/2/2024	BBK	Emailing w/ KES re preparing amended depo notice and cover letter for B. Kumar deposition and Notice of Deposition re same for Ds; reviewing/commenting on same.	0.4	
4/2/2024	BBK	Failed attempts to reach B. Kumar by phone re: deposition; left VM.	0.1	
4/2/2024	BBK	Conferring w/ RBGG team re immediate case tasks.	0.2	
4/2/2024	BBK	Emailing w/ co-counsel re correcting ECF 761 per Court's 4/1 Order; reviewing same.	0.2	
4/2/2024	BBK	Emailing w/ RBGG team re plan for Feaster Depo and remaining depositions to take in April.	0.2	
4/2/2024	BBK	Conferring w/ AHS and JSY re analyzing B Jestrabek-Hart emails for supp doc production (including outreach to co-counsel and R. Bonner re same).	0.5	
4/2/2024	BBK	Conferring w/ RBGG team re obtaining transcript of D. Kamdar Depo.	0.1	
4/2/2024	BBK	Preparing P. Lindstrom 2d supp ROG responses (including analyzing depo transcript for same).	1.4	
4/2/2024	BBK	Reviewing AX email to team re and draft outline for 4/4 deposition of resident-declarant.	0.3	
4/2/2024	AHS	Discussed discovery tasks and records review with DLE.	0.2	
4/2/2024	AHS	Call with Bernie and discovery vendor to extract text messages onto hard drive.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 860

SERVICES

Date	Person	Description of Services	Hours	Discount
4/2/2024	AHS	Followed up with DLE, JY, and team re: document production and review for named plf.	0.3	
4/2/2024	AHS	Reviewed Def's RFPs for Bernie.	0.9	
4/2/2024	AHS	Talked to AX and KS re transcript and video from declarant depositions on 3/20/24.	0.5	
4/2/2024	AHS	Reviewed team emails re: depositions and production.	0.4	
4/2/2024	AHS	Called co-counsel to discuss uploading documents to Relativity.	0.2	
4/2/2024	AHS	Talked to BBK, JY, KS re: doc review for Bernie's supplemental RFPs.	0.4	
4/2/2024	AHS	Reviewed Bernie's emails for supplemental RFP responses.	2.4	
4/2/2024	AX	Prepare outline for happy camper deposition, including reviewing documents.	3.8	
4/2/2024	AX	Emails re exhibits for happy camper deposition.	0.3	
4/2/2024	AX	Emails re disclosing email from happy camper declarant to Defs.	0.3	
4/2/2024	AX	Revise documents prepared for Dr. Barchuk re Brookdale vans/buses.	0.4	
4/2/2024	FGL	Review AX instructions for deposition exhibits, organize same and process.	0.3	
4/2/2024	DLE	Schedule and circulate defendants' RPD and deadlines for responding.	0.2	
4/2/2024	DLE	Meeting with AHS to discuss case issues and assignments.	0.2	
4/3/2024	GCG	Revise and send retainer agreement to AB.	0.5	
4/3/2024	GCG	Review AB materials.	0.3	
4/3/2024	GCG	Review MJ and BBK emails re class list and expert document demand.	0.2	
4/3/2024	GCG	Emails to GW re expert reports and invoices.	0.2	
4/3/2024	GCG	Review AS report on BJH email review.	0.1	
4/3/2024	GCG	Conf w/ JSY re JA in ICU and implications thereof.	0.2	
4/3/2024	GCG	Conf w/ KES re expert AB.	0.1	
4/3/2024	GCG	Emails w/ TC re Cross report and overlap w/ AB opinions.	0.1	
4/3/2024	GCG	Email w/ BBK re class member outreach.	0.1	
4/3/2024	JSY	Conf. w/ JA re status.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/3/2024	JSY	Emails re ICU admission of named P JA and supplemental discovery obligations.	0.2	
4/3/2024	JSY	Conf. w/ GCG re JA.	0.1	
4/3/2024	JSY	Emails re expert retention.	0.1	
4/3/2024	JSY	Emails re BJH text production.	0.1	
4/3/2024	JSY	Review BJH emails; emails re same.	0.2	
4/3/2024	BBK	Conferring w/ co-counsel re RFPs served by Ds for access expert materials from inspections and seeking same from Ds' access expert(s).	0.2	
4/3/2024	BBK	Reviewing/commenting on/drafting proposed revisions to M. Johnson draft reciprocal RFPs seeking docs prepared by Ds' access expert(s) during inspections and cover email re same.	0.4	
4/3/2024	BBK	Emailing w/ AX re strategy for 4/4 resident-declarant deposition.	0.1	
4/3/2024	BBK	Emailing w/ co-counsel re Ds' production of class list w/o contact information and drafting follow-up email re same; drafting/revising/sending same to opposing counsel.	0.7	
4/3/2024	BBK	Conferring w/ KES and co-counsel re outreach by letter to current residents at 4 facilities controlled by BD.	0.2	
4/3/2024	BBK	Reviewing/commenting on RS draft mailer to current residents of 4 facilities; reviewing MJ comments on same.	0.2	
4/3/2024	BBK	Reviewing emails w/ opposing counsel re length of and production of docs for Johnson/30b6 deposition and re setting dates for R. Stiner and Feaster depositions.	0.2	
4/3/2024	BBK	Conferring w/ KES and M. Johnson re service of depo subpoena on A. Omole and preparing/serving NOD with request for ESI production for same; reviewing/approving draft NOD.	0.7	
4/3/2024	BBK	Conferring w/ GCG re creating website posting re BD case status for putative class member outreach.	0.1	
4/3/2024	BBK	Conferring w/ team re J. Algarme health issue and delaying supplementation of disc responses ILO same.	0.1	
4/3/2024	BBK	Failed attempts to reach B. Kumar re 4/23 deposition location; updating co-counsel and RBGG team re same.	0.2	
4/3/2024	BBK	Conferring w/ RBGG team re plan to notice deposition of B. Kumar at subpoenaed location.	0.2	
4/3/2024	BBK	Emailing w/ RBGG team and co-counsel re retaining medical expert and preparing report.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/3/2024	BBK	Reviewing AHS report re analysis of BJH emails for supp doc production and status of obtaining texts for same.	0.2	
4/3/2024	BBK	Analyzing emails/RFPs/complaint to address AHS questions re: responsiveness and potential privileges of certain emails to determine whether to produce same.	0.5	
4/3/2024	BBK	Revising NOD of B. Kumar and assigning KES to finalize same for service morning of 4/4.	0.2	
4/3/2024	BBK	Preparing Lindstrom 2d Supp ROG Responses (including digesting depo transcript for same).	1.8	
4/3/2024	AHS	Emailed with co-counsel re: getting documents up on Relativity.	0.2	
4/3/2024	AHS	Emailed with team re: discovery and upcoming depositions.	1.2	
4/3/2024	AHS	Reviewed Bernie Jestrabek-Hart's emails for supplemental RFP response and emailed team summary.	3.8	
4/3/2024	AHS	E-mailed DLE and KS re hard drive with information for supplemental RFPs for Bernie Jestrabek-Hart.	0.2	
4/3/2024	AHS	Updated case tasks list.	0.4	
4/3/2024	AX	Review team email correspondence re document review for Bernie Jestrabek-Hart and document production.	0.3	
4/3/2024	AX	Revise retainer letter for Alex Barchuk, FSP expert, and related correspondence with team.	0.7	
4/3/2024	AX	Review emails re retainer letter and conflicts check for Alex Barchuk.	0.3	
4/3/2024	AX	Prepare for Kelli Zahner deposition, including revise deposition outline.	0.7	
4/3/2024	KES	(Billing Judgment) Finalize and send expert retainer agreement and attachments.	0.0	0.6
4/3/2024	KES	Download and organize Kamdar deposition transcript materials.	0.4	
4/3/2024	KES	Review service on former ED and prepare NOD for Omole; confer BBK re same.	0.6	
4/4/2024	GCG	Research and draft memo to file re expert AB.	0.7	
4/4/2024	GCG	Confs w/ BBK, KES and JSY re deposition planning and motion to quash subpoenas.	0.5	
4/4/2024	JSY	Conf. and emails re BJH production.	0.2	
4/4/2024	JSY	Conf. w/ GCG re expert declaration.	0.1	
4/4/2024	JSY	Emails re meeting time with ML.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/4/2024	BBK	Reviewing E. Rutner email re: deposition subpoenas for B. Kumar and A. Omale; emailing w/ RBGG and co-counsel re proposed response to same.	0.5	
4/4/2024	BBK	Attending to finalizing/serving Notice of Deposition for B. Kumar (including conferring w/ KES and DE re preparing same).	0.3	
4/4/2024	BBK	Reviewing E. Rutner email re representing B. Kumar in her individual capacity and plan to file motion to quash; emailing w/ co-counsel and RBGG team re same.	0.2	
4/4/2024	BBK	Conferring w/ KES and JSY re plan for production of B. Jestrabek Hart emails for supp doc prod.	0.1	
4/4/2024	BBK	Reviewing E. Rutner email re: Ds' failure to produce contact info for current residents as promised; emailing w/ co-counsel and RBGG team re same.	0.2	
4/4/2024	BBK	Drafting proposed response to E. Rutner re offer to produce residency agreements in lieu of contact info for putative class members.	0.3	
4/4/2024	BBK	Emailing w/ co-counsel and RBGG team re plan for supp ROG responses for Lindstrom and Carlson.	0.2	
4/4/2024	BBK	Drafting Lindstrom 2d Supp ROG Responses (including analyzing depo transcript for same).	1.4	
4/4/2024	BBK	Phone call w/ BH re legal research on motions to quash subpoenas in prep for opposing same from BD.	0.2	
4/4/2024	BBK	Research re procedures for motion to quash subpoenas and oppositions to same; conferring w/ co-counsel re same.	0.8	
4/4/2024	BBK	Emailing w/ co-counsel re noticing K. Rubin depo and depositions of Health & Wellness Directors.	0.1	
4/4/2024	BBK	Reviewing emails w/ opposing counsel re Pls' supp doc production from R. Stiner and plan for R. Stiner depo.	0.1	
4/4/2024	BBK	Emailing w/ co-counsel re time periods of BD residencies of named plaintiffs for staffing analysis.	0.1	
4/4/2024	BBK	Reviewing AX report re resident-declarant deposition of K. Zahner.	0.1	
4/4/2024	BBK	Phone call w/ GCG re depositions, opposing motion to quash, and supplemental interrogatory responses.	0.3	
4/4/2024	BBK	Preparing materials for GCG for medical expert.	0.2	
4/4/2024	BBK	Emailing w/ AHS and co-counsel re analyzing B. Jestrabek-Hart emails for supp doc prod.	0.1	
4/4/2024	AX	(Reduced Charge) Travel to and from San Bernadino for deposition of Kelli Zahner (happy camper).	1.5	1.5

SERVICES

Date	Person	Description of Services	Hours	Discount
4/4/2024	AX	(Billing Judgment) Print exhibits for deposition.	0.0	0.8
4/4/2024	AX	Deposition of Kelli Zahner and prep for same.	3.2	
4/4/2024	AX	Draft email summary of deposition to team.	0.3	
4/4/2024	KES	Review status of service of depo subpoenas and calendar depo dates.	0.3	
4/4/2024	KES	(Billing Judgment) Emails with Dr. Barchuk office re W9.	0.0	0.2
4/4/2024	KES	Send client hard drive to discovery vendor.	0.3	
4/4/2024	KES	Revise and finalize Kumar depo notice.	0.7	
4/4/2024	KES	Brief review and emails re client docs uploaded to Relativity.	0.6	
4/4/2024	KES	Download transcript file.	0.1	
4/4/2024	KES	(Billing Judgment) Review and forward depo venue invoice.	0.0	0.1
4/4/2024	KES	Review AX summary of Zahner depo.	0.1	
4/4/2024	KES	Review team emails re discovery issues.	0.1	
4/4/2024	DLE	Work on formatting notice of deposition for former executive director.	0.6	
4/4/2024	DLE	Save and circulate recently served NODs.	0.2	
4/4/2024	DLE	Confer with KES re formatting NOD.	0.3	
4/5/2024	GCG	Conf w/ JSY and emails to BBK and AX re case priorities and planning for close of discovery.	0.2	
4/5/2024	GCG	Meet w/ SW team and BU re plan for depositions, expert reports and motion practice.	1.3	
4/5/2024	GCG	Follow up call w/ RBGG team re serving deposition notices.	0.1	
4/5/2024	GCG	Confs w/ BBK and JSY re same and re motion for partial summary judgment.	0.2	
4/5/2024	JSY	Emails re BJH production.	0.1	
4/5/2024	JSY	Conf. w/ GCG re HWD depos.	0.1	
4/5/2024	JSY	Conf. w/ KES re BJH production.	0.1	
4/5/2024	JSY	Conf. w/ BBK and AX re deposition plan and case priorities.	0.7	
4/5/2024	JSY	Team meeting.	1.2	
4/5/2024	JSY	RBGG check in re case tasks.	0.2	
4/5/2024	JSY	Emails re case priorities and schedule.	0.2	
4/5/2024	JSY	Emails re BJH email production.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/5/2024	JSY	Conf. and emails re depo schedule and notices.	0.2	
4/5/2024	JSY	Emails re expert report.	0.1	
4/5/2024	BBK	Emailing w/ RBGG team re analysis of supplemental document production.	0.1	
4/5/2024	BBK	Emailing w/ co-counsel re plan for completing discovery and expert reports by 5/1.	0.1	
4/5/2024	BBK	Drafting report to RBGG team re tasks necessary to complete in advance of 5/1 discovery cut-off and expert disclosures deadline and upcoming briefing and filing deadlines for motions & plan to address same.	0.4	
4/5/2024	BBK	Updating case task list.	0.6	
4/5/2024	BBK	Meeting w/ JSY and AX re plan for immediate case tasks and for proposals at co-counsel meeting re depositions.	0.7	
4/5/2024	BBK	Preparing 2d Supp Rog Responses for Carlson.	0.3	
4/5/2024	BBK	Co-counsel team meeting re: plan for completing discovery and expert reports; RBGG debrief after same.	1.3	
4/5/2024	BBK	Emailing w/ KES re obtaining proof of service for deposition subpoenas served on former EDs.	0.1	
4/5/2024	BBK	Phone call w/ AX re identifying former Health & Wellness Directors of Scotts Valley and San Ramon whose depositions we should seek.	0.2	
4/5/2024	BBK	Researching former HWD of Scotts Valley and San Ramon.	0.2	
4/5/2024	BBK	Reviewing email from E. Rutner re: using letter brief process for their planned motion to quash deposition subpoenas; PC w/ JSY re responding to same.	0.2	
4/5/2024	BBK	Drafting recommendation to co-counsel re which former Scotts Valley HWD to depose.	0.2	
4/5/2024	BBK	Drafting proposed email response to E. Rutner email re using letter brief process for motion to quash.	0.4	
4/5/2024	BBK	Attending to creating/serving Notices of Deposition for current HWDs of Scotts Valley and San Ramon & preparing deposition subpoenas for former HWDs (including emailing w/ KES and reviewing/approving).	0.4	
4/5/2024	BBK	Phone calls w/ KES re Notices of Deposition and deposition subpoenas.	0.3	
4/5/2024	BBK	Emailing w/ co-counsel re serving NODs and sending email to E. Rutner re: using letter brief process for motion to quash; reviewing NOD served for Kelly Rubin by co-counsel.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/5/2024	BBK	Conferring w/ AX/KES/JSY re plan for issuing deposition subpoenas for former HWDs on 4/8.	0.2	
4/5/2024	AX	Calls with KJ re scheduling happy camper deposition and logistics re same.	0.5	
4/5/2024	AX	Calls and emails with DE re organizing case documents.	0.4	
4/5/2024	AX	Meeting with BBK and JSY re case strategy, discovery issues, case tasks.	0.7	
4/5/2024	AX	Update memo re Dr. Barchuk.	0.3	
4/5/2024	AX	Emails with Dr. Barchuk admin re prior expert reports.	0.3	
4/5/2024	AX	Emails with KES and emails and calls with BBK and team re noticing ED/HWD depositions.	0.5	
4/5/2024	AX	Meeting with cocounsel and RBGG team re case strategy and case tasks.	1.3	
4/5/2024	AX	Draft BJH interrogatory responses.	0.5	
4/5/2024	KES	Emails with R. Bonner re client document coding issues.	0.4	
4/5/2024	KES	Zoom meeting with co-counsel re depos and discovery.	1.2	
4/5/2024	KES	Download, circulate and organize Kamdar depo in TextMap.	0.3	
4/5/2024	KES	Review and code client docs in Relativity for production; confer DE re same.	2.0	
4/5/2024	KES	Review and circulate pos's re depo subpoenas.	0.2	
4/5/2024	KES	Draft, revise, finalize and service two notices of depo.	0.8	
4/5/2024	KES	Draft depo withdrawal letter to KJ.	0.2	
4/5/2024	DLE	Named plaintiff doc review for privilege.	1.4	
4/5/2024	DLE	Confer with KES re doc review task.	0.4	
4/5/2024	DLE	Confer with AX re organizing case documents.	0.3	
4/5/2024	DLE	Organize documents.	1.5	
4/5/2024	DLE	Attend and note-take weekly co-counsel meeting and firm only debrief.	1.3	
4/5/2024	DLE	Organize and circulate notes from weekly meeting and debrief.	0.3	
4/5/2024	DLE	Save and circulate recently filed pleadings.	0.2	
4/8/2024	GCG	Emails to JSY and team re JM and GW expert reports.	0.1	
4/8/2024	GCG	Attend to expert invoices; email JM re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/8/2024	JSY	Emails re new barrier lists.	0.1	
4/8/2024	JSY	Emails and messages re HWD depos.	0.2	
4/8/2024	JSY	Emails re ROG response supplementation.	0.1	
4/8/2024	BBK	Reviewing email from J. Mastin re draft access barriers report for re-inspection of BD Scotts Valley; emails re status of analysis of B. Jestrabek Hart emails for supp doc prod; emails from opposing counsel re: R. Stiner deposition and supp doc prod for Johnson depo re: FSP; and emails w/ co-counsel re missing docs from Ds' prior production re R. Stiner.	0.2	
4/8/2024	BBK	Preparing for meeting w/ P Lindstrom re 2d Supp ROG Responses.	0.3	
4/8/2024	BBK	Meeting w/ P Lindstrom re 2d Supp ROG Responses.	0.9	
4/8/2024	BBK	Drafting/sending FU email w/ questions to P. Lindstrom re access barriers for 4/11 meeting re 2d Supp ROG Responses.	0.5	
4/8/2024	BBK	Conferring w/ JSY/AX/AHS re plan for depositions of HWDs.	0.2	
4/8/2024	BBK	Meeting w/ AX/AHS re plan for depositions of HWDs and supp ROG responses and doc prods.	1.3	
4/8/2024	BBK	Emailing w/ AX/KES/AHS re preparing/serving depo subpoenas for two former HWDs.	0.3	
4/8/2024	BBK	Emailing w/ AHS/KES/DE re searching for docs relevant for HWD depositions.	0.2	
4/8/2024	AHS	Emails re various case issues.	1.8	
4/8/2024	AHS	Talked to AX and DLE re: Bernie's supplemental productions and rogs.	0.2	
4/8/2024	AHS	Talked to AX, BBK about dates for depos and scheduling a meeting to prep.	0.3	
4/8/2024	AHS	Reviewed Bernie Jestrabek-Hart's documents for supplemental production.	0.3	
4/8/2024	AHS	Call with KS re supplemental production for Bernie Jestrabek-Hart.	0.3	
4/8/2024	AHS	Talked to DLE re: Bernie Jestrabek-Hart's documents for supplemental production.	0.1	
4/8/2024	AHS	Call with AX and BBK re upcoming depositions and document review.	1.3	
4/8/2024	AHS	Talked to KS and DLE to coordinate doc review to prep for health and wellness director depos.	0.5	
4/8/2024	AHS	Emailed team with plan for doc review and HWD depo prep.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 868

SERVICES

Date	Person	Description of Services	Hours	Discount
4/8/2024	AHS	Emailed with BBK KS DLE re document review for deposition prep.	0.2	
4/8/2024	AX	Call with Bernie Jestrabek-Hart re scheduling call.	0.1	
4/8/2024	AX	Meeting with BBK and AS re prep for HWD depositions and other case issues.	1.1	
4/8/2024	AX	Emails to team re HWD depositions and other case issues.	0.2	
4/8/2024	AX	Draft Bernie Jestrabek-Hart interrogatory responses.	1.8	
4/8/2024	KES	Complete review and coding of client emails in Relativity for potential production.	1.5	
4/8/2024	KES	WL research re potential former HWD deponents.	0.6	
4/8/2024	KES	Draft and finalize subpoenas for Squires and Appeal, locate and reserve depo locations for each, and arrange for service of depo subpoenas.	2.8	
4/8/2024	KES	Review and gather documents for potential use as exhibits for Gordon-Alvarez depo.	0.7	
4/8/2024	DLE	Begin scheduling and circulating upcoming depositions; save and circulate recently served NODs.	0.6	
4/9/2024	GCG	Conf w/ AX and emails to AB re draft expert report.	0.5	
4/9/2024	GCG	Conf w/ JSY re supplementing named plaintiff discovery and upcoming depositions.	0.2	
4/9/2024	GCG	Review emails to MJ and AX re BJH barriers and transportation issues.	0.2	
4/9/2024	GCG	Review BBK emails re meet and confer and depositions.	0.2	
4/9/2024	JSY	Emails re BJH text production.	0.1	
4/9/2024	JSY	Conf. w/ ML re ROG supplementation.	0.7	
4/9/2024	JSY	Emails re depo dates and meet and confer.	0.2	
4/9/2024	JSY	Conf. w/ GCG re status of discovery projects.	0.2	
4/9/2024	JSY	Conf. w/ AS and KES re BJH doc production.	0.2	
4/9/2024	JSY	Emails re ROG supplementation.	0.2	
4/9/2024	JSY	Review BJH email production; multiple emails and conf. re same.	1.0	
4/9/2024	BBK	Emailing w/ co-counsel re E. Rutner request to meet and confer re deposition subpoena to B. Kumar and re: Pls' positions for same; drafting/sending reply email to E. Rutner.	0.5	
4/9/2024	BBK	Conferring w/ DE re schedule and logistics for upcoming depositions.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 869

SERVICES

Date	Person	Description of Services	Hours	Discount
4/9/2024	BBK	Conferring w/ AX re drafting update to RBGG website re: case status for putative class member outreach.	0.1	
4/9/2024	BBK	Reviewing report from AHS re additional tech issues w/ obtaining B. Jestrabek-Hart text messages for supp doc production; conferring w/ JSY re same.	0.2	
4/9/2024	BBK	Reviewing/responding to JSY query re: second supp ROG response re: access barriers encountered by Pls and damages claims; reviewing emails w/ co-counsel re same.	0.3	
4/9/2024	BBK	Reviewing E. Rutner email re Ds' unavailability for three noticed depositions on dates noticed; emailing w/ co-counsel re addressing same.	0.2	
4/9/2024	BBK	Emailing w/ M. Johnson re plan for meet and confer on noticed depositions.	0.2	
4/9/2024	BBK	Meeting and conferring w/ Ds on noticed depositions.	0.4	
4/9/2024	BBK	Phone call w/ M. Johnson to debrief re meet and confer on additional depositions and re: supp disc responses from named Pls.	0.3	
4/9/2024	BBK	Preparing notes from meet and confer and drafting/sending summary of key points and next steps for RBGG team and co-counsel.	0.4	
4/9/2024	BBK	Reviewing opposing counsel's email to MJ Beeler's Clerk re: status of motion for reconsideration of deposition order and M. Johnson response; conferring w/ JSY re same.	0.1	
4/9/2024	BBK	Emailing w/ AHS and RBGG team re M. Johnson method for obtaining named Pls texts for sup doc production.	0.1	
4/9/2024	BBK	Emailing w/ J. Thornton and M. Johnson re K. Rubin Deposition.	0.1	
4/9/2024	BBK	Emailing w/ AHS/KES/DE re targeted searches for emails/docs for use in HWD depositions.	0.2	
4/9/2024	BBK	Locating/analyzing relevant docs for HWD depositions and drafting emails to AHS re same.	0.5	
4/9/2024	BBK	Reviewing E. Rutner email re representation of former BD employee A. Omele for purpose of moving to quash deposition subpoena and conferring w/ co-counsel re Ds' request to M&C on 4/10 re same.	0.2	
4/9/2024	BBK	Emailing w/ AHS/KES/JSY re status of supp prod of B. Jestrabek-Hart emails and reviewing same for production.	0.2	
4/9/2024	BBK	Reviewing AX emails to RBGG team and co-counsel w/ questions re 2d supp ROG responses for B. Jestrabek-Hart.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
4/9/2024	BBK	Emailing w/ R. Steyer re status of Ds' promised production of residency agreements of current residents in lieu of contact information.	0.1	
4/9/2024	BBK	Drafting Carlson 2d supp ROG responses.	1.0	
4/9/2024	AHS	Reviewed emails with co-counsel in advance of meet and confer.	0.3	
4/9/2024	AHS	Emailed team re: supplemental document production for named plaintiff.	0.5	
4/9/2024	AHS	Call with AX and plaintiff Bernie Jestrabek-Hart.	1.5	
4/9/2024	AHS	Emailed discovery vendor.	0.4	
4/9/2024	AHS	Talked to KS re docs to produce.	0.2	
4/9/2024	AHS	Reviewed emails re:upcoming M&C and depos.	0.9	
4/9/2024	AHS	Updated case tasks list.	0.2	
4/9/2024	AHS	Met with KS to discuss Relativity and supplemental document production.	0.6	
4/9/2024	AHS	Reviewed Bernie's documents on Relativity.	3.2	
4/9/2024	AHS	Communicated with Bernie Jestrabek-Hart about supplemental document production.	0.2	
4/9/2024	AHS	Reviewed Bernie Jestrabek-Hart's emails for supplemental production.	1.4	
4/9/2024	AHS	Emailed team re: supplemental document production.	0.2	
4/9/2024	AX	Call with Bernie Jestrabek-Hart and AS re interrogatory responses.	1.3	
4/9/2024	AX	Call with Loresia Vallette re scheduling call.	0.1	
4/9/2024	AX	Call with Loresia Vallette re interrogatory responses.	0.2	
4/9/2024	AX	Draft Bernie Jestrabek-Hart interrogatory responses.	2.5	
4/9/2024	AX	Emails to team re interrogatory responses and FSP issues at Scotts Valley.	0.7	
4/9/2024	DLE	Reserve conference rooms and calendar upcoming depositions of EDs and HWDs.	1.0	
4/9/2024	DLE	(Billing Judgment) Call with LVM re reserving conference room for deposition.	0.0	0.3
4/9/2024	DLE	Save and circulate expert documents to appropriate locations.	0.5	
4/10/2024	GCG	Conf w/ JSY and emails to BBK and AS re production of named plaintiff texts and emails.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 871

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2024	JSY	Conf. w/ ML re ROG responses.	0.7	
4/10/2024	JSY	Emails re production of BJH documents.	0.2	
4/10/2024	JSY	Edit ROG responses; emails re same.	0.6	
4/10/2024	JSY	Conf. w/ BBK re status of various outstanding projects.	0.4	
4/10/2024	JSY	Conf. w/ BBK re ROG responses.	0.2	
4/10/2024	BBK	Reviewing AHS update to RBGG team re status of analysis of B. Jestrabek Hart emails for supp doc prod.	0.1	
4/10/2024	BBK	Reviewing MJ Beeler Clerk's response to Ds' outreach re outstanding discovery letter briefs; emailing w/ RBGG team re same.	0.1	
4/10/2024	BBK	Emailing w/ M. Johnson re plan for meet and confer on motion to quash Omole depo subpoena and potential impact of MJ Beeler's forthcoming ruling on motion for reconsideration on Ds' intent to file same.	0.2	
4/10/2024	BBK	Conferring w/ KES re upcoming depositions and B. Jestrabek-Hart supp doc production.	0.2	
4/10/2024	BBK	Meeting w/ AHS re plan for B. Jestrabek Hart supp doc production, preparing outline for HWD depositions, and preparing supp ROG responses for Quinlan.	0.8	
4/10/2024	BBK	Emailing w/ AHS/JSY re plan for B. Jestrabek Hart supp doc production, preparing outline for HWD depositions, and preparing supp ROG responses for Quinlan.	0.1	
4/10/2024	BBK	Emailing w/ AHS/JSY/co-counsel re production of B. Jestrabek-Hart emails and status of obtaining B. Jestrabek-Hart texts for supp doc prod.	0.2	
4/10/2024	BBK	Drafting/preparing Carlson 2d supp ROG responses.	1.2	
4/10/2024	BBK	Phone call w/ J. and R. Carlson to prepare Carlson 2d supp ROG responses (including IDing all access barriers encountered by H. Carlson and frequency of same).	1.8	
4/10/2024	BBK	Conferring w/ KES and M. Johnson re Notice of Deposition for current San Ramon ED Feaster on 4/25.	0.1	
4/10/2024	BBK	Reviewing T. Close report re 4/10 meet and confer re depositions and drafting/sending follow-up questions re same.	0.2	
4/10/2024	BBK	Emailing w/ AHS re obtaining and analyzing B. Jestrabek-Hart texts for supp doc production.	0.2	
4/10/2024	BBK	Meeting w/ JSY re upcoming depositions, supp doc productions and ROG responses, and expert reports.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2024	BBK	Drafting/sending questions/recommendations re: Pls' 2d supp ROG responses re: encountering access barriers and damages.	0.3	
4/10/2024	BBK	Emailing w/ AHS re preparing HWD depo outline and plan for analysis of B. Jestrabek-Hart supp doc productions and supplementation of Quinlan ROG responses.	0.2	
4/10/2024	BBK	Conferring w/ KES re plan re redactions to B. Jestrabek-Hart emails to be produced.	0.2	
4/10/2024	BBK	Conferring w/ KES re FU w/ process server re status of service of deposition subpoenas for former HWDs; reviewing update re same.	0.2	
4/10/2024	AHS	Reviewed team e-mails.	0.1	
4/10/2024	AHS	Reviewed text messages for supplemental production and emailed team.	0.3	
4/10/2024	AHS	Updated case tasks list and e-mailed team.	0.4	
4/10/2024	AHS	Organized priorities for moving discovery production and depo prep forward.	0.2	
4/10/2024	AHS	Reviewed emails for redactions on Relativity.	0.1	
4/10/2024	AHS	Met with BBK to discuss prep for upcoming depos.	0.8	
4/10/2024	AHS	Emailed team and co-counsel re: document production.	0.3	
4/10/2024	AHS	Conf. w/ KS re: Relativity.	0.1	
4/10/2024	AHS	Met with DLE to discuss status of discovery.	0.5	
4/10/2024	AHS	Conf. w/ KS re: redactions and e-mailed team.	0.3	
4/10/2024	AHS	Call with Bernie and litigation vendor to get her text messages for supplemental production.	0.7	
4/10/2024	AHS	Emailed team and litigation vendor with parameters of documents to extract for upload to Relativity.	0.6	
4/10/2024	AHS	Updated client contact internal memo.	0.2	
4/10/2024	AHS	Reviewed materials relating to HWDs.	0.7	
4/10/2024	AHS	Conf. w/ KS re: redactions of supplemental productions.	0.2	
4/10/2024	AX	Review and revise Dr. Barchuk expert report; review FSP materials and Doug Cross declaration.	3.8	
4/10/2024	AX	Emails with Dr. Barchuk admin re protective order.	0.2	
4/10/2024	AX	Emails with AS re Bernie Jestrabek-Hart text messages.	0.2	
4/10/2024	KES	Research re status of Kirola and Heredia cases.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 873

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2024	KES	Email R. Steyer re status of Wahl depo.	0.1	
4/10/2024	KES	Review final set of client Jestrabek-Hart docs for production and arrange for imaging to enable redaction; emails with AS re index of docs to be produced and redactions.	1.5	
4/10/2024	KES	Emails with team and co-counsel re Feaster NOD.	0.2	
4/10/2024	KES	Follow up re service of subpoena on Appeal.	0.2	
4/10/2024	DLE	Meeting with AHS to discuss case tasks and assignments.	0.5	
4/10/2024	DLE	Training with KES re redactions in Relativity.	0.2	
4/11/2024	GCG	Conf w/ BBK re status of discovery supplementation, letter brief and deposition.	0.3	
4/11/2024	BBK	Reviewing Ds' portion of letter brief re motion to quash deposition subpoenas and supporting decls for same.	0.1	
4/11/2024	BBK	Phone call w/ GCG re case priorities.	0.3	
4/11/2024	BBK	Emailing access expert G. Waters re status of reports on re-inspection of Fountaingrove.	0.1	
4/11/2024	BBK	Conferring w/ GCG and G. Wallace re use of videographers for upcoming depositions.	0.1	
4/11/2024	BBK	Reviewing/revising AX draft RBGG website landing page for putative class member outreach; conferring w/ AX re same.	0.8	
4/11/2024	BBK	Emails w/ KES, AHS, and R. Bonner re finalizing/producing B. Jestrabek-Hart emails to Ds as supp doc prod.	0.3	
4/11/2024	BBK	Emailing w/ AHS re plan for extracting B. Jestrabek-Hart texts and analyzing same for supp doc prod.	0.1	
4/11/2024	BBK	Conferring w/ co-counsel and RBGG team re E. Rutner email re representing former HWD C. Squires and seeking to move to quash depo subpoena (including re: plan for meeting and conferring on same).	0.4	
4/11/2024	BBK	Emailing w/ opposing counsel re meeting and conferring on 4/12 re deposition of former HWD C. Squires.	0.1	
4/11/2024	BBK	Planning/preparing for M&C re deposition of former HWD C. Squires.	0.2	
4/11/2024	BBK	Emailing w/ KES re status of service of depo subpoena on former HWD C. Squires; reviewing emails w/ process server vendor re same.	0.2	
4/11/2024	BBK	Emails w/ KES re NOD for HWD C. Squires.	0.1	
4/11/2024	BBK	Conferring w/ KES re arranging for court reporters and videographers for 4/17 and 4/19 depositions of current HWDs; reviewing emails w/ court reporter vendor re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 874

SERVICES

Date	Person	Description of Services	Hours	Discount
4/11/2024	BBK	Conferring w/ AHS and KES re analysis of docs for and preparing of outline for HWD depositions.	0.2	
4/11/2024	BBK	Planning/preparing for co-counsel meeting on 4/12 to resolve questions re supp ROG responses and expert disclosures.	0.2	
4/11/2024	BBK	Phone meeting w/ P. Lindstrom re second supp ROG responses.	0.9	
4/11/2024	BBK	Preparing Lindstrom re second supp ROG responses.	2.1	
4/11/2024	AHS	Emailed with discovery vendor re: getting docs onto Relativity.	0.2	
4/11/2024	AHS	Emailed team summary of document extraction process to contemplate disputing charges with discovery vendor.	0.5	
4/11/2024	AHS	Reviewed materials to prep for HWD depos -.	3.4	
4/11/2024	AHS	Emailed with BBK and KS re supplemental document production.	0.3	
4/11/2024	AHS	Emailed with team re: pending depositions and meet and confer.	0.4	
4/11/2024	AHS	Call with KS re: documents for depo prep and Relativity search terms.	0.3	
4/11/2024	AHS	Discussed Loresia Quinlan's supplemental rogs with AX and pulled relevant documents.	0.2	
4/11/2024	AHS	Reviewed materials before conversation with Loresia Vallette to prepare supplemental rog responses.	0.6	
4/11/2024	AX	Emails re revisions to Brookdale/RBGG website.	0.4	
4/11/2024	AX	Draft revisions to Brookdale RBGG website.	1.5	
4/11/2024	AX	Emails with team re meet and confer; replacement for HWD depositions.	0.2	
4/11/2024	AX	Prepare for meeting with Loresia Vallette re update to interrogatory and Requests for Production responses.	0.5	
4/11/2024	AX	Review and revise Dr. Barchuk expert report.	1.2	
4/11/2024	KES	Confirm service of subpoena, prepare and service NOD of Catherine Squires.	0.4	
4/11/2024	KES	Emails with co-counsel re upcoming depositions and scheduling and calendar dates.	0.5	
4/11/2024	KES	Arrange court reporters for upcoming depositions.	0.3	
4/11/2024	KES	Complete redactions of supplemental Jestrabek-Hart production and arrange for production.	2.7	
4/11/2024	KES	Confer AS and review docs re upcoming HWD depositions.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 875

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2024	GCG	Conf w/ BBK re deposition meet and confer.	0.1	
4/12/2024	GCG	Emails to KES and team re BJH document production.	0.1	
4/12/2024	GCG	Meet w/ SW team re ongoing discovery and expert report writing.	0.5	
4/12/2024	GCG	Meet w/ RBGG team re same.	0.5	
4/12/2024	BBK	Preparing Pls' portion of Letter Brief re Former BD Employee Motion to Quash Deposition Subpoenas.	2.1	
4/12/2024	BBK	Phone call w/ GCG re depositions, discovery disputes, and expert reports.	0.1	
4/12/2024	BBK	Phone call w/ access expert G. Waters re reports from re-inspections of BD Fountaingrove and Tracy.	0.2	
4/12/2024	BBK	Preparing list of access barriers encountered by named Pls in their resident rooms at BD Fountaingrove for G. Waters.	0.4	
4/12/2024	BBK	Emailing w/ R. Steyer re following-up w/ Ds on production of residency agreements for current residents at the four facilities operated by BD.	0.1	
4/12/2024	BBK	Preparing for meet and confer w/ Ds re C. Squires deposition subpoena.	0.2	
4/12/2024	BBK	Meet and confer w/ Ds re C. Squires deposition subpoena.	0.3	
4/12/2024	BBK	Phone call w/ AX to debrief re meet and confer w/ Ds re C. Squires deposition subpoena and re: finalizing supp Rog responses.	0.5	
4/12/2024	BBK	Drafting/sending update to co-counsel and RBGG team re meet and confer w/ Ds re C. Squires deposition subpoena and recommended compromise offer.	0.2	
4/12/2024	BBK	Phone call w/ AHS re preparing for HWD depositions and drafting outline and IDing exhibits for same.	0.6	
4/12/2024	BBK	Emailing w/ AX and G. Wallace re questions re finalizing 2d supp ROG responses.	0.2	
4/12/2024	BBK	Meeting w/ co-counsel and RBGG team re depositions, ROG responses, and expert reports.	0.8	
4/12/2024	BBK	Emailing w/ G. Wallace and AX re FU w/ access expert J. Mastin re status of re-inspection reports for BD Brookhurst and Hemet.	0.1	
4/12/2024	BBK	Conferring w/ AX & R Steyer re finalizing landing page on RBGG website for case for outeach to putative class members.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2024	BBK	Drafting/revising/sending email to opposing counsel w/ proposed compromise re deposition of C. Squires (including emails w/ M. Johnson re same).	0.5	
4/12/2024	BBK	Drafting revisions to 2d supp Rog responses re: damages per discussion at co-counsel meeting.	0.5	
4/12/2024	BBK	Emailing w/ KES and R. Bonner re finalizing/serving supp doc production of B. Jestrabek-Hart emails.	0.1	
4/12/2024	BBK	Reviewing AHS report re PC relevant to upcoming deposition of BD Scotts Valley resident-declarant and emails w/ AX and R. Steyer re same.	0.1	
4/12/2024	BBK	Emailing w/ AHS/KES/DE re searching for potential ESI and other docs for HWD depositions.	0.1	
4/12/2024	AHS	Call with AX to prep for call with Loresia re: supplementing interrogatory responses.	0.3	
4/12/2024	AHS	Call with AX to debrief call with Loresia re: supplementing interrogatory responses.	0.2	
4/12/2024	AHS	Call with Loresia re: supplementing interrogatory responses.	0.8	
4/12/2024	AHS	Prep for call with LV.	0.3	
4/12/2024	AHS	Worked on HWD depo outline.	2.5	
4/12/2024	AHS	Call with BBK re HWD depositions.	0.6	
4/12/2024	AHS	Weekly call with co-counsel and GCG BBK AX KS DLE to discuss supplemental rog responses, depositions.	0.9	
4/12/2024	AHS	Updated case tasks list.	0.5	
4/12/2024	AHS	Intake call with rep. for putative class member and circulated notes from call to team.	0.5	
4/12/2024	AHS	Reviewed emails with team re: upcoming depos.	0.2	
4/12/2024	AHS	Call with AX re: HWD depo prep.	0.3	
4/12/2024	AX	Prepare for call with Loresia Vallette re Quinlan's interrogatory responses, including call with AS.	0.5	
4/12/2024	AX	Call with Loresia Vallette re interrogatory responses.	0.8	
4/12/2024	AX	Meet and confer with Brookdale re HWD depositions.	0.4	
4/12/2024	AX	Debrief call with BBK re M&C, interrogatory responses, and other case issues.	0.6	
4/12/2024	AX	Emails to team re agenda issues for cocounsel meeting.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/12/2024	AX	Meeting with cocounsel re case issues, discovery cutoff, depositions, expert reports; meeting with RBGG team and GCG re expert report.	1.0	
4/12/2024	AX	Revise Bernie Jestrabek-Hart interrogatory responses and send emails to Guy re review of same.	0.5	
4/12/2024	AX	Draft email to team re question about happy camper depositions.	0.2	
4/12/2024	AX	Review and revise Dr. Barchuk expert report.	0.8	
4/12/2024	AX	Review emails from KES, BBK re production of Bernie Jestrabek-Hart documents in response to RPD.	0.2	
4/12/2024	AX	Call with AS re prep for HWD depositions.	0.3	
4/12/2024	AX	Emails re Brookdale website revisions.	0.2	
4/12/2024	KES	Gather documents to be posted on RBGG case landing page.	0.4	
4/12/2024	KES	Review documents for production; multiple emails and tcs with R. Bonner re production issues.	3.7	
4/12/2024	KES	Emails with R. Steyer re citation error in Defs docs and review docs re same.	0.5	
4/12/2024	KES	Zoom meeting with co-counsel re depos, discovery and expert reports.	1.0	
4/12/2024	KES	Review emails re upcoming depo issues.	0.1	
4/12/2024	KES	Emails with team re Tubbs fire video.	0.2	
4/12/2024	DLE	Attend and note-take weekly co-counsel meeting.	0.9	
4/12/2024	DLE	Organize and circulate notes from weekly co-counsel meeting.	0.5	
4/13/2024	GCG	Review and analyze team emails re happy camper and HWD depositions.	0.4	
4/13/2024	AHS	Draft deposition outline for Health and Wellness directors.	2.1	
4/13/2024	AX	Review GCG emails re interrogatory responses, happy camper depositions.	0.1	
4/14/2024	AHS	Edited HWD outline and sent to BBK.	0.6	
4/15/2024	GCG	Confs w/ and emails to JSY and BBK re preparation for deposition.	0.3	
4/15/2024	GCG	Review and revise draft Barchuk declaration.	0.6	
4/15/2024	GCG	Conf w/ and email to AX re same and re preparation for meeting.	0.2	
4/15/2024	GCG	Draft questions fro HWD depositions.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/15/2024	JSY	Emails re ROG supplementation.	0.2	
4/15/2024	JSY	Emails re doc production.	0.1	
4/15/2024	JSY	Emails re new counsel.	0.1	
4/15/2024	JSY	Emails re JA hospitalization and ROG supplementation.	0.1	
4/15/2024	JSY	Edit ML supp. ROG responses; emails re same.	1.0	
4/15/2024	BBK	Emailing w/ opposing counsel to confirm 4/17 and 4/19 depositions of HWDs and re: compromise proposal re 4/25 deposition of former Scotts Valley HWD.	0.1	
4/15/2024	BBK	Emailing RBGG team re priority tasks to prepare for upcoming depositions and finalize supp discovery responses from Pls.	0.2	
4/15/2024	BBK	Updating GCG and JSY re comm'ns w/ access experts on draft reports re re-inspections.	0.1	
4/15/2024	BBK	Revising/commenting on M. Johnson draft letter brief opposing Ds' motion to quash deposition subpoenas (conferring w/ RBGG team, M. Johnson and G. Wallace re further revisions to same).	1.7	
4/15/2024	BBK	Emailing R. Bonner and RBGG team re locating documents for 4/23 deposition of B. Kumar.	0.2	
4/15/2024	BBK	Emailing w/ GCG and AX re status of case issues.	0.1	
4/15/2024	BBK	Reviewing JSY update re: Algarme health; conferring w/ RBGG team re outreach to putative class members; comm'ns w/ KES re finalizing/serving supp prod of BJH emails; reviewing GCG-AX emails re Barchuk expert report.	0.2	
4/15/2024	BBK	Preparing for V. Mathangani deposition (including preparing outline; analyzing docs; conferring w/ AX, AHS, and JSY).	7.5	
4/15/2024	BBK	Conferring w/ AHS, KES and DE re documents to locate for HWD depositions on 4/19, 4/25 and 4/30.	0.3	
4/15/2024	AHS	Emailed team and reviewed emails with opposing counsel re: upcoming depos and motion to quash.	1.2	
4/15/2024	AHS	Emailed GCG and co-counsel re: resident declarant depos.	0.4	
4/15/2024	AHS	Emailed with team re supplemental document production.	0.3	
4/15/2024	AHS	Reviewed documents to use during Mathangani depo.	1.0	
4/15/2024	AHS	Drafted questions for Mathanghani's deposition.	1.9	
4/15/2024	AHS	Emailed with BBK re: HWD depos.	0.3	
4/15/2024	AX	Emails with team re project status.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/15/2024	AX	Emails with team re class mailer and updated website for outreach.	0.2	
4/15/2024	AX	Review and revise Barchuk expert report and review related FSP materials.	2.5	
4/15/2024	AX	Emails with team re interrogatory responses.	0.3	
4/15/2024	KES	Finalize and serve Jestrabek-Hart supplemental production.	1.3	
4/15/2024	KES	Download and circulate pleading.	0.1	
4/15/2024	KES	Review and gather documents for upcoming depositions.	3.6	
4/15/2024	DLE	Create saved searches and review emails in Relativity for 2 potential deponent HWDs.	1.2	
4/15/2024	DLE	Call with KES re saved searches for potential deponents.	0.2	
4/16/2024	GCG	Conf w/ JSY and emails to GW and team re potential request for extension.	0.3	
4/16/2024	GCG	Prepare for and conduct meeting w/ expert AB and AX.	0.9	
4/16/2024	JSY	Conf. w/ GCG two times re case schedule; research re same.	0.5	
4/16/2024	JSY	Emails re depo schedule and motion to quash.	0.1	
4/16/2024	JSY	Review and edit HWD depo outline; emails re same.	0.6	
4/16/2024	JSY	Conf. w/ BBK re depo outline.	0.1	
4/16/2024	JSY	Messages re depo prep.	0.1	
4/16/2024	BBK	Reviewing M. Johnson-E. Rutner emails re deposition of former San Ramon ED set for 4/18 and conferring w/ JSY re same; emailing w/ opposing counsel re 4/17 and 4/19 depositions and production of residency agreements for current residents.	0.2	
4/16/2024	BBK	Emailing w/ G. Wallace and B. Umpierre re DSS citations re caregiver understaffing at Six Facilities during individual Plaintiffs' residencies for Flores Expert Report.	0.1	
4/16/2024	BBK	Conferring w/ KES re FU w/ ACE re service of deposition subpoena on former San Ramon HWD C. Appeal reviewing KES emails w/ court reporter service and process server re same.	0.2	
4/16/2024	BBK	Conferring w/ GCG and JSY re G. Wallace email re: seeking extension of fact discovery deadline; reviewing GCG-GW emails re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 880

SERVICES

Date	Person	Description of Services	Hours	Discount
4/16/2024	BBK	Reviewing E. Rutner email re: proposed compromise re replacement deponent in lieu of motion to quash deposition subpoena for 4/25 deposition of C. Squire and making recommendations to RBGG team and co-counsel re same.	0.3	
4/16/2024	BBK	Drafting/sending email to E. Rutner re: proposed compromise re replacement deponent in lieu of motion to quash deposition subpoena.	0.1	
4/16/2024	BBK	Conferring w/ AHS re plan for former Scotts Valley HWD deposition.	0.3	
4/16/2024	BBK	Reviewing G. Wallace comments on draft 2d supp rog responses for P Lindstrom and BJH.	0.2	
4/16/2024	BBK	Preparing for V. Mathangani deposition (including meetings w/ team re same; preparing exhibits, drafting and revising outline).	6.8	
4/16/2024	AHS	Discussed upcoming depositions and related prep with DLE.	0.2	
4/16/2024	AHS	Conf. w/KS about declarant depo and doc review for Bernie.	0.2	
4/16/2024	AHS	Reviewed e-mails with opposing counsel and co-counsel re: depositions and motions to quash.	0.3	
4/16/2024	AHS	Discussed deposition prep for Mathanghani depo with BBK.	1.3	
4/16/2024	AHS	Organized materials and documents for Gordon-Alvarez's depo.	0.9	
4/16/2024	AX	Meeting with Alex Barchuk, GCG re expert report.	0.9	
4/16/2024	AX	Review draft deposition outline for Valentin Mathangani and provide comments; emails re same with BBK.	0.8	
4/16/2024	AX	Research and revise Barchuk expert report; email with GCG re same; prepare for meeting with Barchuk and GCG.	2.0	
4/16/2024	AX	Emails with team re exhibits to Barchuk report, Dimple Kamdar deposition.	0.4	
4/16/2024	KES	Emails with R. Steyer and court reporter re depo logistics.	0.4	
4/16/2024	KES	Email team re hearing transcripts.	0.1	
4/16/2024	KES	Emails to staff re on-site depo arrangements.	0.2	
4/16/2024	KES	Follow up re service of depo subpoena.	0.1	
4/16/2024	KES	Confer team and email court reporter re location of Kumar depo.	0.2	
4/16/2024	KES	Create Sharefile for docs for expert Barchuk.	0.2	
4/16/2024	KES	WL research re potential deponent Carole Presley.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/16/2024	KES	Review team emails re depo negotiations.	0.2	
4/16/2024	DLE	Prepare hard copies of exhibit folders for BBK's upcoming HWD deposition.	1.5	
4/16/2024	DLE	Pull clean version of exhibit for BBK upcoming HWD deposition.	0.3	
4/16/2024	DLE	Meeting with AHS to discuss case issues and tasks.	0.2	
4/17/2024	GCG	Confs w/ JSY re HWD deposition.	0.2	
4/17/2024	GCG	Conf w/ AX re expert report.	0.1	
4/17/2024	GCG	Review and revise expert report.	0.5	
4/17/2024	JSY	Emails and conf. re depo notices and service.	0.2	
4/17/2024	JSY	Multiple conf. during breaks of HWD deposition and after with BBK and AHS.	1.5	
4/17/2024	JSY	Conf. w/ BBK and AS re ROG responses.	0.1	
4/17/2024	JSY	Review docs from ML; emails re same.	0.4	
4/17/2024	JSY	Emails re doc production and ROG response supplementation.	0.2	
4/17/2024	BBK	Reviewing E. Rutner email re: substituting deposition of current BD employee for former HWD and re: final meet and confer on Ds' motion to quash; emailing w/ co-counsel and RBGG team re same.	0.1	
4/17/2024	BBK	Preparing for V. Mathangani deposition.	1.4	
4/17/2024	BBK	Deposing V. Mathangani (including strategy meetings at breaks).	3.8	
4/17/2024	BBK	Debriefing w/ AHS and KES re Mathangani deposition.	0.3	
4/17/2024	BBK	Conferring w/ KES re service of NOD for C. Presley in lieu of deposition of C. Squires.	0.1	
4/17/2024	BBK	Conferring w/ KES re attempts to complete service of deposition subpoena on C. Appeal; reviewing/revising draft cover letter to C. Appeal re same.	0.2	
4/17/2024	BBK	Reviewing Ds' Reply ISO Motion to Quash Deposition Subpoena and M. Johnson-E. Rutner emails re dispute over whether filing same stays noticed depositions.	0.2	
4/17/2024	BBK	Assigning KES to prepare/send electronic versions of Mathangani deposition exhibits for court reporter and reviewing/approving same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2024	BBK	Emailing w/ G. Wallace, M. Johnson, JSY and AHS re meeting on 4/18 re strategy for 4/19 deposition of current San Ramon HWD.	0.3	
4/17/2024	BBK	Reviewing emails re: M. Lytle supp doc production, status of Pls' supp ROG responses, Barchuk expert report, and DSS citations related to caregiver understaffing at Six BD Facilities during Pls' residencies.	0.2	
4/17/2024	AHS	Prep. for deposition of Valentine Mathangani.	0.8	
4/17/2024	AHS	Attend deposition of Mathangani.	3.7	
4/17/2024	AHS	Discussed deposition with BBK and KS.	0.2	
4/17/2024	AHS	Reviewed emails between team, co-counsel, and opposing counsel.	0.5	
4/17/2024	AHS	Revised deposition outline for Gordon-Alvarez.	1.5	
4/17/2024	AHS	Edited deposition outline for Gordon-Alvarez.	1.2	
4/17/2024	AX	Review emails from team and opposing counsel re M&C status, motion to quash, and depositions.	0.4	
4/17/2024	AX	Revise Barchuk report following call with Dr. Barchuk, GCG.	1.8	
4/17/2024	AX	Review emails re deposition of Mathangani, access report drafts.	0.2	
4/17/2024	KES	Review and organize client Lytle documents for upload to Relativity for production.	0.7	
4/17/2024	KES	Review emails from process server re unsuccessful service on Appeal; confer BBK re same; draft and send letter with subpoena to Appeal by Fedex.	1.2	
4/17/2024	KES	Organize and send electronic copies of Mathangani depo exhibits to court reporter.	0.8	
4/17/2024	KES	Download and circulate pleading.	0.1	
4/17/2024	KES	Email co-counsel re service copy of pleading.	0.1	
4/17/2024	KES	Draft, finalize and serve NOD of Carole Presley.	0.4	
4/17/2024	KES	Schedule court reporter for Presley.	0.1	
4/17/2024	KES	Review exemplars of expert testimony history and review WL references re expert Barchuk.	0.6	
4/17/2024	KES	Continue review of client docs for supplemental production.	1.0	
4/17/2024	DLE	Schedule and reserve conference room for upcoming HWD deposition.	0.5	
4/18/2024	GCG	Revise draft expert report.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 883

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2024	GCG	Conf w/ and email to AX re same.	0.2	
4/18/2024	GCG	Revise FSP PMK questions.	0.1	
4/18/2024	GCG	Confs w/ JSY and KES re discovery orders.	0.1	
4/18/2024	GCG	Email to BBK and AS re HWD deposition.	0.1	
4/18/2024	JSY	Meeting re HWD depos.	0.5	
4/18/2024	JSY	Conf. w/ BBK re ROG responses.	0.5	
4/18/2024	JSY	Conf. w/ GCG re order re ROGs and depositions.	0.2	
4/18/2024	JSY	Messages and emails re order re discovery disputes; review same.	0.3	
4/18/2024	JSY	Emails re depositions.	0.1	
4/18/2024	JSY	Edit ROG responses; multiple emails and messages re same.	1.0	
4/18/2024	BBK	Emailing w/ KES and DE re identifying documents and potential exhibits for 4/23 B. Kumar deposition.	0.2	
4/18/2024	BBK	Emailing w/ RBGG team and co-counsel re prep for 4/19 deposition of J. Gordon Alvarez.	0.3	
4/18/2024	BBK	Meeting w/ AHS, JSY, GW, and MJ re plan for 4/19 deposition of J. Gordon Alvarez.	0.7	
4/18/2024	BBK	Reviewing/revising/commenting on AHS draft outline for 4/19 deposition of J. Gordon Alvarez.	1.3	
4/18/2024	BBK	Reviewing G. Wallace proposed lines of questioning 4/19 deposition of J. Gordon Alvarez; conferring w/ AHS re same.	0.2	
4/18/2024	BBK	Phone meeting w/ JSY re supp ROG responses, depositions, and expert reports.	0.5	
4/18/2024	BBK	Preparing/sending assignment to DE to ID DSS citations against 4 facilities operated by BD since spring 2022 for Flores Expert Report; updating GW re same.	0.2	
4/18/2024	BBK	Emailing w/ GW re recent Sup Ct opinion that supports ADA standing for Reply ISO Class Cert.	0.1	
4/18/2024	BBK	Conferring w/ KES/DE re obtaining/uploading to TextMap depo transcripts for R. Stiner ,V. Mathangani, and resident-declarants.	0.1	
4/18/2024	BBK	Reviewing Court's Discovery Order re interrogatories and depositions; conferring w/ RBGG team re same.	0.3	
4/18/2024	BBK	Emailing w/ RBGG team re resident-declarant depositions allowed by Court's Order.	0.2	
4/18/2024	BBK	Reviewing draft Barchuk Expert Report.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2024	BBK	Analyzing Fountaingrove re-inspection report for Carlson 2d Supp Rog responses.	1.0	
4/18/2024	BBK	Reviewing AHS update re analysis/production of BJH text messages; R. Steyer email to Ds re production of account history reports for named Pls; emails w/ opposing counsel re supp doc production of updated Fleet Safety Policy and related materials.	0.2	
4/18/2024	BBK	Reviewing/responding to GCG query re HWD depositions.	0.1	
4/18/2024	AHS	Emailed with team re: supplemental doc production.	0.2	
4/18/2024	AHS	Further revised Gordon-Alvarez deposition outline.	0.5	
4/18/2024	AHS	Emailed ML DLE KS re: setting up conference room and preparing exhibits for depo of Gordon-Alvarez.	0.3	
4/18/2024	AHS	Prepared for call with co-counsel re: Gordon-Alvarez depo.	0.2	
4/18/2024	AHS	Call with co-counsel re: Gordon-Alvarez depo.	0.7	
4/18/2024	AHS	Talked to KS re: depo exhibits.	0.2	
4/18/2024	AHS	Discussed deposition strategy with MJT.	0.1	
4/18/2024	AHS	Reviewed emails from team: re deposition.	0.2	
4/18/2024	AHS	Updated deposition outline based on team call.	2.0	
4/18/2024	AHS	Read transcript of Stacia Stiner deposition.	0.2	
4/18/2024	AHS	Finalized exhibits for Gordon-Alvarez deposition.	0.7	
4/18/2024	AHS	Updated case tasks list with all upcoming discovery deadlines.	0.1	
4/18/2024	AHS	Discussed supplemental rogs for Loresia Valette with AX.	0.2	
4/18/2024	AHS	Incorporated BBK edits into depo outline.	1.4	
4/18/2024	AHS	Emailed with GCG and BBK re: deposition outline.	0.3	
4/18/2024	AX	Emails with team re drafting testimony roster; draft same.	1.5	
4/18/2024	AX	Call with GCG re updates to Barchuk report.	0.2	
4/18/2024	AX	Emails with team re Fleet Safety 30b6 deposition; draft questions for deposition.	0.5	
4/18/2024	AX	Review emails and documents re FSP production and policy change.	0.3	
4/18/2024	AX	Review emails from team re review of BJH text messages.	0.2	
4/18/2024	KES	Download Mathangani depo package and circulate transcript to team.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/18/2024	KES	Emails with DE re gathering and review of docs for Kumar depo.	0.2	
4/18/2024	KES	Emails with co-counsel re Stiner depo transcript.	0.1	
4/18/2024	KES	Emails with DE re uploading depo transcripts to TextMap.	0.3	
4/18/2024	KES	Download and circulate discovery order and confer team re same.	0.3	
4/18/2024	KES	Cancel Squires depo and conference room.	0.2	
4/18/2024	KES	Review additional documents for potential use at depo and prepare exhibits for depo of Jennifer Gordon-Alvarez.	3.6	
4/18/2024	KES	Continue review of client documents for supplemental production.	1.2	
4/18/2024	DLE	Calls with KES re deposition prep and transcript tasks.	0.2	
4/18/2024	DLE	Prepare for upcoming ED deposition by pulling and organizing relevant documents for potential exhibits.	2.0	
4/18/2024	DLE	Upload and circulate transcripts from happy camper depositions.	0.7	
4/19/2024	GCG	Review and analyze Judge Beeler discovery order.	0.2	
4/19/2024	GCG	Meet w/ SW co-counseling team re discovery issues and expert reports.	1.0	
4/19/2024	GCG	Follow up conference w/ RBGG re same.	0.1	
4/19/2024	GCG	Review AS report re deposition of health and wellness director.	0.1	
4/19/2024	GCG	Email to MJ and team re defendants' change in FSP.	0.1	
4/19/2024	JSY	Conf. w/ AS during and prior to deposition of HWD of San Ramon.	0.3	
4/19/2024	JSY	Conf. w/ KES re BJH doc production.	0.1	
4/19/2024	JSY	Team meeting.	1.0	
4/19/2024	JSY	Emails and conf. re re deposition.	0.3	
4/19/2024	JSY	Emails re ROG responses.	0.1	
4/19/2024	BBK	Reviewing AX and GCG proposed lines of questioning for 4/22 deposition of M. Johnson.	0.1	
4/19/2024	BBK	Analyzing DSS citation to BD San Ramon and conferring w/ AHS re strategy of using same in deposition of J. Gordon-Alvarez.	0.2	
4/19/2024	BBK	Drafting Carlson 2d Supp Rog Resps.	2.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2024	BBK	Emailing w/ co-counsel and RBGG team re BD's revision of Fleet Safety Policy and implications for certified class's claims.	0.2	
4/19/2024	BBK	Emailing w/ KES and DE re analysis of recent DSS citations to 4 named PI facilities operated by BD.	0.1	
4/19/2024	BBK	Reviewing KES update re review of BJH documents and texts for supp doc prod; reviewing emails w/ OC re M. Johnson deposition.	0.1	
4/19/2024	BBK	Conferring w/ AHS re J. Gordon Alvarez depo during breaks.	0.2	
4/19/2024	BBK	Meeting w/ co-counsel and RBGG team re discovery and expert reports and post-meeting debrief w/ RBGG team.	1.2	
4/19/2024	BBK	Emailing w/ AX/JSY/AHS re 2d supp ROG responses for named Pls.	0.2	
4/19/2024	BBK	Emailing w/ KES re cancellation of court reporter and deposition locations for B. Kumar and C. Squires depos.	0.1	
4/19/2024	BBK	Emailing w/ G. Wallace and JSY re 2d Supp Rog Resps re access barriers.	0.3	
4/19/2024	BBK	Drafting Lindstrom 2d Supp Rog Resps.	0.6	
4/19/2024	BBK	Emailing w/ P. Lindstrom and J. Carlson re meeting on finalizing 2d Supp Rog Resps.	0.2	
4/19/2024	BBK	Reviewing AHS summary of depo of J. Gordon Alvarez.	0.1	
4/19/2024	AHS	Final edits to deposition outline and exhibit organization.	2.0	
4/19/2024	AHS	Deposition of HWD Jennifer Gordon-Alvarez.	4.6	
4/19/2024	AHS	Discussed deposition with DLE.	0.2	
4/19/2024	AHS	Discussed deposition and co-counsel meeting with KS.	0.3	
4/19/2024	AHS	Reviewed emails re: interrogatory responses and FSP.	0.2	
4/19/2024	AHS	Emailed team with summary of deposition.	0.9	
4/19/2024	AHS	Updated case tasks list with status of discovery disputes and upcoming deadlines.	0.3	
4/19/2024	AX	Meeting with cocounsel and RBGG team re case strategy and ongoing projects.	1.5	
4/19/2024	AX	Call with DE re work on Barchuk report appendix.	0.3	
4/19/2024	AX	Emails with Dr. Barchukt re materials for expert report, time for meeting.	0.4	
4/19/2024	AX	Review court orders.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/19/2024	AX	Review summary of Gordon-Alvarez deposition and related team correspondence.	0.3	
4/19/2024	AX	Correspondence with team re interrogatory responses.	0.6	
4/19/2024	AX	Review Bernie Jestrabek-Hart text messages re interrogatory responses.	0.3	
4/19/2024	KES	Cancel court reporters and conference rooms for cancelled depos.	0.3	
4/19/2024	KES	Download and circulate Zahner transcript.	0.3	
4/19/2024	KES	Follow up re Stiner transcript.	0.2	
4/19/2024	KES	Update case calendar.	0.1	
4/19/2024	KES	Request expedited Gordon Alvarez transcript and confer AS re same.	0.2	
4/19/2024	KES	Follow up with team re happy camper deponent transcript review.	0.2	
4/19/2024	KES	Zoom meeting with co-counsel re discovery, depos and experts.	0.9	
4/19/2024	KES	Complete review and coding of client computer files for possible production and begin review of text messages.	2.5	
4/19/2024	KES	Review scope of prior DSS report downloads, confer DE re same and email BBK re same.	0.4	
4/19/2024	DLE	Preview reviewing named plaintiff text messages; confer with KES.	0.2	
4/19/2024	DLE	Partial attendance and assist with displaying exhibits for HWD deposition with AHS.	2.4	
4/19/2024	DLE	(Billing Judgment) Debrief HWD deposition with AHS.	0.0	0.6
4/20/2024	GCG	Review and analyze Kamdar deposition transcript.	0.4	
4/20/2024	JSY	Edit ROG responses for Lytle; emails re same.	0.5	
4/21/2024	GCG	Review and analyze interrogatory supplementation.	0.1	
4/21/2024	GCG	Email AX re same and re Barchuk report.	0.1	
4/21/2024	BBK	Emailing w/ co-counsel and RBGG team re plan for finalizing Lindstrom and Carlson 2d Supp Rog Resps.	0.1	
4/21/2024	BBK	Feviewing/sharing legal research re obtaining systemic injunctive relief on individual Pls' claims.	0.1	
4/22/2024	GCG	Review GW edits to Barchuk declaration.	0.3	
4/22/2024	GCG	Emails to AX re same and re supplemental interrogatory responses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/22/2024	JSY	Conf. w/ GW and BBK re ROG responses.	0.4	
4/22/2024	JSY	Conf. w/ AX re ROG responses.	0.3	
4/22/2024	JSY	Edit ROG responses; emails re same.	0.9	
4/22/2024	BBK	Conferring w/ JSY and GW re meeting on 2d supp rog resp.	0.2	
4/22/2024	BBK	Prep for meeting w/ JSY and GW on 2d supp rog resp.	0.1	
4/22/2024	BBK	Attending to payment of invoice for expedited transcript for 4/17 deposition.	0.1	
4/22/2024	BBK	Preparing for PC w/ P. Lindstrom re 2d Supp Rog Resp.	0.2	
4/22/2024	BBK	PC w/ P. Lindstrom re 2d Supp Rog Resp.	0.5	
4/22/2024	BBK	Meeting w/ GW and JSY re 2d Supp Rog Resp.	0.3	
4/22/2024	BBK	Emailing w/ KES re docs produced by P Lindstrom to confirm letter to Scotts Valley ED was produced.	0.2	
4/22/2024	BBK	Revising Lindstrom 2d Supp Rog Resp.	0.7	
4/22/2024	BBK	Emailing w/ RBGG team and co-counsel re plan for finalizing 2d Supp Rog Resp.	0.2	
4/22/2024	BBK	Emailing w/ KES re failure to serve depo subpoena on C. Appeal; updating RBGG team re same and re remaining depositions.	0.3	
4/22/2024	BBK	Emailing w/ GCG and RS re status of class mailer to putative class members.	0.2	
4/22/2024	BBK	Conducting analysis of DSS citations to facilities where named Pls' reside(d) since BBK Reply Decl; sharing same w/ BU and GW for Flores Expert Report.	1.2	
4/22/2024	BBK	Conferring w/ team re GW proposed revisions and comments on Barchuk Expert Report.	0.2	
4/22/2024	BBK	Conferring w/ JSY/AX/AHS re updating 2d Supp Rog Resp.	0.2	
4/22/2024	BBK	Preparing for meeting w/ J & R Carlson re 2d Supp Rog Resp.	0.3	
4/22/2024	BBK	Phone call w/ J & R Carlson re 2d Supp Rog Resp.	1.2	
4/22/2024	BBK	Revising Carlson 2d Supp Rog Resp.	0.6	
4/22/2024	BBK	Emailing J. & R. Carlson and co-counsel/RBGG team re Carlson 2d Supp Rog Resp.	0.2	
4/22/2024	AHS	Talked to AX and JY re rog responses for Loresia Vallette.	0.5	
4/22/2024	AX	Revise Barchuk report; email correspondence with GCG re same.	1.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/22/2024	AX	Emails re revising Bernie Jestrabek-Hart interrogatories; revision of same.	1.5	
4/22/2024	AX	Draft Loresia Vallette interrogatories and emails/calls with AS, JSY re same.	1.8	
4/22/2024	AX	Observe PMK deposition of Michael Johnson and emails re same.	2.0	
4/22/2024	KES	Emails wtih court reporter re transcript packages.	0.2	
4/22/2024	KES	Confirm prior production of certain Lindstrom documents.	0.6	
4/22/2024	KES	Calendar expert deadlines.	0.2	
4/22/2024	KES	Confirm subpoena service failure and cancel depo.	0.2	
4/22/2024	KES	Additional review of client text messages for potential production.	0.5	
4/22/2024	DLE	Pull recent DSS citations from 4 facilities; send to BBK.	1.4	
4/22/2024	DLE	Save and circulate invoice delivery and legal research document.	0.4	
4/22/2024	DLE	Research re FSP expert testimony history and compile testimony roster.	2.3	
4/23/2024	GCG	Review and revise Barchuk declaration.	0.2	
4/23/2024	GCG	Conf w/ JSY re named plaintiff interrogatory supplementation.	0.1	
4/23/2024	GCG	Conf w/ KES re recent ECF filings.	0.1	
4/23/2024	GCG	Conf w/ JSY and AS re upcoming depositions.	0.1	
4/23/2024	JSY	Conf. w/ AHS re ROG supplementation and document productions.	0.4	
4/23/2024	JSY	Conf. w/ GCG re ROG supplementation and other case tasks.	0.2	
4/23/2024	JSY	Emails re ML ROGs.	0.1	
4/23/2024	JSY	Conf. w/ ML re ROG responses.	0.1	
4/23/2024	JSY	Edit ROG responses and multiple emails re same.	0.4	
4/23/2024	BBK	Conferring w/ JSY re plan for supp disc responses and 4/26 deposition.	0.1	
4/23/2024	BBK	Emails w/ OC re supp doc production and docs omitted from prior productions.	0.1	
4/23/2024	BBK	Reviewing/commenting on draft Vallette 2d Supp Rog Resps; emailing w/ team re need to revise same.	0.5	
4/23/2024	BBK	Emailing w/ P. Lindstrom re finalizing 2d Supp Rog Resps.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/23/2024	AHS	Reviewed emails re: supplemental rog responses for named plaintiffs.	0.2	
4/23/2024	AHS	Sent co-counsel exhibits from Friday's deposition.	0.2	
4/23/2024	AHS	Reviewed partial draft of Loresia Vallette's supplemental rog responses.	0.2	
4/23/2024	AHS	Conf. w/ with JY to discuss supplemental rog responses, document production, and upcoming deposition.	0.4	
4/23/2024	AHS	Conf. w/ KS re supplemental doc production for Bernie Jestrabek-Hart.	0.4	
4/23/2024	AHS	Updated Loresia's supplemental rog responses.	2.2	
4/23/2024	AHS	Conf. w/ KS re deposition of Carole Presley.	0.1	
4/23/2024	AHS	Reviewed team emails re: standardizing supplemental rog responses and wrote with input.	0.7	
4/23/2024	AHS	Emailed with AX and JY re Loresia's supplemental rogs /.	0.3	
4/23/2024	AHS	Conducted final proofread and edits to supplemental rogs for Loresia Vallette and then circulated to team.	1.0	
4/23/2024	AHS	Revised Loresia's supplemental rog responses in response to comments and recirculated to team.	0.7	
4/23/2024	AX	Review draft Barchuk report and email correspondence with GBW, GCG.	0.4	
4/23/2024	AX	Review draft Barchuk report and send to Dr. Barchuk; email correspondence re same.	0.2	
4/23/2024	KES	Confer AS re client text messages.	0.3	
4/23/2024	KES	Review depo invoice.	0.1	
4/23/2024	KES	Download and circulate pleading.	0.1	
4/23/2024	DLE	Research re FSP expert testimony history and compile testimony roster.	4.1	
4/24/2024	GCG	Prepare for and conduct meeting w/ AB and AX re AB report.	0.9	
4/24/2024	GCG	Email w/ GW and AX re same.	0.2	
4/24/2024	JSY	Emails re finalizing and serving ROG responses.	0.2	
4/24/2024	BBK	Emailing w/ co-counsel re scope of Quinlan's claims.	0.1	
4/24/2024	BBK	Emailing w/ co-counsel/RBGG team re responding to opposing counsel query re: deposition of C. Appeal.	0.2	
4/24/2024	BBK	Reviewing emails w/ opposing counsel re production of BD docs re: named Pls' omitted from prior productions.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 891

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2024	BBK	Emailing w/ Steno to confirm 4/26 deposition of C. Presley.	0.1	
4/24/2024	BBK	Phone call w/ P. Lindstrom re 2d Supp Rog Resps.	0.4	
4/24/2024	BBK	Emailing w/ P. Lindstrom re finalizing 2d Supp Rog Resps.	0.1	
4/24/2024	BBK	Emailing w/ J. Carlson re 2d Supp Rog Resps.	0.2	
4/24/2024	BBK	Reviewing/responding to J. Thornton queries re DSS citations for Flores Expert Report.	0.3	
4/24/2024	BBK	Conferring w/ JSY/AHS/AX/KES re finalizing/serving supp Rog resps.	0.3	
4/24/2024	BBK	Emailing w/ RBGG team re comm'ns w/ L. Vallette re Quinlan's claims.	0.2	
4/24/2024	BBK	Emailing w/ RBGG team re plan for analyzing BJH text messages and other docs and completing supp doc prod.	0.2	
4/24/2024	BBK	Revising/finalizing Carlson and Lindstrom 2d Supp Rog Responses.	2.6	
4/24/2024	BBK	Preparing verification forms for Carlson and Lindstrom 2d Supp Rog Responses.	0.2	
4/24/2024	BBK	Finalizing Carlson and Lindstrom 2d Supp Rog Responses.	0.1	
4/24/2024	BBK	Attending to sending verification forms and final Rog Responses to J. Carlson and P. Lindstrom.	0.3	
4/24/2024	BBK	Emailing w/ RBGG team re signed verification forms from named Pls for 2d Supp Rog Resps.	0.1	
4/24/2024	BBK	Emailing w/ RBGG team and co-counsel re Fleet Safety Policy versions for expert review.	0.1	
4/24/2024	AHS	Emailed and discussed with team status of and next steps for rog responses and expert reports.	0.4	
4/24/2024	AHS	Emailed with team re: rog responses.	0.1	
4/24/2024	AHS	Finalized Loresia's supplemental rogs and verification form to send for her signature.	1.0	
4/24/2024	AHS	Reviewed text messages for Bernie's supplemental response to RPD.	1.6	
4/24/2024	AHS	Wrote to Loresia re: signing verification for supplemental rog responses.	0.2	
4/24/2024	AHS	(Billing Judgment) Discussed status of discovery, expert report of Barchuk, and magistrate judge role with DLE.	0.0	0.8
4/24/2024	AHS	Reviewed Bernie's text messages for supplemental document production.	1.0	
4/24/2024	AX	Meeting with GCG, Alex Barchuk re review of expert report.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/24/2024	AX	Email correspondence with team re Barchuk report, interrogatory responses, deposition outline, and other case tasks.	0.5	
4/24/2024	AX	Email correspondence with GBW, MTJ, TC, GCG re FSP and Barchuk report draft.	0.5	
4/24/2024	AX	Email correspondence with BJH re interrogatory responses, revise responses.	0.5	
4/24/2024	AX	Email to GCG re Rule 26 requirements and research re same.	0.4	
4/24/2024	AX	Call with DE re Barchuk appendices.	0.3	
4/24/2024	KES	Download and circulate Gordon-Alvarez depo transcript and upload to TextMap.	0.3	
4/24/2024	KES	Finalize two plaintiff discovery responses.	0.3	
4/24/2024	KES	Review prior downloaded DSS reports in connection with van issue.	0.3	
4/24/2024	KES	Confer AS re client text messages and format of production.	0.4	
4/24/2024	KES	Email with L. Castro re filed pleadings.	0.2	
4/24/2024	DLE	(Billing Judgment) Meeting with AHS to discuss case developments and tasks.	0.0	0.8
4/24/2024	DLE	Call with AX to discuss expert testimony roster final steps.	0.4	
4/24/2024	DLE	Work on research re FSP expert testimony roster.	0.8	
4/25/2024	GCG	Review emails from BBK and ER re deposition location.	0.1	
4/25/2024	GCG	Emails to GW and team re expert reports.	0.1	
4/25/2024	JSY	Emails re settlement in similar case.	0.2	
4/25/2024	JSY	Review order re discovery disputes; emails re same.	0.2	
4/25/2024	JSY	Messages re depo prep.	0.1	
4/25/2024	BBK	Reviewing E. Rutner email demanding to move 4/26 Presley depo to Los Angeles; conferring w/ RBGG team re same.	0.2	
4/25/2024	BBK	Drafting email to RBGG team/co-counsel re E Rutner demand to move 4/26 deposition to LA and proposed response re same.	0.4	
4/25/2024	BBK	Conferring w/ KES re converting 4/26 deposition from in-person at RBGG to remote Zoom depo; reviewing emails re: confirmation of same by Steno.	0.2	
4/25/2024	BBK	Drafting/sending email response to E. Rutner re 4/26 deposition and invitation to Zoom deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2024	BBK	Meeting and emailing w/ AHS re plan for Presley deposition and commenting on outline for same.	0.2	
4/25/2024	BBK	Conferring w/ JSY re updating opposing counsel on Algarme's need to delay supp disc resp due to health issues.	0.1	
4/25/2024	BBK	Emailing w/ RBGG team and co-counsel re plan to finalize/serve 5 sets of 2d Supp Rog Reaps.	0.2	
4/25/2024	BBK	Conferring w/ AHS/AX and GW re damages expert Kennedy's review of Pls' 2d Supp Rog Reaps for expert report before finalized/served; attending to same.	0.4	
4/25/2024	BBK	Reviewing and attending to payment of invoice for expedited transcript for 4/19 deposition.	0.1	
4/25/2024	BBK	Emailing w/ GW re Ds' potential motion to decertify transportation class.	0.1	
4/25/2024	BBK	Analyzing Court's Discovery Order on remaining discovery disputes; summarizing and proposing next steps i/r/t same for RBGG team and co-counsel.	0.3	
4/25/2024	BBK	Reviewing GW - E Rutner emails re: Ds' planned request for status conference before Judge Gilliam ILO discovery order and intent to move for reconsideration and file FRCP 72 objections to same.	0.1	
4/25/2024	BBK	Meeting w/ AHS re implications of Discovery Order on case schedule and upcoming motion practice.	0.2	
4/25/2024	BBK	Conferring w/ co-counsel and RBGG team re strategy for addressing E. Rutner's request for status conference ILO Discovery Order and plan for meeting on same on 4/26.	0.2	
4/25/2024	BBK	Phone call w/ AX re implications of Court's Discovery Order and plan for expert reports and motion practice.	0.4	
4/25/2024	BBK	Meetings and emails w/ KES re analyzing and tagging B. Jestrabek-Hart documents and texts for production and for redactions.	0.4	
4/25/2024	BBK	Reviewing/responding to AHS strategy questions re Presley deposition.	0.2	
4/25/2024	BBK	Emailing w/ AX re obtaining signed verification from B. Jestrabek-Hart for 2d Supp Rog Reaps.	0.1	
4/25/2024	BBK	Reviewing/revising/commenting on AHS draft outline for Presley deposition.	0.8	
4/25/2024	BBK	Emailing w/ AHS and M. Johnson re strategy for Presley deposition and debrief re Feaster depo.	0.1	
4/25/2024	BBK	Reviewing R. Steyer email to opposing counsel re missing named P resident files and chart re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2024	BBK	Analyzing B. Jestrabek-Hart docs and texts for relevance and redactions for supp doc prod.	2.0	
4/25/2024	AHS	Conf. w/ BBK and JY re: Defendant's untimely refusal to produce deponent Carole Presley at the location where the deposition was agreed to and noticed.	0.5	
4/25/2024	AHS	Reviewed documents from Defendants' production re: Carole Presley to prep for deposition.	2.0	
4/25/2024	AHS	Conf. w/ KS re: speadsheet issue for Presley deposition.	0.2	
4/25/2024	AHS	Drafted depo outline for Presley.	3.8	
4/25/2024	AHS	Discussed discovery order with BBK.	0.3	
4/25/2024	AHS	Emailed with BBK about approach to the Presley depo.	0.2	
4/25/2024	AHS	Revised Presley depo outline based on additional exhibit.	0.8	
4/25/2024	AHS	Emailed with BBK and co-counsel re: final edits to the deposition outline and additional questions to add.	0.4	
4/25/2024	AHS	Revised depo outline.	1.2	
4/25/2024	AHS	Emailed with co-counsel re: Feaster depo.	0.4	
4/25/2024	AHS	Reviewing/revising/commenting on AHS draft outline for Presley depo.	0.7	
4/25/2024	AHS	Emailing w/ AHS and M. Johnson re strategy for Presley Depo and debrief re Feaster depo.	0.2	
4/25/2024	AHS	Reviewing R. Steyer email to opposing counsel re omitted docs from resident files of named Pls and attached chart re same.	0.1	
4/25/2024	AHS	Analyzing B. Jestrabek-Hart docs and texts for relevance and redactions for supp doc production.	2.1	
4/25/2024	AX	Call with Bernie Jestrabek-Hart re interrogatory responses.	0.8	
4/25/2024	AX	Make additional revisions to Bernie Jestrabek-Hart interrogatory responses based on call and emails with team re same.	0.6	
4/25/2024	AX	Evaluate exhibits for Barchuk report and send emails to team re creation of same.	0.5	
4/25/2024	AX	Revise Barchuk report and send email to team re status.	1.6	
4/25/2024	AX	Finalize Bernie Jestrabek-Hart interrogatory responses.	0.5	
4/25/2024	AX	Call with BBK re case tasks.	0.5	
4/25/2024	KES	Reschedule Presley depo as remote.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 895

SERVICES

Date	Person	Description of Services	Hours	Discount
4/25/2024	KES	Review status of Heredia case and download and circulate docs to team.	0.3	
4/25/2024	KES	Download and circulate discovery order and review team emails re same.	0.2	
4/25/2024	KES	Confer AS re Presley depo and exhibits; review and email re additional docs related to same.	0.9	
4/25/2024	KES	Emails with AX re docs for Barchuk.	0.2	
4/25/2024	KES	Finalize two discovery responses.	0.2	
4/25/2024	KES	Review docs and organize saved search in Relativity for BBK final review of BJH docs to produce.	1.0	
4/25/2024	DLE	Finalize expert testimony roster and send to KES, AX.	0.9	
4/26/2024	GCG	Review emails to GW, AX, MJ and team re AB and Flores reports.	0.1	
4/26/2024	GCG	Review AS report re CP deposition.	0.1	
4/26/2024	BBK	Meeting w/ AHS re plan for Presley deposition.	0.2	
4/26/2024	BBK	Conferring w/ AX re legal research on expert disclosures and rebuttal experts.	0.1	
4/26/2024	BBK	Meeting w/ AHS re Presley deposition during final break.	0.2	
4/26/2024	BBK	Reviewing G. Wallace for RBGG to prepare factual research project for C. Flores Expert Report; emailing w/ RBGG team re same.	0.2	
4/26/2024	BBK	Emailing w/ M. Johnson and AHS re Presley deposition.	0.1	
4/26/2024	BBK	Meeting w/ co-counsel re expert reports and discovery order.	0.9	
4/26/2024	BBK	Meeting w/ AHS re plan for factual research project for C. Flores Expert Report.	0.3	
4/26/2024	BBK	Conferring w/ AHS re legal research on expert disclosures and rebuttal experts.	0.2	
4/26/2024	BBK	Conferring w/ KES re preparing B. Jestrabek-Hart documents and texts for redaction and production; reviewing KES email to R. Bonner re same.	0.3	
4/26/2024	BBK	Conferring w/ KES re preparing final sets of 2d Supp Rog Responses for 5 named Plaintiffs for service on Ds; reviewing/approving same.	0.3	
4/26/2024	BBK	Emailing w/ team re transcript of M. Johnson/30(b)(6) deposition.	0.1	
4/26/2024	BBK	Conducting factual research project for C. Flores Expert Report.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/26/2024	BBK	Emails w/ team re revisions to Barchuk Expert Report and next steps for finalizing same.	0.2	
4/26/2024	AHS	Reviewed outline before deposition.	0.8	
4/26/2024	AHS	Incorporated final edits to outline and printed outline and exhibit for Presley depo.	0.5	
4/26/2024	AHS	Met with BBK to discuss deposition of Presley.	0.1	
4/26/2024	AHS	(Billing Judgment) Tutorial of steno Zoom app for remote deposition with Steno videographer.	0.0	0.3
4/26/2024	AHS	Took deposition of Carole Presley.	3.2	
4/26/2024	AHS	Attended part of weekly co-counsel meeting to discuss discovery order, meet & confer, and remaining tasks before the close of discovery.	0.6	
4/26/2024	AHS	Met with BBK to discuss expert reports and related research.	0.7	
4/26/2024	AHS	Discussed documents produced by Defs with KS.	0.2	
4/26/2024	AHS	Emailed co-counsel re: information from deposition.	0.2	
4/26/2024	AHS	Emailed team summary of Presley depo.	0.7	
4/26/2024	AX	Meeting with cocounsel re discovery issues, case strategy, and ongoing projects.	1.0	
4/26/2024	AX	Emails to team re status of Barchuk expert report.	0.7	
4/26/2024	KES	Zoom meeting with co-counsel re discovery and experts.	0.7	
4/26/2024	KES	Download, circulate and upload Johnson depo transcript to TextMap.	0.6	
4/26/2024	KES	Email and tc with AX re exhibits for Barchuk report.	0.4	
4/26/2024	KES	Email with L. Castro re prior depo transcripts.	0.2	
4/26/2024	KES	Prepare POS, finalize and serve supplemental rog responses.	1.0	
4/26/2024	KES	Confer BBK re client docs for production; check updated set and email R. Bonner re same.	0.6	
4/26/2024	KES	Emails with team re Presley depo and review docs referenced re same.	0.4	
4/28/2024	BBK	Conducting factual research project for C. Flores Expert Report.	1.4	
4/28/2024	BBK	Conferring w/ AHS re factual research project for C. Flores Expert Report.	0.1	
4/29/2024	GCG	Conf w/ JSY re expert reports and close of discovery.	0.2	
4/29/2024	JSY	Conf. w/ GCG re status of projects.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/29/2024	JSY	Meeting with BBK and AHS re outstanding projects.	0.5	
4/29/2024	JSY	Emails re discovery issues.	0.2	
4/29/2024	BBK	Reviewing Law360 Article on recent 9th Circuit published opinion re: (b)(2) and (b)(3) class certification that may be useful for Reply ISO motion to certify subclasses.	0.1	
4/29/2024	BBK	Conferring w/ JSY and AHS re case status and plan for meet and confer w/ Ds on Discovery Order and Ds' request for CMC.	0.2	
4/29/2024	BBK	Conferring w/ JSY and AHS re fact research project for C. Flores Expert Report.	0.2	
4/29/2024	BBK	Emailing w/ KES and R. Bonner re status of preparing B. Jestrabek-Hart supp doc production; updating JSY re same.	0.1	
4/29/2024	BBK	Conferring w R. Steyer and M. Johnson re fact research project for C Flores Expert Report.	0.2	
4/29/2024	BBK	Conducting fact research project for C Flores Expert Report (including incorporating AHS portion of same).	2.7	
4/29/2024	BBK	Emailing w/ G. Wallace and B. Umpierre re fact research project for C Flores Expert Report.	0.1	
4/29/2024	BBK	Reviewing/commenting on M. Johnson internal agenda for meet and confer w/ Ds re Discovery Orders.	0.2	
4/29/2024	BBK	Meet and confer w/ Ds re Discovery Orders.	0.6	
4/29/2024	BBK	Preparing notes from and high level summary of meet and confer w/ Ds re Discovery Orders for RBGG team and co-counsel.	0.3	
4/29/2024	BBK	Meeting w/ JSY and AHS re case priorities and immediate tasks.	0.5	
4/29/2024	BBK	Emailing w/ co-counsel re status of expert reports; reviewing JSY email to opposing counsel re status of Algarme supp disc responses.	0.1	
4/29/2024	BBK	Emailing AHS re preparing PRA requests.	0.2	
4/29/2024	BBK	Emailing w/ R. Steyer re status of supplemental disclosures.	0.1	
4/29/2024	BBK	Emailing w/ KES and AHS re redactions for B. Jestrabek-Hart text messages for supp doc prod.	0.2	
4/29/2024	AHS	Compiled selection of specific plaintiff experiences from pleadings to assist expert.	1.7	
4/29/2024	AHS	Finished compiling selected plaintiff experiences to assist expert.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/29/2024	AHS	Conf. w/ BBK and JY re plaintiff experience summarizing for expert.	0.2	
4/29/2024	AHS	Call with BBK and JY re: meet and confer with defendants and imminent tasks.	0.5	
4/29/2024	AHS	Emailed with KS and BBK re: redactions after reviewing supplemental document production of Bernie Jestrabek-Hart.	0.3	
4/29/2024	KES	Follow up with R. Bonner re status of client docs in Relativity.	0.2	
4/29/2024	KES	Draft list of docs for Barchuk report and review AX email re same.	0.6	
4/29/2024	KES	Redact client docs and text messages for production and emails with BBK and AS re same.	3.8	
4/29/2024	KES	Review emails re status of expert reports and disclosures.	0.2	
4/29/2024	DLE	Confer with KES re expert report tasks.	0.1	
4/30/2024	BBK	Emailing w/ team re deposition transcripts for Feaster, Presley, and resident-declarant Wahl.	0.1	
4/30/2024	BBK	Emailing w/ KES and R. Bonner re finalizing B. Jestrabek-Hart and M. Lytle supp doc prods.	0.3	
4/30/2024	BBK	Reviewing unsubstantiated DSS complaint from Scotts Valley recently posted on DSS website.	0.1	
4/30/2024	BBK	Emailing w/ G. Wallace re verifications for Supp Rog Resps.	0.1	
4/30/2024	BBK	Emails w/ G. Wallace, R. Steyer, and M. Johnson re materials for Kennedy Expert Report.	0.3	
4/30/2024	BBK	Emails w/ M. Johnson re scope of Kennedy Expert Report.	0.2	
4/30/2024	BBK	Emailing w/ co-counsel re finalizing/serving 2d Supp Rog Resp for S. Stiner.	0.1	
4/30/2024	BBK	Reviewing emails w/ opposing counsel re intent to file FRCP 72 objections to Discovery Order and Motion to Stay Enforcement of same.	0.2	
4/30/2024	BBK	Researching timing and procedure for opposing FRCP 72 objections to MJ Orders; reporting to team re same.	0.3	
4/30/2024	BBK	Reviewing Ds' FRCP 72 Objections to Discovery Order.	0.2	
4/30/2024	AHS	Emailed with expert re access barriers at Scotts Valley.	0.3	
4/30/2024	AHS	Emailed with KS and team re: transcript from Presley depo.	0.2	
4/30/2024	AHS	Talked to KS and reviewed redactions re supplemental document production for Bernie Jestrabek-Hart.	0.4	
4/30/2024	AHS	Review transcript from depo of Carole Presley; conf. w/ BBK and JY re same.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 899

SERVICES

Date	Person	Description of Services	Hours	Discount
4/30/2024	AHS	Reviewed materials re: Barchuk expert report.	0.5	
4/30/2024	AHS	Reviewed team e-mails re: discovery order and communications with opposing counsel.	0.4	
4/30/2024	KES	Download and circulate Wahl and Feaster transcripts and upload to TextMap.	0.5	
4/30/2024	KES	Emails with court reporter and circulate draft Presley transcript.	0.3	
4/30/2024	KES	Review uploaded Lytle docs and confer JY re same.	0.5	
4/30/2024	KES	Finalize redactions to Jestrabek-Hart docs, final review and arrange for production.	1.7	
4/30/2024	KES	Review and circulate new SV DSS complaint.	0.2	
4/30/2024	KES	Research missing case information for expert Barchuk testimony history.	1.0	
4/30/2024	KES	Download and circulate motion and calendar deadlines.	0.3	
5/1/2024	JSY	Emails re expert reports; review same.	0.3	
5/1/2024	JSY	Review ML documents for production; emails re same.	0.5	
5/1/2024	BBK	Emails w/ JSY and co-counsel re status of expert reports.	0.2	
5/1/2024	BBK	Meetings w/ KES re supplemental discovery productions and expert reports.	0.5	
5/1/2024	BBK	Emailing w/ KES and R. Bonner re finalizing and serving B. Jestrabek-Hart and M. Lytle supp doc prods; conferring w/ RBGG team re same.	0.3	
5/1/2024	BBK	Emails w/ co-counsel and opposing counsel re finalizing/serving expert reports and supporting docs and service of supp disc responses.	0.3	
5/1/2024	BBK	Emails w/ RBGG team re Ds' supp doc production and supp responses to RFAs and Rogs and expert reports.	0.2	
5/1/2024	AHS	Emailed with AX re contact with Bernie Jestrabek-Hart.	0.2	
5/1/2024	AHS	Updated class member contact memo and emailed team re caregiver concerns.	0.3	
5/1/2024	AHS	Researched expert disclosures.	1.5	
5/1/2024	KES	Review, finalize and produce additional client documents; multiple conferences with R. Bonner re same.	4.0	
5/1/2024	KES	Organize expert reports in electronic files.	0.3	
5/1/2024	KES	Additional research re Barchuk cases for testimony history.	0.4	
5/1/2024	DLE	Save and circulate recently served ROG responses.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 900

SERVICES

Date	Person	Description of Services	Hours	Discount
5/2/2024	GCG	Email to AS and team re legal research memo.	0.2	
5/2/2024	GCG	Conf w/ JSY re expert reports.	0.1	
5/2/2024	GCG	Conf w/ AS re revisions to AB expert report.	0.2	
5/2/2024	JSY	Emails re expert disclosures.	0.1	
5/2/2024	JSY	Emails re order re objections to MJ order.	0.1	
5/2/2024	JSY	Conf. w/ GCG re status of projects.	0.2	
5/2/2024	JSY	Emails re rebuttal expert research.	0.2	
5/2/2024	JSY	Check in with AHS re status of projects.	0.2	
5/2/2024	BBK	Reviewing Court Order denying Ds' FRCP 72 objections to Discovery Order and conferring w/ team re same; reviewing M. Johnson email to opposing counsel to M&C w/ Ds re compliance w/ same.	0.2	
5/2/2024	BBK	Emailing w/ RBGG team re Ds' expert disclosures.	0.1	
5/2/2024	BBK	Conferring w/ AHS re status of Barchuk Expert Report.	0.1	
5/2/2024	BBK	Reviewing/commenting on AHS legal research memo re opening v. rebuttal expert reports.	0.2	
5/2/2024	AHS	Review order denying Defs' Mot for Reconsideration and discussed with BBK and JY.	0.3	
5/2/2024	AHS	Conducted additional legal research on expert disclosures initially and on rebuttal.	1.7	
5/2/2024	AHS	Read team emails re: expert reports disclosed yesterday.	0.2	
5/2/2024	AHS	Draft memo re: expert disclosure requirements under FRCP 26.	2.5	
5/2/2024	AHS	Met with GCG to discuss Barchuk expert report.	0.3	
5/2/2024	AHS	Read team emails re: Barchuk materials and compiled additional follow up materials to send Dr. Barchuk.	1.2	
5/2/2024	AHS	Met with JY to discuss upcoming briefing and expert report work.	0.2	
5/2/2024	AHS	(Billing Judgment) Read JAMA article re: private equity owned hospital patient outcomes and circulated to team.	0.0	0.5
5/2/2024	KES	Continue online and PACER research to update Barchuk testimony history details.	2.5	
5/2/2024	KES	Review and gather Defs policies for expert review; confer AHS re same.	0.7	
5/2/2024	KES	Organize expert report materials.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 901

SERVICES

Date	Person	Description of Services	Hours	Discount
5/3/2024	GCG	Meet w/ SW team re ongoing discovery and trial preparation.	1.0	
5/3/2024	GCG	Review draft SJ motion.	0.2	
5/3/2024	GCG	Conf w/ JSY and BBK re plan for same and prep for meeting.	0.8	
5/3/2024	GCG	Research re expert AB.	0.1	
5/3/2024	GCG	Revise AB exhibits.	0.1	
5/3/2024	JSY	Team meeting.	1.3	
5/3/2024	JSY	Conf. w/ GCG re MSJ.	0.2	
5/3/2024	JSY	Meeting with BBK and GCG re MSJ.	0.5	
5/3/2024	BBK	Emailing w/ RBGG team re Barchuk expert report.	0.1	
5/3/2024	BBK	Meeting w/ co-counsel re discovery, expert reports, and upcoming briefing.	1.3	
5/3/2024	BBK	Reviewing M. Johnson draft internal agenda for 5/6 meet and confer w/ Ds re compliance w/ Discovery Orders and T. Close comments on same.	0.1	
5/3/2024	BBK	Emailing w/ co-counsel re negotiations over answers to Interrogatories re access barriers.	0.1	
5/3/2024	BBK	Conferring w/ JSY and AHS re deadlines for dispositive and Daubert motions.	0.1	
5/3/2024	BBK	Reviewing KES and AHS emails re recent deposition testimony re contract labor.	0.1	
5/3/2024	BBK	Emailing w/ JSY and GCG re plan for motion for partial summary judgment.	0.2	
5/3/2024	BBK	Meeting w/ JSY and GCG re motion for partial summary judgment.	0.6	
5/3/2024	BBK	Meeting w/ AHS re legal and factual research for motion for partial summary judgment.	0.5	
5/3/2024	BBK	Reviewing Ds' response to RFPs seeking photos/notes from Ds' access expert D. Anderson's inspections.	0.1	
5/3/2024	BBK	Drafting/sending email to KES re identifying updated access barriers for motion for partial summary judgment.	0.2	
5/3/2024	BBK	Drafting/sending email to AHS re factual and legal research assignments for motion for partial summary judgment.	0.2	
5/3/2024	AHS	Corresp. with GCG re: Dr. Barchuk materials.	0.3	
5/3/2024	AHS	Weekly meeting with co-counsel to discuss upcoming deadlines, discovery order, and meet & confer with defs set for 5/5.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
5/3/2024	AHS	Emailed team re: invoices from discovery vendor.	0.4	
5/3/2024	AHS	Emailed team re scheduling order and standing order.	0.4	
5/3/2024	AHS	Updated internal case tasks list re: upcoming deadlines and responsibility for various tasks.	0.4	
5/3/2024	AHS	Communicated with named plf Bernie Jestrabek-Hart.	0.2	
5/3/2024	AHS	Met with BBK to discuss motion for summary judgment.	0.5	
5/3/2024	AHS	Weekly co-counsel meeting.	0.0	0.2
5/3/2024	KES	Zoom meeting with co-counsel re discovery, expert reports, pre-trial.	1.4	
5/3/2024	KES	Brief review and textmap report re testimony re case issue.	0.3	
5/3/2024	KES	Research re expert AB.	0.2	
5/3/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.3	
5/3/2024	DLE	Organize and circulate notes from weekly co-counsel meeting.	0.3	
5/5/2024	GCG	Review and revise Barchuk report and exhibits threats.	1.3	
5/5/2024	GCG	Research and draft emails to co-counsel re Barchuk report.	0.5	
5/5/2024	GCG	Review and analyze court order rejecting defendants' appeal from MJ order.	0.1	
5/5/2024	GCG	Review and analyze Josh Allen expert report.	1.0	
5/5/2024	GCG	Review and analyze internal communications regarding expert rebuttal reports and meet and confer required by Judge Beeler's discovery order.	0.8	
5/5/2024	GCG	Emails and texts to JSY, BBK and AS re expert report and other issues.	0.3	
5/5/2024	GCG	Initial review of supplemental disclosures.	0.2	
5/5/2024	GCG	Email to GW re related case.	0.1	
5/5/2024	GCG	Email to KS re Allen report.	0.1	
5/5/2024	GCG	Review and analyze case deadlines.	0.2	
5/5/2024	JSY	Multiple emails re status of Barchuk report and other projects.	0.1	
5/5/2024	BBK	Reviewing emails re: Barchuk expert report; texting w/ GCG re case.	0.1	
5/6/2024	GCG	Conf w/ JSY and email to BBK re meet and confer w/ defendants.	0.1	
5/6/2024	GCG	Email from KES re barrier analysis.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/6/2024	JSY	Emails re barrier lists.	0.1	
5/6/2024	BBK	Reviewing M. Johnson - J. Bertino emails re: Schroyer doc production.	0.1	
5/6/2024	BBK	Emails w/ RBGG team re Barchuk Expert Report.	0.2	
5/6/2024	BBK	Emails w/ RBGG team re Ds' expert disclosures.	0.1	
5/6/2024	BBK	Reviewing AHS email re changes to Fleet Safety Policy from original to 2024 versions.	0.1	
5/6/2024	BBK	Preparing for meet and confer w/ Ds re compliance w/ Discovery Orders.	0.2	
5/6/2024	BBK	Meet and confer w/ Ds re compliance w/ Discovery Orders.	1.2	
5/6/2024	BBK	Debrief w/ G. Wallace, M. Johnson, and T. Close re meet and confer w/ Ds re compliance w/ Discovery Orders.	0.3	
5/6/2024	BBK	Emailing w/ KES and JSY re access barrier lists.	0.2	
5/6/2024	BBK	Reviewing/commenting on T. Close summary of meet and confer w/ Ds re compliance w/ Discovery orders.	0.2	
5/6/2024	BBK	Drafting/sending report to RBGG team re meet and confer w/ Ds re compliance w/ Discovery orders and recommended next steps.	0.4	
5/6/2024	BBK	Reviewing invoice from G. Waters re prepping FCP 26 expert report; conferring w/ GCG re same.	0.1	
5/6/2024	BBK	Updating/correcting case task list.	0.2	
5/6/2024	BBK	Reviewing emails between E. Rutner and M. Johnson re discovery disputes over scope of Ds' production.	0.1	
5/6/2024	AHS	Emails re deadlines for discovery and dispositive motions.	0.3	
5/6/2024	AHS	Organized materials for Dr. Barchuk to review.	0.2	
5/6/2024	AHS	Compared four versions of Fleet Safety Policy Defendants have produced.	1.5	
5/6/2024	AHS	Reviewed and edited Dr. Barchuk's draft report.	1.4	
5/6/2024	AHS	Review article comparing power chairs to electric wheelchairs.	0.2	
5/6/2024	AHS	Review notes from M&C with defendants.	0.4	
5/6/2024	KES	Emails with team re expert reports.	0.3	
5/6/2024	KES	Review court reporter invoices and emails with team re same.	0.3	
5/6/2024	KES	Review updated barrier lists and compare with prior versions in connection with summary judgment; confer BBK re same; begin new chart re select barriers re same.	1.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/7/2024	GCG	Confs and email to AS re Barchuk report.	0.5	
5/7/2024	GCG	Meet w/ Dr. Barchuk, AS and GW re report.	1.0	
5/7/2024	GCG	Review and revise Barchuk report.	0.5	
5/7/2024	GCG	Conf w/ and email to KES re listing of Barchuk testimony.	0.3	
5/7/2024	GCG	Conf w/ GW re trial preparation.	0.2	
5/7/2024	GCG	Review AS memo re FSP.	0.2	
5/7/2024	GCG	Review notes from meet and confer.	0.2	
5/7/2024	JSY	Conf. w/ GCG re status of discovery issues.	0.1	
5/7/2024	JSY	Emails re discovery issues.	0.1	
5/7/2024	BBK	Analyzing Ds' ltr re anticipated doc prods pursuant to April 25 discovery order.	0.2	
5/7/2024	BBK	Emailing w/ GCG and JSY re strategy re discovery disputes over Ds' anticipated doc prods pursuant to April 25 discovery order.	0.5	
5/7/2024	BBK	Emailing w/ KES re analysis of access barriers for motion for PSJ.	0.2	
5/7/2024	BBK	Emailing w/ RBGG team re prep for meeting w/ Barchuk and finalizing expert report.	0.2	
5/7/2024	BBK	Reviewing E. Rutner - M. Johnson emails re disc disputes.	0.1	
5/7/2024	AHS	Discussed Dr. Barchuk's expert materials with DLE.	0.1	
5/7/2024	AHS	Reviewed emails with co-counsel re 5/6 M&C discussion of discovery order.	0.4	
5/7/2024	AHS	Discussed barrier lists from expert reports with KS.	0.2	
5/7/2024	AHS	Checked in with JY and GCG re: call with Dr. Barchuk.	0.1	
5/7/2024	AHS	Call with GCG re: Barchuk report.	0.1	
5/7/2024	AHS	Edit paragraph in draft Barchuk report.	0.3	
5/7/2024	AHS	Located documents in preparation for call with Dr. Barchuk.	0.1	
5/7/2024	AHS	Call with Dr. Barchuk, GCG, and co-counsel to discuss Dr. Barchuk's expert report.	0.5	
5/7/2024	AHS	Located and sent GCG relevant documents for Barchuk expert report.	0.2	
5/7/2024	AHS	Updated memo assessing different versions of Brookdale's Fleet Safety Policy.	0.9	
5/7/2024	AHS	Emailed with GCG re: next steps for Barchuk expert report.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/7/2024	KES	Review testimony history and mark up for expert review; confer GCG and DE re same; review emails from expert assistant re same.	1.6	
5/7/2024	KES	Continue updating chart re select barriers for summary judgment and comparison with prior list numbers.	1.3	
5/7/2024	DLE	Download and circulate filed pleadings.	0.4	
5/8/2024	GCG	Confs w/ and emails to AS and KES re Barchuk research and revisions.	0.3	
5/8/2024	GCG	Conf w/ GW and MJ re request for extension of trial schedule.	0.3	
5/8/2024	GCG	Revise MJ email re same.	0.1	
5/8/2024	GCG	Confs w/ JSY re same and re FSP class definition.	0.2	
5/8/2024	GCG	Review BBK email re class definition.	0.1	
5/8/2024	JSY	Conf. w/ GCG re issues re FSP class list.	0.3	
5/8/2024	JSY	Emails re issues with FSP class list.	0.2	
5/8/2024	JSY	Conf. w/ GCG re case schedule adjustment.	0.3	
5/8/2024	JSY	Messages and emails re adjustment in case schedule and FSP class list.	0.2	
5/8/2024	JSY	Emails re class representatives.	0.1	
5/8/2024	BBK	Reviewing/responding to text from P. Lindstrom re case matters.	0.1	
5/8/2024	BBK	Conferring w/ team re scope of certified class and responding to G. Wallace re same.	0.3	
5/8/2024	BBK	Drafting proposed email to co-counsel re scope of certified class.	0.2	
5/8/2024	BBK	Reviewing M. Johnson emails w/ opposing counsel re discovery disputes over court-ordered production.	0.1	
5/8/2024	BBK	Conferring w/ KES re analysis of access barriers for motion for PSJ.	0.2	
5/8/2024	BBK	Reviewing emails w/ co-counsel re proposing stipulation to continue trial and pre-trial deadlines and proposed schedule for same.	0.2	
5/8/2024	BBK	Reviewing/responding to R. Steyer query re named Pls' residencies at BD facilities.	0.2	
5/8/2024	BBK	Conferring w/ JSY and AHS re request to continue trial and pre-trial dates and discovery disputes.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 906

SERVICES

Date	Person	Description of Services	Hours	Discount
5/8/2024	BBK	Reviewing emails from AHS and KES re analysis of medical studies for Barchuk Expert Report and prior expert testimony of Barchuk for exhibit to same.	0.1	
5/8/2024	BBK	Conferring w/ AHS re status of legal and factual research projects for motion for PSJ.	0.1	
5/8/2024	AHS	Reviewed emails with opposing counsel re: ongoing discovery disputes.	0.2	
5/8/2024	AHS	Emailed with GCG re: discovery vendor.	0.1	
5/8/2024	AHS	Review Michael Johnson materials in prepared for discussion of next steps on Barchuk expert report.	0.3	
5/8/2024	AHS	Met with GCG to discuss Barchuk expert report and edits to exhibits.	0.2	
5/8/2024	AHS	Research re expert AB.	0.4	
5/8/2024	AHS	Review of academic articles Barchuk sent.	0.2	
5/8/2024	AHS	Read through medical studies and publications sent by Dr. Barchuk and emailed notes to team.	1.4	
5/8/2024	AHS	Reviewed Michael Johnson deposition transcript for Barchuk expert report.	0.5	
5/8/2024	AHS	Discussed class list and upcoming deadlines with JY and BBK.	0.2	
5/8/2024	AHS	Reviewed PRAs to fire departments to adapt for updated requests.	0.2	
5/8/2024	AHS	Talked to KS re: trial dates.	0.2	
5/8/2024	KES	Gather and organize medical journals and articles sent by Dr. Barchuk.	0.4	
5/8/2024	KES	Update expert report Ex C re materials reviewed.	0.5	
5/8/2024	KES	Update 2024 barrier chart for summary judgment; confer BBK re same.	2.0	
5/8/2024	KES	Confer DE re gathering expert photos for summary judgment list.	0.2	
5/8/2024	KES	Begin gathering photos corresponding to barriers in summary judgment chart.	0.3	
5/8/2024	KES	Emails with team re outstanding information needed for expert testimony history and additional research re same.	0.6	
5/8/2024	DLE	Research re purchasing digital book for AHS legal research; send instructions to AHS.	0.3	
5/8/2024	DLE	Finalize and review expert testimony history document; send to KES.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 907

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2024	GCG	Review and revise Barchuk report and exhibits.	0.3	
5/9/2024	GCG	Confs w/ and emails to AS and KS.	0.3	
5/9/2024	GCG	Conf w/ JSY re plan for motion briefing and trial.	0.2	
5/9/2024	JSY	Emails re missing staffing data.	0.1	
5/9/2024	JSY	Conf. w/ JA and emails re same.	0.2	
5/9/2024	JSY	Emails re MSJ.	0.1	
5/9/2024	BBK	Reviewing email from opposing counsel re Schroyer doc production; conferring w/ JSY re same.	0.1	
5/9/2024	BBK	Reviewing M. Johnson draft motion for reconsideration of depositions of Omole and Rubin and comments on same.	0.2	
5/9/2024	BBK	Reviewing JSY update re Algarme discovery responses; G. Wallace email re Ds' anticipated summary judgment motion; GCG email re evidence ISO Pls' motion for partial summary judgment; and emails w/ co-counsel re Cross Expert Report and supplementation of Mastin and Waters expert reports.	0.2	
5/9/2024	AHS	Read emails with opposing counsel re: alleged errors in plfs' expert's production.	0.2	
5/9/2024	AHS	Updated legal research for motion for summary judgment.	1.1	
5/9/2024	AHS	Conf. w/ GCG re: book cited in Barchuk expert report.	0.1	
5/9/2024	AHS	Read excerpts of book cited in Barchuk report.	0.9	
5/9/2024	AHS	Emailed with GCG and Dr. Barchuk re materials reviewed.	0.3	
5/9/2024	AHS	Edited Dr. Barchuk's expert report.	1.9	
5/9/2024	AHS	Call with GCG re: edits to be made to Dr. Barchuk expert report and exhibits.	0.2	
5/9/2024	AHS	Updated Exhibit C to Dr. Barchuk's report.	0.3	
5/9/2024	AHS	Reviewed emails with co-counsel and opposing counsel re: errata in expert reports.	0.1	
5/9/2024	AHS	Summarized edits to Barchuk report and next steps and sent to GCG.	0.7	
5/9/2024	KES	TC expert assistant re missing testimony history information and update chart re same.	0.6	
5/9/2024	KES	Emails DE re updated BKD facility list status.	0.3	
5/9/2024	KES	Gather documents for expert and emails AS re same.	0.6	
5/9/2024	KES	Continue review and organization of photos related to barriers for summary judgment.	2.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 908

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2024	DLE	Research re police and fire departments for each of 6 facilities and PRA info; organize and send findings to AHS.	1.6	
5/9/2024	DLE	Draft 4 letters requesting access of public records to police departments that correspond with San Ramon, Scotts Valley, Fountaingrove, and Brookhurst facilities.	1.8	
5/10/2024	GCG	Email to GW re ER email re meet and confer.	0.1	
5/10/2024	GCG	Review documents for use in cross and Barchuk reports.	0.6	
5/10/2024	GCG	Review and revise cross report.	0.2	
5/10/2024	GCG	Review and revise Barchuk report.	1.5	
5/10/2024	GCG	Review and analyze draft motion for reconsideration of deposition denials.	0.2	
5/10/2024	GCG	Review and revise letter to defendants re discovery issues.	0.2	
5/10/2024	GCG	Meet w/ co-counsel and RBGG team re expert reports and case schedule.	0.5	
5/10/2024	GCG	Review and comment on proposed case schedule.	0.1	
5/10/2024	GCG	Confs w/ and emails to AS and DG re Barchuk exhibits and report.	0.3	
5/10/2024	GCG	Email to AB re same.	0.1	
5/10/2024	BBK	Reviewing emails w/ co-counsel re Cross and Barchuk expert reports; reviewing emails w/ opposing counsel and co-counsel re meeting and conferring on proposed continuance of trial and pre-trial dates and re: Schroyer supp doc prods.	0.2	
5/10/2024	BBK	Reviewing T. Close draft meet and confer letter w/ Ds re discovery disputes over court-ordered doc prod and comments re same.	0.2	
5/10/2024	AHS	Met with GCG to discuss fleet safety policy.	0.2	
5/10/2024	AHS	Reviewed emails with cocounsel re: expert reports and FSP.	0.3	
5/10/2024	AHS	Edited Dr. Barchuk's report in response to GCG comments.	0.4	
5/10/2024	AHS	Pulled and emailed additional documents to Dr. Barchuk.	0.2	
5/10/2024	AHS	Reviewed Johnson depo for consistency with Barchuk report.	0.7	
5/10/2024	AHS	Weekly meeting with GCG KS DLE and co-counsel to discuss expert reports and upcoming M&C with defendants.	0.6	
5/10/2024	AHS	Emailed with co-counsel re: weekly meetings.	0.2	
5/10/2024	AHS	Final review of Exhibit C to Barchuk report.	0.4	
5/10/2024	AHS	Reviewed DLE notes from co-counsel mtg.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/10/2024	AHS	Call with GCG re Exhibit C to Barchuk report.	0.2	
5/10/2024	AHS	Updated Exhibit C to Barchuk report.	0.4	
5/10/2024	AHS	Call with KS re Exhibit B to Barchuk report.	0.1	
5/10/2024	AHS	Final proofread and then sent near-final version of expert report and exhibits to GCG KS DLE.	0.2	
5/10/2024	AHS	Additional legal research into ADA Title III for motion for summary judgment.	0.6	
5/10/2024	AHS	Inserted factual citations to draft MSJ.	0.3	
5/10/2024	KES	Team Zoom re expert reports, case schedule.	0.4	
5/10/2024	KES	Update Barchuk expert testimony attachment and tc with case counsel re same.	0.8	
5/10/2024	KES	Continue gathering photos corresponding to barriers for summary judgment.	1.3	
5/10/2024	DLE	Attend and note-take weekly co-counsel meeting and firm only debrief.	0.6	
5/10/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting and firm only debrief.	0.3	
5/10/2024	DLE	Calls with county fire department re local info on PRA requests.	0.2	
5/10/2024	DLE	Draft 3 letters requesting public records from police/fire departments in named plaintiff facility districts.	1.3	
5/10/2024	DLE	Finalize expert testimony roster; send clean draft to KES and AHS.	0.8	
5/13/2024	GCG	Conf w/ and emails to AS re AB report issues.	0.4	
5/13/2024	GCG	Review AS notes on meet and confer w/ defendants.	0.2	
5/13/2024	GCG	Confs w/ JSY and BBK re same and re defendants' motion to clarify class definition.	0.3	
5/13/2024	JSY	Emails re sealing motion.	0.2	
5/13/2024	JSY	Conf. w/ GCG re expert report and other projects.	0.2	
5/13/2024	JSY	Emails re sealing.	0.2	
5/13/2024	JSY	Emails re meeting to discuss case schedule.	0.1	
5/13/2024	JSY	Messages re meet and confer with Defs.	0.2	
5/13/2024	BBK	Reviewing emails w/ opposing counsel re case schedule and Flores expert doc production; emailing w/ AHS re legal/factual research for motion for partial summary judgment; reviewing DE notes from 5/10 co-counsel call.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/13/2024	BBK	Emailing w/ team re Ds' request to stipulate to filing certain materials under seal for Opp to Motion to Certify Subclasses; reviewing JSY-MJacobsen emails re same.	0.2	
5/13/2024	BBK	Conferring w/ JSY and AHS re meet and confer w/ Ds re case schedule and re: discovery disputes.	0.3	
5/13/2024	BBK	Reviewing AHS email to RBGG team summarizing meet and confer w/ Ds re case schedule and re: discovery disputes; reviewing AHS-GCG emails re finalizing Barchuk Expert Report.	0.1	
5/13/2024	BBK	Phone call w/ GCG re class definition for certified class and Ds' anticipated motion for clarification re or amendment of same.	0.3	
5/13/2024	BBK	Reviewing/analyzing Ds' Motion to Clarify or Modify Certified Class Definition.	0.2	
5/13/2024	AHS	Met with GCG re: meeting with Dr. Barchuk.	0.1	
5/13/2024	AHS	Called Dr. Barchuk to set up a final meeting.	0.1	
5/13/2024	AHS	Emailed co-counsel re: today's M&C.	0.1	
5/13/2024	AHS	Reached out to Dr. Barchuk.	0.1	
5/13/2024	AHS	Meet and confer with opposing counsel.	1.0	
5/13/2024	AHS	Edited notes from M&C, in consultation with JY and BBK, and circulated to team.	0.8	
5/13/2024	AHS	Inserted record citations to draft motion for summary judgment.	0.2	
5/13/2024	AHS	Met with GCG to discuss final steps fro Dr. Barchuk's report.	0.1	
5/13/2024	KES	Download and circulate Presley depo transcript and upload to TextMap.	0.4	
5/13/2024	KES	Review summary of meet and confer.	0.1	
5/13/2024	KES	Complete Tracy photo sets for summary judgment.	1.2	
5/13/2024	KES	Review files re sealed status of certain documents.	0.3	
5/13/2024	DLE	Save and circulate recent letter from co-counsel to opposing counsel.	0.2	
5/13/2024	DLE	Review and compile Rule 26 expert report photographs by barrier and facility and save to internal folder.	1.4	
5/13/2024	DLE	Draft 4 additional PRA request letters to police and fire departments at districts with named plaintiff facilities; finalize all drafts and compile/send to AHS with questions for her review.	2.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/13/2024	DLE	Call city clerk offices re info on submitting PRA requests.	0.3	
5/14/2024	GCG	Review and revise Barchuk report and exhibits.	1.0	
5/14/2024	GCG	Meet w/ AB and AS re same.	0.5	
5/14/2024	GCG	Confs w/ and emails to AS re further revisions.	0.3	
5/14/2024	GCG	Emails to GW, MJ and team re same.	0.3	
5/14/2024	JSY	Conf. w/ team members re expert report and Defs' opposition.	0.3	
5/14/2024	JSY	Review Defs' opposition brief.	0.5	
5/14/2024	JSY	Team meeting re Opp to Motion for Cert. of subclasses.	1.0	
5/14/2024	JSY	Meeting with BBK and AS re tasks for Reply ISO class cert motion and Opp to motion to clarify re class definition.	0.8	
5/14/2024	JSY	Emails re sealing motion.	0.1	
5/14/2024	JSY	Messages re extension request.	0.2	
5/14/2024	BBK	Emails w/ co-counsel and RBGG team re Cross and Barchuk expert reports.	0.1	
5/14/2024	BBK	Emails w/ RBGG team re Opposition to Motion to Certify Subclasses and supporting pleadings.	0.2	
5/14/2024	BBK	Reviewing/analyzing Opposition to Motion to Certify Subclasses.	0.8	
5/14/2024	BBK	Preparing for meeting w/ co-counsel re Reply ISO Motion to Certify Subclasses, Admin Motion to Continue Trial and Pre-Trial Dates, Motion for Reconsideration of Depo Disc Order, and Opp to Motion for Clarification or Modification of Class Def.	0.2	
5/14/2024	BBK	Meeting w/ co-counsel re Reply ISO Motion to Certify Subclasses, Admin Motion to Continue Trial and Pre-Trial Dates, Motion for Reconsideration of Depo Disc Order, and Opp to Motion for Clarification or Modification of Class Def.	1.2	
5/14/2024	BBK	Drafting RBGG-specific task list for upcoming filings.	0.3	
5/14/2024	BBK	Meeting w/ JSY and AHS re plan for upcoming filings and debrief from co-counsel meeting.	0.7	
5/14/2024	BBK	Drafting/sending post-meeting email to co-counsel re planned next steps for upcoming filings.	0.2	
5/14/2024	BBK	Reviewing/responding to M. Johnson email re potential EOT to file Reply ISO Motion for Certification of Subclasses; conferring w/ JSY re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/14/2024	BBK	Emails w/ co-counsel and JSY re motion for reconsideration of Disc Order re depos of Rubin and Omole and sealing motion for same.	0.1	
5/14/2024	AHS	Called and left messages for Dr. Barchuk and emailed GCG and JY update.	0.4	
5/14/2024	AHS	Read Defs' motion for clarification of class list.	0.9	
5/14/2024	AHS	Read defendants response in opposition to plfs' mot for subclass certification.	0.8	
5/14/2024	AHS	Call with GCG to discuss Dr. Barchuk report.	0.1	
5/14/2024	AHS	Emailed KS and Dr. Barchuk re: materials for report.	0.2	
5/14/2024	AHS	Read article sent to us by Dr. Barchuk re: patient care transfer techniques.	0.4	
5/14/2024	AHS	Updated Exhibit C in Barchuk report.	0.2	
5/14/2024	AHS	Pulled up and reviewed relevant materials before call with Dr. Barchuk //.	0.2	
5/14/2024	AHS	Call with Dr. Barchuk GCG and KS.	0.7	
5/14/2024	AHS	Sent GCG materials needed for follow up tasks after meeting with Dr. Barchuk.	0.1	
5/14/2024	AHS	Prepped for co-counsel meeting by reviewing internal case tasks to-do list.	0.1	
5/14/2024	AHS	Meeting with co-counsel to discuss defs' opposition to subclass motion, defs' mot for clarification, and upcoming deadlines.	1.1	
5/14/2024	AHS	Proofread final Barchuk expert report materials.	0.5	
5/14/2024	AHS	Review RBGG assignments coming out of co-counsel meeting.	0.3	
5/14/2024	AHS	Met with JY and BBK to discuss drafting assignments for reply brief and response to defs' motion for clarification.	0.8	
5/14/2024	KES	Download and organize opposition papers filed under seal and download, organize and review related expert declaration backup files.	1.3	
5/14/2024	KES	Emails re motion re additional depos.	0.2	
5/14/2024	KES	Participate in Zoom meeting with expert Barchuk.	0.5	
5/14/2024	KES	Download additional articles for Barchuk report and confer AHS re same.	0.2	
5/14/2024	KES	Brief review of draft Barchuk report and double-check selected testimony history.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/14/2024	KES	Participate in Zoom with co-counsel re expert reports, depos.	0.7	
5/14/2024	KES	Emails with L. Castro re Defs sealed opposition papers.	0.2	
5/14/2024	DLE	Attend and note take check-in with co-counsel.	1.2	
5/14/2024	DLE	Organize and circulate notes from co-counsel check-in.	0.4	
5/14/2024	DLE	Save and circulate recently filed pleadings and exhibits.	1.7	
5/15/2024	JSY	Conf. w/ GCG re extension request.	0.1	
5/15/2024	JSY	Messages re expert reports.	0.2	
5/15/2024	JSY	Emails re extension request for Reply.	0.1	
5/15/2024	JSY	Prepare sealing pleadings for motion for reconsideration; multiple emails re same.	0.5	
5/15/2024	JSY	Further emails re expert reports.	0.1	
5/15/2024	BBK	Conferring w/ JSY and AHS re plan for Reply ISO Motion to Certify Subclasses and Pls' motion for reconsideration of depo order re: Rubin and Omole depos.	0.2	
5/15/2024	BBK	Reviewing M. Johnson - E. Rutner emails re Ds' requests to meet and confer further on disc and dispositive motions; conferring w/ JSY/AHS re same.	0.1	
5/15/2024	BBK	Emailing w/ co-counsel and JSY re motion for reconsideration of depo order and sealing motion re same.	0.1	
5/15/2024	BBK	Reviewing/responding to G. Wallace emails re arguments fr Opp to Motion for Clarification of Class Def.	0.1	
5/15/2024	BBK	Conferring w/ co-counsel and RBGG team re finalizing/serving Barchuk and Cross Expert Reports.	0.2	
5/15/2024	AHS	Researched local rules re motions for reconsideration and discussed with JY and BBK.	0.2	
5/15/2024	AHS	Discussed case status and upcoming deadlines with DLE.	0.2	
5/15/2024	AHS	(Billing Judgment) Conf. with KS to discuss serving Barchuk expert report and associated materials on Defs.	0.0	1.0
5/15/2024	AHS	Reviewed emails from co-counsel re: response to motion for clarification and M&C on 5/16.	0.3	
5/15/2024	AHS	Emailed cocounsel and talked to KS re timing for serving Barchuk report.	0.2	
5/15/2024	KES	Serve Barchuk expert report and confer AHS re same; brief review of final re same; upload articles to Sharefile re same.	0.9	
5/15/2024	KES	Review team emails re status of expert reports.	0.2	
5/15/2024	KES	Review team emails re status of motion re depos and sealing.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/15/2024	DLE	Check-in with AHS to discuss case tasks and issues.	0.2	
5/16/2024	GCG	Confs w/ JSY re plan for reply briefing.	0.2	
5/16/2024	GCG	Emails to MJ and team re request for extension of case schedule.	0.1	
5/16/2024	JSY	Emails re expert reports and meet and confer with Defs.	0.2	
5/16/2024	JSY	Conf. w/ BBK re motion to clarify, Reply, meet and confer with Defs, and expert reports.	0.4	
5/16/2024	JSY	LM for JA.	0.1	
5/16/2024	JSY	Multiple conf. w/ KES and GCG re case tasks and depo summaries.	0.7	
5/16/2024	JSY	Emails re issue tags for depo coding.	0.2	
5/16/2024	JSY	Emails re motion to modify case schedule; review same.	0.2	
5/16/2024	JSY	Emails re insert for Reply re stipulation re typicality of rooms inspected.	0.2	
5/16/2024	BBK	Emailing w/ G. Wallace re relevant case law and legal args IRT Ds' Opp to Motion to Certify Subclasses.	0.3	
5/16/2024	BBK	Emailing w/ RBGG team and co-counsel to confirm Ds did not disclose any transportation experts on 5/15.	0.1	
5/16/2024	BBK	Reviewing T. Close summary of meet and confer w/ Ds re case schedule, dispositive motions, and discovery disputes and post-M&C emails between G. Wallace - E. Rutner.	0.1	
5/16/2024	BBK	Conferring w/ JSY re case schedule, discovery disputes, dispositive motions and class cert briefing.	0.2	
5/16/2024	BBK	Reviewing/commenting on draft PRA requests to fire/police depts w/ six BD facilities in their jurisdictions and responding to AHS and DE questions re same.	0.5	
5/16/2024	BBK	Emails w/ RBGG team re coding deposition transcripts for dispositive motions and trial; emails w/ JSY and AHS re draft insert for Reply ISO Motion to Certify Subclasses re: Inspections Stip & Order.	0.1	
5/16/2024	BBK	Reviewing/commenting on M. Johnson draft admin motion to modify case schedule and supporting decl; conferring w/ JSY re same.	0.2	
5/16/2024	AHS	Edited and revised draft PRA requests.	0.7	
5/16/2024	AHS	Read co-counsel's summary of M&C with defendants.	0.2	
5/16/2024	AHS	Researched and drafted section of class cert reply on stipulation and order re: units inspected.	2.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/16/2024	AHS	Reread section III of Defs' opposition to class cert to prep for drafting response to Section III.B.	0.4	
5/16/2024	AHS	Revised draft section of class cert reply on stipulation and order re inspections.	1.7	
5/16/2024	KES	Follow up re Rule 26 reports.	0.2	
5/16/2024	KES	Calendar hearing deadlines.	0.2	
5/16/2024	KES	Emails re PRA requests and check status of prior requests.	0.2	
5/16/2024	KES	Review TextMap for status of depo coding and confer JY re same.	0.6	
5/17/2024	GCG	Continued analysis of defendants' opposition to class cert.	0.2	
5/17/2024	GCG	Meet w/ co-counseling team re same and re ongoing fact and expert discovery.	1.3	
5/17/2024	GCG	Conf w/ JSY re insert to plaintiffs' reply.	0.2	
5/17/2024	GCG	Review emails from JB and ER re extension requests.	0.1	
5/17/2024	GCG	Email to AB re report and potential deposition.	0.1	
5/17/2024	JSY	Conf. w/ GCG re extension requests.	0.1	
5/17/2024	JSY	Team meeting.	1.4	
5/17/2024	JSY	Conf. and emails re tasks for Reply.	0.2	
5/17/2024	JSY	Edit section of Reply re 2019 stipulation; multiple emails and conf. re same.	1.9	
5/17/2024	BBK	Reviewing draft Stip for 1-wk extension to file Reply ISO Cert motion and emails w/ opposing counsel re same.	0.1	
5/17/2024	BBK	Reviewing Law360 article re recent 9th Cir and ND Cal cases re challenges to Pls' damages experts in putative (b)(3) class actions and sharing w/ team.	0.2	
5/17/2024	BBK	Conferring w/ AHS re insert for Reply ISO Class Cert Motion responding to Ds' argument on (b)(2) classes seeking incidental damages.	0.2	
5/17/2024	BBK	Reviewing/responding to B. Umpierre request for analysis of impacts of understaffing on individual Pls for Flores Rebuttal Report.	0.2	
5/17/2024	BBK	Reviewing emails w/ opposing counsel re proposed alternative Exec Dir custodians for ESI re Fleet Safety Policy, page limits for dispositive motions, and Flores's availability for deposition.	0.2	
5/17/2024	BBK	Meeting w/ co-counsel re Reply ISO Class Cert Motion and discovery disputes.	1.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 916

SERVICES

Date	Person	Description of Services	Hours	Discount
5/17/2024	BBK	Meeting w/ AHS re researching/drafting inserts for Reply ISO Class Cert Motion.	0.2	
5/17/2024	BBK	Meeting w/ JSY re revising Stip & Order on Inspections for Reply ISO Class Cert Motion.	0.2	
5/17/2024	BBK	Conferring w/ DE re revising PRA Requests to fire/police dep'ts re: 911 calls from BD facilities where named Pls' live(d).	0.1	
5/17/2024	BBK	Researching re: studies on prevalence of mobility and vision disabilities among elderly persons in US; reporting on same to team.	0.5	
5/17/2024	BBK	Reviewing Ds' response to Pls' request to continue trial and pre-trial deadlines; reviewing Court order granting 1 week EOT for reply Brief.	0.2	
5/17/2024	BBK	Reviewing/commenting on Reply insert re Stip & Order re Inspections; conferring w/ JSY and AHS re same.	0.3	
5/17/2024	AHS	Drafted section of class cert reply on (b)(2) incidental damages.	3.4	
5/17/2024	AHS	Talked to BBK re: draft insert re: (b)(2) class and damages.	0.4	
5/17/2024	AHS	Weekly meeting with co-counsel to discuss upcoming reply iso class cert motion and expert discovery.	1.5	
5/17/2024	AHS	Discussed PRA requests with DLE.	0.2	
5/17/2024	AHS	Updated internal list of upcoming deadlines and ongoing projects.	0.2	
5/17/2024	KES	Zoom meeting with co-counsel re class cert reply.	1.5	
5/17/2024	KES	Check prior PRA productions and confer DE re new PRA requests.	0.6	
5/17/2024	KES	Download and circulate order and calendar new deadlines.	0.2	
5/17/2024	DLE	Save and circulate filed pleading.	0.4	
5/17/2024	DLE	Work on implementing BBK and AHS's edits to PRA request letters.	1.5	
5/17/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.4	
5/17/2024	DLE	Finalize and circulate notes from weekly team meeting.	0.3	
5/18/2024	GCG	Review MJ emails re Cross report and Flores deposition.	0.1	
5/18/2024	GCG	Email to GW and team re prevalence of wheeled mobility devices among the elderly.	0.1	
5/19/2024	JSY	Texts with JA re status.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/20/2024	GCG	Conf w/ and emails to JSY re plan for reply in support of class cert and status of named plaintiff.	0.2	
5/20/2024	JSY	Emails re inserts for Reply brief.	0.3	
5/20/2024	JSY	Emails and conf. re case schedule.	0.1	
5/20/2024	JSY	Emails re letter to clients.	0.1	
5/20/2024	BBK	Emailing w/ co-counsel re statistics on prevalence of disability by type and age for numerosity arguments.	0.1	
5/20/2024	BBK	Reviewing emails w/ opposing counsel re dispositive motion page limits, expert depositions, EOT to serve responses to interrogatories, and impasse w/r/t depositions of K. Rubin and A. Omole.	0.1	
5/20/2024	BBK	Reviewing/revising AHS draft insert for Reply ISO Class Cert Motion.	1.3	
5/20/2024	BBK	Emailing w/ JSY and AHS re revisions to insert for Reply ISO Class Cert Motion re: Stip & Order on Inspections.	0.2	
5/20/2024	BBK	Emailing w/ co-counsel re outline for Reply Brief and tasks for RBGG; reviewing outline.	0.2	
5/20/2024	BBK	Conferring w/ AHS re finalizing/serving PRA requests to fire and police dep'ts.	0.1	
5/20/2024	BBK	Reviewing Court Order continuing trial and pre-trial dates; conferring w/ team re same.	0.2	
5/20/2024	BBK	Emailing w/ JSY and GCG re updating clients and experts re trial continuance.	0.1	
5/20/2024	BBK	Conferring w/ RBGG team re responding to intake from daughter of BD resident.	0.1	
5/20/2024	BBK	Emailing w/ JSY and AHS re meeting on 5/21 re: briefing on Opp to Motion for Clarification and Reply ISO Class Cert Motion.	0.1	
5/20/2024	BBK	Researching/drafting Opp to Motion for Clarification re Class Definition.	2.3	
5/20/2024	AHS	Researched stipulations for section of reply brief.	2.4	
5/20/2024	AHS	Emails re updated draft section of reply brief.	0.2	
5/20/2024	AHS	Emailed with RBGG attorneys re: new case schedule and intake from family member of Brookdale resident.	0.3	
5/20/2024	AHS	Followed up with intake from family member of Brookdale resident.	0.2	
5/20/2024	AHS	Reviewed PRA requests and emailed DLE.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/20/2024	AHS	Finalized section of reply on 12(b)(2) class's and damages claims and sent to co-counsel.	0.6	
5/20/2024	KES	Review J. Gilliam pre-trial standing order and calendar deadlines.	0.7	
5/20/2024	KES	Review scheduling order and calendar new deadlines.	0.6	
5/20/2024	DLE	Compile images from expert reports re 3 Rule 26 barriers for Fountaingrove facility.	1.1	
5/21/2024	GCG	Conf w/ JSY re reply to class cert.	0.1	
5/21/2024	GCG	Review and revise letter to named plaintiffs re case schedule.	0.1	
5/21/2024	GCG	Email to Dr. Barchuk assistant re case schedule to plan deposition and trial.	0.1	
5/21/2024	JSY	Conf. w/ GCG re projects for Reply.	0.1	
5/21/2024	JSY	Meeting w/ BBK and AHS re projects for Reply.	0.6	
5/21/2024	JSY	Emails re potential witness.	0.1	
5/21/2024	JSY	Research and draft insert for reply re delegation to EDs.	5.3	
5/21/2024	JSY	Emails re letter to clients; review and edit same.	0.1	
5/21/2024	JSY	Emails re documents withheld.	0.1	
5/21/2024	JSY	Draft and edit sealing pleadings for motion to reconsider; emails re same.	1.0	
5/21/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions and Ds' failure to produce unredacted versions of docs filed ISO Opp to Class Cert Motion.	0.1	
5/21/2024	BBK	Meeting w/ JSY and AHS re briefing for Reply ISO Cert Motion and Opp to Motion for Clarification.	0.5	
5/21/2024	BBK	Reviewing AHS report re intake call w/ daughter of putative class member and JSY emails re same.	0.1	
5/21/2024	BBK	Conferring w/ AHS and JSY re draft letter to clients re trial continuance and hearing on cert motion; reviewing and proposing revisions to same.	0.2	
5/21/2024	BBK	Conferring w/ KES re analysis of deposition transcripts and other case tasks.	0.2	
5/21/2024	BBK	Emails w/ co-counsel and JSY re finalizing/filing motion for reconsideration of Discovery Order re depositions of Rubin and Omole and sealing pleadings for same.	0.1	
5/21/2024	BBK	Researching/drafting Opposition to Motion for Clarification of Class Definition.	6.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/21/2024	BBK	Emailing w/ JSY and AHS re inserts for Reply ISO Class Cert Motion.	0.1	
5/21/2024	AHS	Call with JY and BBK to discuss drafts of subclass reply and response to defs' mot to clarify/amend class definition.	0.5	
5/21/2024	AHS	Call with rep. of putative class member.	0.5	
5/21/2024	AHS	Emailed team summary of call.	0.4	
5/21/2024	AHS	Emails re same.	0.4	
5/21/2024	AHS	Emailed with DLE re: PRA requests.	0.1	
5/21/2024	AHS	Prepared letter to named plaintiffs updating them about new case schedule.	0.7	
5/21/2024	AHS	Drafted outline for section of reply brief on landlord/tenant liability and sent it to BBK and JY.	1.1	
5/21/2024	KES	Check status of depo video files and download and organize file set of videos for 2024 depos.	2.0	
5/21/2024	DLE	Finalize and send PRA requests to 12 police and fire departments in named facility jurisdictions; organize follow-up re responses, and confer with reception re routing calls from departments.	1.6	
5/22/2024	JSY	Multiple emails and conf. re sealing pleadings for motion for reconsideration.	0.5	
5/22/2024	JSY	Emails re landlord issue for Reply.	0.2	
5/22/2024	JSY	Edit draft insert re EDs.	0.2	
5/22/2024	JSY	Review and edit Opp to motion for clarification re class list; emails re same.	0.8	
5/22/2024	JSY	Emails re inserts for reply.	0.2	
5/22/2024	BBK	Emailing w/ JSY and co-counsel re preparing/filing motion for reconsideration of discovery order denying depositions and sealing motion for same.	0.2	
5/22/2024	BBK	Reviewing final motion for reconsideration.	0.2	
5/22/2024	BBK	Reviewing/sending proposed revisions to final draft letter to clients re case schedule; conferring w/ team re same.	0.2	
5/22/2024	BBK	Drafting opposition to motion for clarification/modification of class definition.	1.5	
5/22/2024	BBK	Emailing w/ JSY/AHS re strategy for research/drafting of insert for Class Cert Reply addressing Ds' arguments relating to landlords.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/22/2024	BBK	Reviewing/commenting/proposing revisions to JSY draft insert for Class Cert Reply re Ds' arguments re: EDs as independent actors.	0.6	
5/22/2024	BBK	Emailing w/ co-counsel re Class Cert Reply Brief; conferring w/ AHS/JSY re same.	0.2	
5/22/2024	BBK	Reviewing JSY comments/proposed changes to Opp to Motion for Clarification/Modification of Class Definition and revising accordingly.	1.9	
5/22/2024	BBK	Emailing w/ co-counsel re comments/proposed additions/revisions to Opp to Motion for Clarification/Modification of Class Definition; conferring w/ JSY/AHS re same.	0.4	
5/22/2024	BBK	Drafting further revisions to Opp to Motion for Clarification IRT co-counsel comments.	0.3	
5/22/2024	AHS	Reviewed emails with co-counsel re: discovery and mot to reconsider.	0.3	
5/22/2024	AHS	Finalized letters to named plaintiffs and circulated to team and co-counsel.	1.0	
5/22/2024	AHS	Emailed with JY and BBK re: landlord section of reply brief.	0.4	
5/22/2024	AHS	Reviewed emails with co-counsel re: response to defs' mot to clarify/amend class definition.	0.3	
5/22/2024	KES	Download and organize pleadings.	0.3	
5/22/2024	KES	Confer JY re motion for reconsideration.	0.1	
5/23/2024	GCG	Email w/ RBGG team re expert deposition.	0.1	
5/23/2024	GCG	Email w/ BBK, MJ and team re opposition to motion to clarify.	0.1	
5/23/2024	JSY	Emails re Opp to motion to reconsider.	0.1	
5/23/2024	BBK	Emailing w/ AHS and JSY re finalizing/sending letters to named Pls' re case schedule and continued class cert hearing.	0.2	
5/23/2024	BBK	Emails w/ GCG re scheduling expert depositions and w/ AHS re text from B. Jestrabek-Hart re BD Scotts Valley.	0.1	
5/23/2024	BBK	Emails w/ co-counsel re: opposition to motion for clarification re class definition.	0.1	
5/23/2024	BBK	Conferring re: opposition to motion for clarification re class definition and supporting pleadings.	0.3	
5/23/2024	BBK	Drafting BBK Decl ISO opposition to motion for clarification re class definition (including factual research for same).	0.9	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/23/2024	BBK	Conferring w/ MJT re edits to opposition to motion for clarification re class definition.	0.2	
5/23/2024	BBK	Revising opposition to motion for clarification re class definition (including to incorporate comments by R. Steyer, M. Johnson and T. Close).	1.8	
5/23/2024	BBK	Emailing w/ RBGG team and co-counsel re Opp to Motion for Clarification re class definition.	0.2	
5/23/2024	BBK	Reviewing Senior Housing News article re: BD's implementation of its HealthPlus strategy.	0.1	
5/23/2024	BBK	Reviewing M. Johnson - E. Rutner emails re Ds' refusal to redact portions of lease agreements relied upon by Ds in Opp to Class Cert Motion; conferring w/ JSY and AHS re same.	0.2	
5/23/2024	BBK	Reviewing M. Johnson email memo to team analyzing provisions of lease agreements relating to ADA compliance.	0.1	
5/23/2024	AHS	Corresponded with named plaintiff and sent update to team.	0.4	
5/23/2024	AHS	Finalize letters to named plfs , and coordinated with support staff to mail them out.	0.5	
5/23/2024	AHS	Phone calls with two city clerks re: PRA requests.	0.2	
5/23/2024	AHS	Emailed Darcy re: PRA requests.	0.1	
5/23/2024	AHS	Researched landlord liability under the ADA for reply brief.	0.3	
5/23/2024	AHS	Reviewed DLE's updated PRA request to Scotts Valley Fire District.	0.1	
5/23/2024	AHS	Emailed letters to named plfs.	0.3	
5/23/2024	AHS	Reviewed emails with Defs re: redactions in lease agreements, and email from co-counsel re: facts revealed from produced portions of agreements.	0.3	
5/23/2024	MJT	(Billing Judgment) Edit section of motion for clarification.	0.0	1.8
5/23/2024	DLE	Draft new version of PRA request letter, finalize, and send.	0.8	
5/24/2024	GCG	Email w/ BJH re court hearing.	0.1	
5/24/2024	GCG	Conf w/ JSY re opposition and reply briefing.	0.2	
5/24/2024	JSY	Team meeting.	0.9	
5/24/2024	JSY	Conf. w/ AS and GCG re Reply brief projects and status.	0.5	
5/24/2024	BBK	Reviewing emails from opposing counsel serving court-ordered ROG responses and privilege log re: redactions to lease agreements.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/24/2024	AHS	Emailed with DLE about access to Santa Rosa PRA request responses.	0.2	
5/24/2024	AHS	Discussed upcoming briefing including new case schedule and expert depos with DLE.	0.5	
5/24/2024	AHS	Researched landlord liability issues for class cert reply brief.	2.1	
5/24/2024	AHS	Weekly co-counsel meeting to discuss reply iso subclass cert motion.	0.9	
5/24/2024	AHS	Conf. w/ JY re: landlord section of subclass cert reply.	0.6	
5/24/2024	KES	Zoom meeting with co-counsel re reply.	0.9	
5/24/2024	KES	Research re disability stats.	0.3	
5/24/2024	DLE	Meeting with AHS to discuss case issues and assignments.	0.5	
5/24/2024	DLE	Attend and note-take weekly co-counsel meeting.	0.9	
5/24/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.3	
5/25/2024	GCG	Research and draft email to GW and team re mobility and vision disability prevalence.	0.1	
5/26/2024	JSY	Emails re reply brief.	0.1	
5/26/2024	AHS	Finished first draft of section of reply brief on tenant liability under ADA section III.	4.1	
5/27/2024	GCG	Review emails from AS and team re reply pleadings due 06/04.	0.1	
5/27/2024	JSY	Review insert for reply; emails re same.	0.2	
5/28/2024	JSY	Conf. w/ GCG re Reply filing.	0.1	
5/28/2024	JSY	Review and edit excerpt re landlord tenant liability; emails re same.	1.0	
5/28/2024	JSY	Emails re ROG responses.	0.1	
5/28/2024	JSY	Conf. w/ AHS re Opp to Admin motion to enlarge page limits.	0.1	
5/28/2024	JSY	Emails re admin mtn to enlarge page limits.	0.2	
5/28/2024	BBK	Reviewing emails w/ opposing counsel re Ds' responses to Interrogatories re: access barriers; internal comm'ns w/ co-counsel re same.	0.2	
5/28/2024	BBK	Conferring w/ DE/KES/WP re finalizing/filing Opp to Motion for Clarification and supporting pleadings and exhibits.	0.6	
5/28/2024	BBK	Proof-reading/fact-checking/finalizing BBK Decl ISO Opposition to Motion for Clarification.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/28/2024	BBK	Proof-reading/fact-checking/finalizing Opposition to Motion for Clarification.	1.9	
5/28/2024	BBK	Reviewing AHS draft insert for Reply re tenant liability under ADA and commenting on proposed additions to same; reviewing AHS further revisions to same and JSY comments.	0.4	
5/28/2024	BBK	Reviewing DE notes from 5/24 co-counsel meeting on Reply ISO Class Cert Motion.	0.2	
5/28/2024	BBK	Reviewing census data on prevalence of mobility disability by age identified by KES.	0.1	
5/28/2024	BBK	Reviewing/commenting on AHS updated case task list.	0.1	
5/28/2024	BBK	Reviewing/analyzing Ds' Admin Motion seeking leave to file 50 pages for dispositive motion; calculating deadline to oppose same.	0.2	
5/28/2024	BBK	Conferring w/ team re opposing Admin Motion for additional page numbers for dispositive motion.	0.2	
5/28/2024	AHS	Reviewed emails with co-counsel and opposing counsel re: discovery disputes.	0.4	
5/28/2024	AHS	Emailed team re: landlord/tenant liability section of reply brief.	0.1	
5/28/2024	AHS	Communicated with named plf Bernie Jestrabek-Hart and team re: new ED at Scotts Valley.	0.8	
5/28/2024	AHS	Emailed with DLE re PRA request responses.	0.2	
5/28/2024	AHS	Revised section of subclass cert reply brief based on comments from JY and BBK.	1.7	
5/28/2024	AHS	Read our opp to mot to amend/clarify class definition.	0.2	
5/28/2024	AHS	Draft memo re: Rule 19 and joinder.	0.1	
5/28/2024	AHS	Updated internal case tasks list.	0.8	
5/28/2024	AHS	Read Defs' admin motion for more pages for summary judgment motion.	0.2	
5/28/2024	AHS	Talked to JY re plan for response to defs' admin motion for more SJ pages.	0.1	
5/28/2024	KES	Review, finalize and efile opposition to motion for clarification.	0.5	
5/28/2024	KES	Review files for information related to facility EDs.	0.4	
5/28/2024	KES	Review email re Defs summary judgment.	0.1	
5/28/2024	KES	Confer team re reply.	0.1	
5/28/2024	DLE	Prepare exhibits for opposition to motion for clarification; finalize same to prepare for filing.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/28/2024	DLE	Download and circulate filed pleadings.	0.5	
5/28/2024	DLE	Confer with AHS re PRA request responses.	0.2	
5/29/2024	GCG	Conf w/ GW re reply pleadings.	0.2	
5/29/2024	GCG	Follow up summary re same.	0.1	
5/29/2024	GCG	Conf w/ and emails to JSY re same.	0.2	
5/29/2024	GCG	Emails to BBK and team re initial review of reply brief and exhibits needed for Wallace reply declaration.	0.2	
5/29/2024	JSY	LM for JA.	0.1	
5/29/2024	JSY	Emails re sealing pleadings.	0.1	
5/29/2024	JSY	Multiple conf., emails, and messages re sections for Reply brief and filing.	0.9	
5/29/2024	JSY	Edit reply brief; multiple emails and conf. re same and re supporting documents for Reply.	1.6	
5/29/2024	BBK	Further emails w/ opposing counsel re inadequate court-ordered ROG responses re access barriers.	0.1	
5/29/2024	BBK	Reviewing emails w/ opposing counsel re: Ds' objections to M. Johnson - T. Close - J. Kailes visiting S. Stiner at BD San Ramon; conferring w/ AHS/JSY re same.	0.2	
5/29/2024	BBK	Emailing w/ G. Wallace / M. Johnson / JSY / AHS re draft inserts for Reply ISO Class Cert Motion.	0.3	
5/29/2024	BBK	Conferring w/ JSY and AHS re additional insert for Reply requested by G. Wallace re: BD's operation/control of facilities.	0.7	
5/29/2024	BBK	Analyzing CapEx related docs identified by R. Steyer for Reply ISO Class Cert and emailing w/ her re same.	0.6	
5/29/2024	BBK	Drafting Reply Insert re Ds' operation of its facilities and control over capital improvements (including factual research for same); reviewing/incorporating JSY edits to same.	2.6	
5/29/2024	BBK	Emailing w/ co-counsel and RBGG team re identifying exhibits for Wallace Reply Decl and docs to be filed under seal w/ Reply ISO Cert Motion.	0.2	
5/29/2024	BBK	Emailing w/ RBGG team re: Ds' filing re sealing of docs submitted w/ Pls' Motion for Reconsideration.	0.1	
5/29/2024	BBK	Emailing w/ RBGG team re: plan for filing of Reply ISO Cert Motion.	0.2	
5/29/2024	BBK	Conferring w/ JSY re plan for analyzing/commenting on Reply brief.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/29/2024	BBK	Reviewing/forwarding to team comm'ns w/ MJ Beeler's chambers re: failure to provide courtesy copies for sealing motion filed ISO motion for reconsideration.	0.1	
5/29/2024	BBK	Conferring w/ JSY and AHS re plan for opposition to admin motion seeking 50 pages for dispositive motion.	0.1	
5/29/2024	BBK	Reviewing/analyzing/commenting on draft Reply brief.	2.7	
5/29/2024	AHS	Discussed defendants' admissions re: authority to direct capital expenditures with JY and BBK and reviewed prior team correspondence on the topic.	0.5	
5/29/2024	AHS	Call with JY and BBK re: defs' admissions about CapEx authority.	0.2	
5/29/2024	AHS	Reviewed emails between co-counsel and opposing counsel re SR visit.	0.3	
5/29/2024	AHS	Reviewed emails with co-counsel and first full draft of subclass reply brief.	0.4	
5/29/2024	AHS	Drafted opp to Defs' admin motion for more pages for SJ motion.	2.1	
5/29/2024	FGL	Review JSY email and confer with JSY re assistance with efiling, email to JSY re same.	0.1	
5/29/2024	FGL	Confer with DLE re status of filing of Reply.	0.1	
5/29/2024	FGL	Review KES email re proof of service and under seal documents.	0.1	
5/29/2024	FGL	Review detailed email from KES re filing under seal documents and further confer with KES re same.	0.2	
5/29/2024	KES	Create POS and email to team re same.	0.4	
5/29/2024	KES	Emails with FGL re reply filing and process for filing under seal in ND.	0.4	
5/29/2024	KES	Download and circulate Defs decl and documents ISO sealing.	0.3	
5/29/2024	KES	Confer JY and DE re gathering, identifying and preparing exhibits for Wallace Reply Decl and email DE with relevance docs re same; review files re same.	0.8	
5/29/2024	KES	Review draft reply brief and begin indentifying documents for Wallace Decl.	1.0	
5/29/2024	DLE	Discuss task for noting citations that need exhibits in Wallace declaration of reply brief with KES; partial discussion of task with JSY.	0.8	
5/30/2024	GCG	Conf w/ and emails to JSY re revisions to reply brief and plan for reply filing.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/30/2024	JSY	Emails re reply brief and declaration; edit same.	1.2	
5/30/2024	JSY	Edit Opp to Admin Mtn to extend page limits; conf. w/ AS re same; emails re same.	0.9	
5/30/2024	JSY	Team meeting re reply.	0.7	
5/30/2024	JSY	Edit docs re reply and conf. re same.	1.0	
5/30/2024	JSY	Multiple emails and messages re Opp to Admin motion.	0.2	
5/30/2024	JSY	Edit GBW declaration; multiple emails re same.	1.1	
5/30/2024	BBK	Emailing w/ team re meeting on finalizing Reply brief.	0.1	
5/30/2024	BBK	Analyzing/sharing w/ RBGG team and co-counsel ND Cal class cert opinion issued on 5/28 relevant for Reply.	0.2	
5/30/2024	BBK	Reviewing JSY comments on draft Reply ISO Cert Motion.	0.3	
5/30/2024	BBK	Emails w/ R. Steyer, G. Wallace, and JSY re identifying evidence of corporate control over physical alterations to facilities and re: residents moving units at Brookdale ISO Reply Brief; reviewing/commenting on docs located and conferring w/ JSY re same.	0.9	
5/30/2024	BBK	Reviewing/responding to G. Wallace initial responses to JSY/BBK comments on draft Reply Brief; conferring w/ JSY re same.	0.2	
5/30/2024	BBK	Emailing w/ team re preparing Wallace Reply Decl.	0.1	
5/30/2024	BBK	Reviewing Clerk's Notice re chambers copies and standing order re discovery procedures.	0.1	
5/30/2024	BBK	Conferring w/ JSY re AHS draft opp to admin motion seeking enlargement of page limits for summary judgment motion.	0.2	
5/30/2024	BBK	Reviewing/commenting on JSY revisions to AHS draft opp to admin motion seeking enlargement of page limits for summary judgment motion.	0.2	
5/30/2024	BBK	Conferring w/ AHS re exhibits for AHS Decl ISO opp to admin motion seeking enlargement of page limits for summary judgment motion.	0.1	
5/30/2024	BBK	Conferring w/ AHS and JSY re further revisions to opp to admin motion seeking enlargement of page limits for summary judgment motion.	0.1	
5/30/2024	BBK	Revising AHS updated opp to admin motion seeking enlargement of page limits for summary judgment motion; emailing JSY/AHS re same.	1.0	
5/30/2024	BBK	Meeting w/ co-counsel re Reply.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/30/2024	BBK	Reviewing Westminster PD PRA response re 911 calls from Brookhurst during JA's residency; emailing team re same.	0.2	
5/30/2024	BBK	Reviewing initial draft Waters Reply Decl.	0.2	
5/30/2024	AHS	Met with JY to discuss response to defs' admin mot and plan for filing subclass cert reply.	0.2	
5/30/2024	AHS	Reviewed emails with cocounsel re: reply brief.	0.3	
5/30/2024	AHS	Incorporated JY edits to opp to admin motion and circulated.	2.5	
5/30/2024	AHS	Emailed with counties and DLE re PRA requests and responses.	0.3	
5/30/2024	AHS	Meeting with co-counsel to discuss subclass cert reply.	0.8	
5/30/2024	AHS	Emailed named plaintiff and co-counsel to set up call.	0.2	
5/30/2024	AHS	Made additional edits to waiver argument in response to defs' admin motion and sent to co-counsel.	0.5	
5/30/2024	DLE	Begin identifying, locating, and saving down documents as exhibits for reply declaration.	0.7	
5/30/2024	DLE	Attend and note-take co-counsel team check-in.	0.8	
5/30/2024	DLE	Organize and circulate notes from co-counsel check-in meeting.	0.4	
5/30/2024	DLE	Draft, finalize, and send updated PRA request letter to fire department.	0.6	
5/30/2024	DLE	Confer with AHS re PRA request responses we have received so far; update tracking chart re same.	0.5	
5/30/2024	DLE	Confer with JSY re Wallace Reply Decl exhibits.	0.1	
5/30/2024	DLE	Save and circulate filed pleading.	0.2	
5/31/2024	GCG	Review and analyze sanctions motion.	0.3	
5/31/2024	GCG	Conf w/ JSY re same.	0.2	
5/31/2024	JSY	Team meeting re Reply, including RBGG team meeting.	1.2	
5/31/2024	JSY	Conf. w/ LAE and GCG re sanctions motion.	0.4	
5/31/2024	JSY	Emails re motion for sanctions; review same.	0.4	
5/31/2024	JSY	Draft documents re Reply brief; edit same; emails re same.	1.5	
5/31/2024	JSY	Emails re BJH declaration.	0.2	
5/31/2024	MWB	Emails re: defendants' sanctions motion.	0.2	
5/31/2024	SJR	Emails re status.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/31/2024	BBK	Reviewing co-counsel's proposed revisions to Opp to Admin Motion re MSJ Page Limits; conferring w/ SJY and AHS re same.	0.1	
5/31/2024	BBK	Reviewing/proposing revisions to AHS draft Decl ISO Opp to Admin Motion re MSJ Page Limits; emailing w/ team re finalizing/filing same.	0.2	
5/31/2024	BBK	Emails w/ R. Steyer, JSY and G. Wallace re locating exhibits for Wallace Reply Decl; analyzing same.	0.7	
5/31/2024	BBK	Phone call w/ JSY re Ds' motion for sanctions.	0.2	
5/31/2024	BBK	Reviewing Ds' motion for sanctions.	0.3	
5/31/2024	BBK	Meeting w/ co-counsel re finalizing/filing Reply ISO class cert and supporting pleadings; follow-up debrief meeting w/ RBGG team re same.	1.0	
5/31/2024	BBK	Emails w/ RBGG team re logistics/plan for finalizing/filing Reply ISO Class Cert.	0.3	
5/31/2024	BBK	Emails w/ team re: sealing motion and redactions for Flores Rebuttal Report.	0.2	
5/31/2024	BBK	Conferring w/ JSY/AHS re preparing Supp BJH decl ISO Reply; emails w/ co-counsel re same.	0.3	
5/31/2024	BBK	Revising updated draft Reply brief.	2.1	
5/31/2024	BBK	Emailing G. Wallace and team re BBK proposed cuts and revisions to Reply brief.	0.1	
5/31/2024	BBK	Reviewing MJ Beeler's order re further briefing on Pls' motion for reconsideration of order re: depositions.	0.1	
5/31/2024	AHS	Reviewed emails with co-counsel re reply draft.	0.4	
5/31/2024	AHS	Drafted declaration to file with response to defs' admin mot to enlarge page limit.	0.6	
5/31/2024	AHS	Reviewed defs' mot for sanctions.	0.2	
5/31/2024	AHS	Meeting with co-counsel and JY BBK DLE to discuss subclass cert reply brief and other filings.	1.1	
5/31/2024	AHS	Finalized response in opp to defs' admin mot to enlarge pages.	0.3	
5/31/2024	AHS	Prepared declaration for Bernie Jestrabek-Hart.	0.2	
5/31/2024	AHS	Created a filing checklist for all components of reply, declarations, mot to seal.	0.6	
5/31/2024	AHS	Reviewed notes from prior calls with Bernie Jestrabek-Hart and e-mailed co-counsel about them.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 929

SERVICES

Date	Person	Description of Services	Hours	Discount
5/31/2024	AHS	Conf. w/ DLE re pulling documents for reply decl, motion for sanctions, and plan for filing on 6/4.	0.9	
5/31/2024	AHS	Reviewed Jeff Mastin's expert report and notes from prior calls with Bernie Jestrabek Hart to prepare for call with her and co-counsel.	0.8	
5/31/2024	AHS	Call with Bernie Jestrabek Hart and co-counsel to discuss declaration ISO reply ISO subclass cert.	0.9	
5/31/2024	AHS	Revised draft decl. of Bernie Jestrabek-Hart and sent to co-counsel.	0.4	
5/31/2024	AHS	Emailed with co-counsel re: declarations and attachments for reply ISO subclass cert.	0.5	
5/31/2024	AHS	Revised Bernie Jestrabek-Hart declaration.	0.4	
5/31/2024	FGL	Email from/to JSY re Marquis Declaration in support of Reply and review/organize same for efiling.	0.1	
5/31/2024	FGL	Review AHS email re efiling of Pltff's Response in Opposition to Defs' Admin Motion for Leave to Enlarge the Page Limit and efile same.	0.2	
5/31/2024	DLE	Save and circulate filed pleadings.	0.6	
5/31/2024	DLE	Meeting with AHS to discuss case tasks and issues.	0.9	
5/31/2024	DLE	Attend and note-take weekly co-counsel meeting and firm-only debrief.	1.1	
5/31/2024	DLE	Organize and circulate notes from weekly co-counsel meeting.	0.4	
5/31/2024	DLE	Identify, locate, and save down documents for exhibits for reply declaration.	1.2	
6/1/2024	GCG	Review BJH reply declaration ISO class cert.	0.1	
6/1/2024	GCG	Emails to SJR, JSY and MWB re sanctions motion.	0.1	
6/1/2024	GCG	Review MJ comments on reply pleadings.	0.1	
6/1/2024	GCG	Review GW email re Fountaingrove.	0.1	
6/1/2024	JSY	Emails re sanctions motion and time to meet.	0.2	
6/1/2024	SJR	Emails.	0.2	
6/2/2024	GCG	Email w/ JSY and GW re editing reply brief.	0.1	
6/2/2024	JSY	Emails re sanctions motion and Reply brief.	0.2	
6/2/2024	SJR	Emails re conference.	0.2	
6/3/2024	JSY	Conf. w/ BBK re Reply tasks.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 930

SERVICES

Date	Person	Description of Services	Hours	Discount
6/3/2024	JSY	Team meeting re Reply.	0.4	
6/3/2024	JSY	Edit GBW Reply Decl and sealing pleadings; emails re same.	0.4	
6/3/2024	JSY	Emails and conf. re BJH declaration.	0.2	
6/3/2024	JSY	Edit brief and intro; emails re same.	0.5	
6/3/2024	SJR	Emails re meeting to discuss sanctions.	0.3	
6/3/2024	BBK	Reviewing emails from Opposing Counsel re Ds' proposed supp response to Rogs re access barriers and re: production of issue registers as ordered by Court.	0.1	
6/3/2024	BBK	Conferring w/ RBGG team re PRA responses from Scotts Valley Fire Dep't.	0.1	
6/3/2024	BBK	Meeting w/ AHS re plan for record-cite check of Reply ISO Class Cert Motion.	0.2	
6/3/2024	BBK	Conferring w/ DE re deadlines for briefing on sanctions motion and hearing on same.	0.1	
6/3/2024	BBK	Reviewing Court Order denying Ds' request for 50 pages for MSJ; conferring w/ team re same.	0.1	
6/3/2024	BBK	Meeting w/ co-counsel re Reply Brief and supporting papers.	0.3	
6/3/2024	BBK	Conferring w/ JSY/AHS/DE/R.Steyer re additions/revisions to Reply Wallace Decl.	0.2	
6/3/2024	BBK	Conferring w/ team re finalizing and obtaining signature from BJH for Reply Decl.	0.2	
6/3/2024	BBK	Reviewing Ds' Notice of Correction re Opp to Cert Motion; conferring w/ JSY/AHS re same.	0.1	
6/3/2024	BBK	Analyzing Ds' access expert contention that Pls' experts did not inspect multiple units offered by BD during 2024 inspections; emailing w/ M. Johnson re same.	0.3	
6/3/2024	BBK	Conducting record cite check and drafting proposed revisions to Reply Brief.	3.7	
6/3/2024	BBK	Conferring w/ JSY and AHS re record cite-check and revisions to Reply.	0.5	
6/3/2024	BBK	Emailing w/ RBGG team and FGL/WP re plan for filing Reply and supporting papers.	0.1	
6/3/2024	BBK	Reviewing/responding to G. Wallace emails re proposed revisions to Reply Brief; conferring w/ JSY re same.	0.3	
6/3/2024	AHS	Met with BBK re fact citecheck of reply brief.	0.2	
6/3/2024	AHS	Revised Jestrabek-Hart declaration and communicated with her about getting her signature.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 931

SERVICES

Date	Person	Description of Services	Hours	Discount
6/3/2024	AHS	Emailed team re: PRA requests.	0.2	
6/3/2024	AHS	Conducted fact/record-based citecheck of second half of reply brief.	2.6	
6/3/2024	AHS	Call with co-counsel to discuss status of and outstanding items for reply brief.	0.4	
6/3/2024	AHS	Consolidated notes from co-counsel call and circulated them to team internally.	0.2	
6/3/2024	AHS	Met with DLE to discuss PRA requests and getting info from Scotts Valley Fire Dept.	0.2	
6/3/2024	DLE	Download and circulate filed pleadings; add deadlines to office calendar.	0.6	
6/3/2024	DLE	Confer with representatives at fire department re PRA requests.	0.5	
6/3/2024	DLE	Begin preparing exhibits for Wallace reply declaration.	0.5	
6/4/2024	GCG	Confs w/ JSY and BBK and emails to team re Reply filing.	0.5	
6/4/2024	GCG	Meet w/ SJR, MWB and JSY re opposition to and implications of sanctions motion.	0.9	
6/4/2024	JSY	Emails re reply.	0.1	
6/4/2024	JSY	Conf. w/ GCG re reply.	0.2	
6/4/2024	JSY	Meeting re sanctions motion.	0.7	
6/4/2024	JSY	Review, edit, finalize documents for Reply; multiple emails and conf. re same.	3.1	
6/4/2024	MWB	Zoom call with SJR, JY & GCG re: sanctions motion.	0.6	
6/4/2024	MWB	Email re: sanctions motion.	0.2	
6/4/2024	SJR	Zoom with MWB, GG, JY re sanctions motion.	0.8	
6/4/2024	BBK	Reviewing Ds' Reply ISO Motion for Clarification of Class Def.	0.2	
6/4/2024	BBK	Managing preparation of filing of Reply and supporting papers (including reviewing/revising/approving brief and supporting docs, conferring w/ co-counsel and RBGG team re same).	9.2	
6/4/2024	BBK	Supervising filing of Reply and supporting papers.	1.0	
6/4/2024	AHS	Met with BBK to discuss status of component's of reply filing and gameplan.	0.5	
6/4/2024	AHS	Updated filing checklist.	0.2	
6/4/2024	AHS	Responded to PRA request follow up inquiries and sent my thoughts and recommended action plan to DLE.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/4/2024	AHS	Reviewed emails and new documents from team re: finalizing materials for filing, and updated filing checklist.	0.6	
6/4/2024	AHS	Read Defendants Reply ISO their motion to clarify/amend the class definition.	0.3	
6/4/2024	AHS	Discussed timeline and plan for finalizing filing components with combinations of BBK, JY, GLP, DLE.	0.6	
6/4/2024	AHS	Reviewed edits from co-counsel, discussed them, and input them in redline to reply brief.	0.4	
6/4/2024	AHS	Emails re: updates on expert declarations nearing finalization.	0.5	
6/4/2024	AHS	Updated filing checklist.	0.5	
6/4/2024	AHS	Reviewed all "final" docs.	0.4	
6/4/2024	AHS	Reviewed emails from team re: Mastin declaration and exhibits.	0.2	
6/4/2024	AHS	Updated internal case tasks list.	0.3	
6/4/2024	AHS	Coordinated with co-counsel and worked with BBK DLE CG FGL to finalize all documents and file.	2.6	
6/4/2024	FGL	Confer with BBK re status of efiling, exhibits to same.	0.2	
6/4/2024	FGL	Review KES emails re proof of service and re filing under seal and review Northern District procedure for filing under seal and re exhibits.	0.6	
6/4/2024	FGL	Review JSY message re proof of service of unredacted Wallace Declaration and draft proof of service re same.	0.2	
6/4/2024	FGL	Email from/to JSY and revise proof of service.	0.1	
6/4/2024	FGL	Review AHS emails (x3) re status of documents for filing.	0.2	
6/4/2024	FGL	Review BBK email re exhibits to Waters and Mastin declarations and confer with BBK re caption pages for same.	0.2	
6/4/2024	FGL	Confer with JSY, BBK, AHS re status of filing and pending declarations.	0.2	
6/4/2024	FGL	Review BBK email re Waters decl exhibits and review/compress same.	2.7	
6/4/2024	FGL	Revise, finalize/format proof of service re unredacted version of Wallace Reply Decl and prepare email to opposing counsel for service of same.	0.2	
6/4/2024	FGL	Confer with DLE re issue with exhibit and review/troubleshoot same.	0.1	
6/4/2024	FGL	Confer with BBK re revision to Exhs F, G and revise same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 933

SERVICES

Date	Person	Description of Services	Hours	Discount
6/4/2024	FGL	Confer with BBK and email serve unredacted Wallace Reply Decl iso Motion for Certification of Facility-Level Subclasses on opposing counsel.	0.1	
6/4/2024	FGL	Sign proof of service and format/finalize for efiling.	0.1	
6/4/2024	FGL	Confer with BBK, AHS and efile Admin Motion to Consider Whether to File Defs' Designated Materials iso Plaintiffs' Reply iso Motion for Certification of Facility-Level Subclasses.	0.2	
6/4/2024	FGL	Email Word version of Proposed Order re same to Judge Gilliam.	0.1	
6/4/2024	FGL	Confer with BBK, AHS and efile Plaintiffs' Reply iso Motion for Certification and supporting Declarations and exhibits (x19 docs).	0.5	
6/4/2024	DLE	Finalize and circulate exhibits for Wallace reply declaration.	0.5	
6/4/2024	DLE	Save and circulate filed pleading.	0.2	
6/4/2024	DLE	Call with representative from police department re public records request.	0.2	
6/4/2024	DLE	Assist with preparing exhibits and attend to filing of Reply ISO Subclass Cert Motion.	2.0	
6/5/2024	GCG	Conf w/ JSY re oral argument on motion for class certification and other briefing underway.	0.2	
6/5/2024	JSY	Conf. w/ GCG re ongoing projects.	0.2	
6/5/2024	JSY	Emails re filing issues.	0.1	
6/5/2024	BBK	Conferring w/ FGL and JSY re error in uploading Marquis Decl ISO Brief and re: filing corrected version of same; reviewing emails w/ Court re same.	0.5	
6/5/2024	BBK	Reviewing email from opposing counsel re: ED custodians for court-ordered ESI production; emailing w/ co-counsel re same.	0.1	
6/5/2024	BBK	Reviewing/commenting on M. Johnson draft email response to Ds re: court-ordered responses to Interrogatories re: Access Barriers.	0.2	
6/5/2024	BBK	Reviewing emails w/ opposing counsel re Ds' seeking stipulation to file under seal certain docs to be filed with Opposition to Pls' Motion for Reconsideration of deposition order.	0.2	
6/5/2024	AHS	Reviewed PRA-related materials.	0.5	
6/5/2024	FGL	Confer with DLE re issue with Dkt 805-3 Marquis Decl and research/review Court docket to troubleshoot same, email to ECF Help Desk re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/5/2024	FGL	Email from ECF Help Desk and detailed email to Team re correction of docket re same.	0.1	
6/5/2024	FGL	Review ECF instructions re efiling corrected version and re-PDF Marquis declaration.	0.2	
6/5/2024	FGL	Further confer with DLE re email correction for Judge Gilliam and research same.	0.2	
6/5/2024	FGL	Confer with DLE re efiling of corrected Marquis Decl.	0.2	
6/5/2024	FGL	Efile corrected Marquis Decl with DLE and messages with BBK re same.	0.2	
6/5/2024	FGL	Email to Judge Gilliam's' docket correction clerk re correction of Marquis Decl.	0.1	
6/5/2024	FGL	Email from K. Means/Clerk re confirmation of correction of Dkt 805-3.	0.1	
6/5/2024	DLE	Confer with FGL re efiling of corrected Marquis Decl.	0.2	
6/5/2024	DLE	Efile corrected Marquis Decl with FGL.	0.2	
6/5/2024	DLE	Save and circulate records received from PRA requests; update tracking chart re same; confer with representative from fire department re issue with production.	0.6	
6/5/2024	DLE	Save and circulate many filed pleadings.	0.9	
6/6/2024	GCG	Conf w/ BH re status of briefing and team meeting.	0.1	
6/6/2024	GCG	Email to GW re sanctions opposition.	0.1	
6/6/2024	BBK	Conferring w/ GCG and co-counsel re meeting re case priorities and immediate tasks.	0.2	
6/6/2024	BBK	Emailing w/ RBGG team re PRA responses from fire and police departments w/ six BD facilities in their jurisdictions.	0.1	
6/6/2024	BBK	Reviewing/analyzing Ds' Opp to Pls' Motion for Reconsideration of Deposition Order.	0.2	
6/6/2024	BBK	Reviewing article sent by GCG re resident death at BD San Ramon.	0.1	
6/6/2024	AHS	Edited and commented on PRA response tracking sheet.	0.6	
6/6/2024	AHS	Discussed claims and upcoming dispositive motions with DLE.	0.7	
6/6/2024	AHS	Met with DLE to discuss PRA tracking spreadsheet and appropriate follow up with various counties.	0.4	
6/6/2024	DLE	Confer with AHS re PRA requests and responses; update tracking chart.	0.6	
6/6/2024	DLE	Save and circulate filed pleadings.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 935

SERVICES

Date	Person	Description of Services	Hours	Discount
6/7/2024	GCG	Review reply ISO motion for reconsideration.	0.1	
6/7/2024	GCG	Email w/ GW re Sanctions motion.	0.1	
6/7/2024	BBK	Reviewing Pls' Reply ISO Motion for Reconsideration of Deposition Order.	0.2	
6/7/2024	BBK	Emailing w/ opposing counsel re: depositions of experts; reviewing AHS updated case task list.	0.1	
6/7/2024	AHS	Updated and circulated internal case tasks list.	0.1	
6/7/2024	DLE	Download and circulate filed pleading.	0.2	
6/9/2024	GCG	Review and analyze pleadings from defendants' sanctions motion.	0.5	
6/9/2024	GCG	Email key witnesses re trial and hearing schedule.	0.2	
6/10/2024	GCG	Prepare for and conduct call w/ GW re sanctions motion.	0.4	
6/10/2024	GCG	Email GW re same.	0.1	
6/10/2024	GCG	Emails to BBK re motion for summary judgment and hearing on class certification.	0.1	
6/10/2024	BBK	Reviewing R. Steyer - OC emails re Bates stamping errors in recent D supp prods; reviewing emails w/ co-counsel re expert deposition dates.	0.1	
6/10/2024	BBK	Reviewing 9th Cir opinion on voluntary cessation exception to mootness issued on 6/7 and sharing w/ RBGG team due to relevance to dispositive motions re: Fleet Safety Policy-related claims.	0.3	
6/10/2024	BBK	Reviewing/commenting on GCG notes re opposition to sanctions motion.	0.2	
6/10/2024	BBK	Emailing w/ GCG re preparing motion for partial summary judgment.	0.2	
6/10/2024	BBK	Emailing w/ P. Lindstrom re 6/27 hearing on class cert motion; conferring w/ RBGG team re same.	0.2	
6/10/2024	AHS	Reviewed emails with team re: opp to defs' mot for sanctions.	0.3	
6/10/2024	AHS	Emailed with co-counsel to coordinate declaration by named plf ISO plfs' opp to defs' mot for sanctions.	0.2	
6/10/2024	KES	Brief review of filed reply papers.	0.3	
6/10/2024	DLE	Follow up with various police and fire departments regarding PRA requests; update tracking chart re same.	1.5	
6/11/2024	GCG	Email to BBK and team re sanctions opposition.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 936

SERVICES

Date	Person	Description of Services	Hours	Discount
6/11/2024	BBK	Phone call w/ GCG re commenting on Opposition to Sanction Motion and research re: voluntary cessation exception to mootness for dispositive motions practice.	0.1	
6/11/2024	BBK	Reviewing AHS email re: draft B. Jestrabek-Hart declaration ISO Opp to Sanctions Motion; attending to payment of G. Waters invoice for Reply Decl ISO Motion for Certification of Subclasses.	0.1	
6/11/2024	BBK	Reviewing/responding to AHS questions re comm'ns w/ San Ramon Fire Dep't re PRA Responses.	0.2	
6/11/2024	BBK	Emailing w/ KES re arranging for wheelchair-accessible transportation for BJH and P. Lindstrom to 6/27 hearing.	0.2	
6/11/2024	BBK	Emailing w/ BJH and P. Lindstrom re 6/27 hearing.	0.2	
6/11/2024	AHS	Communicated with named plaintiff and co-counsel re: declaration.	0.4	
6/11/2024	AHS	Emailed with DLE and BBK re: PRA request to San Ramon.	0.5	
6/11/2024	KES	Arrange for client WAV transportation to June 27 hearing.	0.5	
6/11/2024	KES	Review expert invoice.	0.1	
6/11/2024	DLE	Save and circulate filed pleading.	0.2	
6/11/2024	DLE	Confer with AHS re PRA request responses.	0.5	
6/12/2024	BBK	Reviewing emails w/ opposing counsel re correcting Bates Stamps Errors on recent doc productions and re: Ds' court-ordered supp Rog Resps.	0.1	
6/12/2024	BBK	Emailing w/ M. Johnson re status of draft Opp to Sanctions Motion.	0.1	
6/12/2024	BBK	Emailing w/ RBGG team re service of Supp Rog Resps by Ds.	0.1	
6/13/2024	GCG	Review and revise sanctions opposition.	0.5	
6/13/2024	GCG	Review and revise BJH declaration.	0.1	
6/13/2024	GCG	Conf w/ BBK and emails to GW and team re same.	0.2	
6/13/2024	BBK	Emailing w/ B. Jestrabek-Hart re 6/27 hearing on class cert motion.	0.1	
6/13/2024	BBK	Reviewing/revising/commenting on draft Opp to Sanctions Motion.	2.0	
6/13/2024	BBK	Reviewing/commenting on draft Stiner and Jestabek-Hart Decls ISO Opp to Sanctions Motion.	0.3	
6/13/2024	BBK	Conferring w/ GCG re RBGG comments on draft Opp to Sanctions motion.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/13/2024	BBK	Further revisions to draft Opp to Sanctions motion.	0.3	
6/13/2024	BBK	Reviewing M. Johnson report to team re: inadequacy of Ds' Supp Rog Responses.	0.1	
6/13/2024	BBK	Emailing w/ G. Wallace re revisions to Opp to Sanctions Motion.	0.1	
6/13/2024	BBK	Emailing w/ M. Johnson re executing client declarations ISO Opp to Sanctions Motion.	0.2	
6/13/2024	KES	Review Defs' supplemental interrogatory responses and confer DE re same.	0.4	
6/13/2024	DLE	Follow-up with departments re PRA request responses; update tracking chart re same.	0.8	
6/13/2024	DLE	Save and circulate interrogatory productions from Defendants.	0.3	
6/14/2024	GCG	Review and revise draft sanctions opposition.	0.3	
6/14/2024	GCG	Conference with BBK and emails GW-team re same.	0.2	
6/14/2024	GCG	Begin preparing for moot of oral argument on Motion for Class Certification.	0.2	
6/14/2024	GCG	Email RBGG team re same and re class representatives' attendance at oral argument.	0.1	
6/14/2024	BBK	Comm'ns w/ AHS and co-counsel re team meeting on case tasks and priorities.	0.2	
6/14/2024	BBK	Phone calls and emails w/ GCG re draft Opp to Sanctions Motion.	0.2	
6/14/2024	BBK	Phone calls and emails w/ G. Wallace re draft Opp to Sanctions Motion.	0.2	
6/14/2024	BBK	Reviewing/revising/commenting on revised Opp to Sanctions Motion.	1.0	
6/14/2024	BBK	Comm'ns w/ co-counsel re outreach from former putative class member re case status (including comm'ns w/ KES re determining whether/when we communicated w/ her in the past).	0.5	
6/14/2024	BBK	Reviewing/revising R. Steyer draft response email to attorney of daughter of former BD resident re case status.	0.4	
6/14/2024	BBK	Emailing w/ GCG re prep for class cert hearing and other pending motions.	0.2	
6/14/2024	KES	Research contact history with relative of former Brookdale resident.	0.5	
6/14/2024	KES	Gather docs for GCG hearing prep.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/15/2024	GCG	Emails with GW re Kailes report.	0.2	
6/16/2024	GCG	Email BBK - putative class member re case status.	0.1	
6/16/2024	BBK	Drafting/sending revised follow-up email to attorney of daughter of former BD resident IRT her follow-up email of 6/15; updating RBGG team and co-counsel re same.	0.5	
6/17/2024	GCG	Email to GW re oral argument on motions to clarify and certify.	0.2	
6/17/2024	BBK	Emailing w/ co-counsel re moot oral argument for hearing on class certification motion; reviewing email from Ds re supp doc production to comply w/ Court's Discovery Order.	0.1	
6/17/2024	BBK	Conferring w/ AHS re assignment for motion for partial summary judgment.	0.2	
6/17/2024	BBK	Emailing J. & R. Carlson re 6/27 hearing on class cert motion.	0.1	
6/17/2024	BBK	Emailing w/ AHS and DE re PRA response from San Ramon Fire Dep't.	0.1	
6/17/2024	AHS	Reviewed emails with team and cocounsel re inquiry from possible class member and pending motions motion.	0.3	
6/17/2024	AHS	Read Plfs' opp to Defs' mot for sanctions.	0.5	
6/17/2024	AHS	Read and sent DLE correspondence re PRA requests.	0.1	
6/17/2024	AHS	Followed up with San Ramon county re PRA requests.	0.6	
6/17/2024	KES	Download and circulate opposition to sanctions motions.	0.4	
6/17/2024	DLE	Confer with representative at San Ramon Fire Department re PRA request; fill out release of info form and send.	0.4	
6/18/2024	DLE	Send check to fire department for access to public records.	0.2	
6/19/2024	GCG	Review DM email re trial witness preparation; email GW re same.	0.1	
6/20/2024	GCG	Prepare for moot.	0.1	
6/20/2024	GCG	Conf w/ and email to JSY re same.	0.1	
6/20/2024	GCG	Email to GW re trial preparation.	0.1	
6/20/2024	GCG	Conf w/ BBK re outline of task for MSJ.	0.1	
6/20/2024	GCG	Email team re factual investigation.	0.1	
6/20/2024	JSY	Conf. w/ GCG re status and sanctions motion opp.	0.2	
6/20/2024	JSY	Review opp to sanctions motion.	0.5	
6/20/2024	BBK	Phone call w/ GCG re plan for motion for partial summary judgment.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 939

SERVICES

Date	Person	Description of Services	Hours	Discount
6/20/2024	BBK	Preparing legal research assignment voluntary cessation exception to mootness for dispositive motions.	0.4	
6/20/2024	BBK	Meeting w/ NH re legal research assignment re voluntary cessation exception to mootness; sending follow-up emails w/ materials re same.	0.4	
6/20/2024	BBK	Reviewing emails from opposing counsel re: expert depositions and re: Ds' court-ordered supp doc productions.	0.1	
6/20/2024	BBK	Reviewing/revising AHS draft fact citations for motion for partial summary judgment argument re: named Pls' status as people with mobility or vision disabilities.	0.4	
6/20/2024	BBK	Preparing moot oral argument questions for G. Wallace re: motion for clarification of class definition; conferring w/ GCG/JSY re same.	1.2	
6/20/2024	BBK	Emailing w/ AHS re additional fact citation work for motion for partial summary judgment.	0.1	
6/20/2024	AHS	Sent materials received in response to PRA requests to DLE.	0.1	
6/20/2024	AHS	Inserted facts and citations to draft motion for summary judgment.	2.4	
6/20/2024	NKH	Assignment meeting with Ben re voluntary cesssation.	0.4	
6/20/2024	NKH	Research voluntary cessation.	1.0	
6/20/2024	DLE	Follow up with police and fire departments regarding public records requests; log information in tracking sheet.	1.2	
6/21/2024	GCG	Prepare for and conduct moot of GW oral argument on motion to certify subclasses.	1.2	
6/21/2024	GCG	Conf w/ JSY and emails to GW re questions raised on moot.	0.3	
6/21/2024	GCG	Emails to MJ and defendants re discovery disputes and expert discovery.	0.2	
6/21/2024	GCG	Begin preparing for oral argument on motion to clarify.	0.8	
6/21/2024	GCG	Conf w/ JSY and email BBK and AS re same.	0.3	
6/21/2024	JSY	LM for JA.	0.1	
6/21/2024	JSY	Team meeting and prep for hearing.	1.1	
6/21/2024	JSY	Emails and conf. re motion to clarify.	0.5	
6/21/2024	JSY	Prep for moot re facility level subclasses motion and multiple emails and conf. re same.	1.5	
6/21/2024	BBK	Emailing w/ AHS re working w/ investigator; emailing w/ KES re investigating recent death by suicide of San Ramon resident.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/21/2024	BBK	Emailing w/ AHS re project for motion for partial summary judgment.	0.2	
6/21/2024	BBK	Reviewing DSS report re death of BD San Ramon resident by suicide; analyzing same for RBGG team.	0.1	
6/21/2024	BBK	Planning/drafting proposal for GCG/JSY re timeline and plan for finalizing motion for partial summary judgment.	0.5	
6/21/2024	BBK	Reviewing JSY draft moot oral argument questions for hearing on class cert motion.	0.1	
6/21/2024	BBK	Reviewing DE notes from moot OA and follow-up emails re prep for hearing on class cert motion.	0.3	
6/21/2024	BBK	Reviewing emails w/ RBGG team re prep for arguing hearing on motion for clarification of class definition; emailing w/ team re same.	0.2	
6/21/2024	BBK	Reviewing emails w/ opposing counsel re scheduling expert depositions and re: inadequacy of court-ordered Rog responses re: access barriers.	0.1	
6/21/2024	AHS	Emailed with team re upcoming work on motion for summary judgment and contact with potential witnesses.	0.3	
6/21/2024	AHS	Participated in portion of meeting with co-counsel to prepare for hearing on motion to certify sub-classes.	1.0	
6/21/2024	AHS	Reviewed defs' mot for clarification/amendment of class definition in preparation for hearing.	0.2	
6/21/2024	AHS	Met with JY to discuss preparation for hearing on defs' admin motion to clarify or amend class definition.	0.3	
6/21/2024	KES	Online research re San Ramon suicide.	0.2	
6/21/2024	KES	Gather materials for oral argument prep.	0.1	
6/21/2024	NKH	Research voluntary cessation.	2.0	
6/21/2024	DLE	Attend and note-take weekly co-counsel meeting and firm-only debrief.	1.1	
6/21/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.3	
6/22/2024	GCG	Review cases and pleadings to prepare for motion to clarify oral argument.	3.2	
6/22/2024	GCG	Emails to GW, JY, BBK and team re issues regarding motion.	0.5	
6/22/2024	GCG	Review and analyze motion to certify to assist GW at oral argument.	1.0	
6/22/2024	JSY	Emails re motion to clarify class definition.	0.1	
6/22/2024	BBK	Researching court's order re: hearings; updating RBGG team re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/22/2024	BBK	Emailing w/ GCG re prep for hearing on motion for clarification of class definition.	0.3	
6/23/2024	GCG	Prepare for class cert hearing.	0.1	
6/24/2024	GCG	Prepare for and conduct meeting w/ co-counsel to discuss moot 2 motions set for oral argument.	1.2	
6/24/2024	GCG	Confs w/ and emails to BBK and JSY re plan for motion to clarify.	0.5	
6/24/2024	GCG	Review and revise BBK outline for oral argument on motion to clarify.	0.2	
6/24/2024	GCG	Review and analyze cases cited in motion to clarify.	0.3	
6/24/2024	GCG	Review and analyze FSP and documents related to transportation subclass.	0.2	
6/24/2024	JSY	Multiple conf. re motion to clarify and trial prep.	0.4	
6/24/2024	JSY	Emails and conf. re prep for hearing and attendance at hearing.	0.3	
6/24/2024	JSY	Emails re prep for hearings re motion for class cert and motion to clarify.	0.2	
6/24/2024	BBK	Reviewing Ds' Reply ISO Motion for Sanction.	0.2	
6/24/2024	BBK	Meeting w/ co-counsel and RBGG team re plan for OA on motion for clarification of class definition.	0.7	
6/24/2024	BBK	Meeting w/ GCG re prep for OA on motion for clarification of class definition.	0.4	
6/24/2024	BBK	Conferring w/ KES and DE re preparing photos of access barriers for motion for partial summary judgment.	0.2	
6/24/2024	BBK	Meeting w/ AHS re prep for hearing on motion for clarification of class list and re drafting/preparing motion for partial summary judgment.	0.9	
6/24/2024	BBK	Emailing w/ RBGG team re deadlines for tasks for motion for partial summary judgment.	0.1	
6/24/2024	BBK	Reviewing emails w/ opposing counsel re meeting and conferring over Ds' inadequate responses to ROGs re access barriers.	0.1	
6/24/2024	BBK	Conferring w/ KES and AHS re transportation for BJH and PL to hearing.	0.1	
6/24/2024	BBK	Reviewing/commenting on T. Close research re Brookdale's data on residents' mobility aids.	0.2	
6/24/2024	BBK	Drafting outline for OA on motion for clarification of class definition.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/24/2024	BBK	Conferring w/ GCG re prep for OA on motion for clarification of class definition.	0.3	
6/24/2024	BBK	Conferring w/ GCG re outreach to J. & R. Carlson re attending 6/27 hearing.	0.1	
6/24/2024	BBK	Emailing w/ RBGG team and co-counsel re prep for OA on class cert motion.	0.2	
6/24/2024	BBK	Conferring w/ RBGG team re moot OA for GCG on motion for clarification of class definition.	0.1	
6/24/2024	BBK	Preparing case summaries of cases cited in briefing on motion for clarification of class definition for GCG's prep for OA; revising AHS draft case summaries for same.	2.5	
6/24/2024	AHS	Reviewed team emails in preparation for call with co-counsel.	0.3	
6/24/2024	AHS	Meeting with co-counsel to discuss defs' admin motion to clarify/amend class definition.	0.7	
6/24/2024	AHS	Met with BBK to discuss strategy and preparation for hearing on subclass cert motion and defs' mot to clarify/amend class list.	0.9	
6/24/2024	AHS	Legal research in preparation for hearing on defs' mot to clarify/amend class list.	4.0	
6/24/2024	AHS	Met with JY to discuss plan for hearing on Thursday.	0.3	
6/24/2024	AHS	Emailed with team re logistics for meeting plaintiffs at courthouse for hearing on 6/27.	0.3	
6/24/2024	AHS	E-mailed with team re case summaries in preparation for hearing on defs' mot to clarify/amend class definition.	0.3	
6/24/2024	KES	Gather case for GCG.	0.1	
6/24/2024	KES	Emails with team re client WAV transportation to hearing.	0.2	
6/24/2024	DLE	Attend and note-take meeting with co-counsel re upcoming hearing.	0.7	
6/24/2024	DLE	Finalize and circulate notes from co-counsel meeting.	0.2	
6/25/2024	GCG	Review and analyze motion to clarify pleadings and cases.	0.7	
6/25/2024	GCG	Revise argument outline.	0.6	
6/25/2024	GCG	Review class cert pleadings.	0.3	
6/25/2024	GCG	Emails w/ co-counsel re preparation for hearing on class cert.	0.5	
6/25/2024	JSY	Emails and conf. re moot re motion to clarify.	0.1	
6/25/2024	BBK	Emailing w/ RBGG team re moot OA for GCG for motion for clarification of class definition.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/25/2024	BBK	Emailing w/ RBGG team and co-counsel re prep for hearing on motion for clarification of class definition and on class cert motion.	0.2	
6/25/2024	BBK	Conferring w/ J. Carlson re attending class cert hearing; updating GCG re same.	0.2	
6/25/2024	BBK	Reviewing M. Johnson analysis re Ds' responses to Rogs re access barriers and proposed plan for M&C re same.	0.2	
6/25/2024	BBK	Reviewing T. Close notes from meet & confer on access barrier Rog Responses, follow-up email from E. Rutner re: request for dates for expert depositions, and M. Johnson proposed follow-up email to Ds memorializing M&C position re: Rog Resps.	0.2	
6/25/2024	AHS	Reviewed case summaries.	0.4	
6/25/2024	AHS	Coordinated details for meeting plaintiffs at hearing.	0.1	
6/25/2024	AHS	Reviewed emails with team and set up moot for hearing on mot to clarify/modify class definition.	0.3	
6/25/2024	DLE	Receive correspondence from fire department; update tracking chart.	0.2	
6/26/2024	GCG	Review and analyze motion to clarify cases and pleadings.	0.5	
6/26/2024	GCG	Revise oral argument outline.	0.5	
6/26/2024	GCG	Emails w/ co-counsel re same.	0.3	
6/26/2024	GCG	Moot argument with RBGG.	0.8	
6/26/2024	GCG	Review GW and MJ memo re potential issues court will raise at motion to certify.	0.2	
6/26/2024	GCG	Review TC memo re status of FSP discovery.	0.1	
6/26/2024	GCG	Emails to MJ and ER re defendants' interrogatory responses re barriers.	0.1	
6/26/2024	GCG	Review and analyze defendants' May 7 meet and confer letter.	0.2	
6/26/2024	GCG	Meet w/ co-counsel to discuss drafting of expert report.	0.5	
6/26/2024	JSY	Conf. w/ GCG re motion to clarify; prep for moot.	0.4	
6/26/2024	JSY	Emails and calls re JA.	0.2	
6/26/2024	JSY	Moot re motion to clarify.	0.8	
6/26/2024	BBK	Emailing w/ R. Carlson re attending class cert hearing.	0.2	
6/26/2024	BBK	Conferring w/ RBGG team re R. Carlson attending class cert hearing.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/26/2024	BBK	Reviewing co-counsel emails re Flores and Schroyer availability for deposition and M. Johnson email to opposing counsel re same.	0.1	
6/26/2024	BBK	Reviewing G Wallace written responses to moot questions for class cert hearing and M. Johnson comments re same.	0.5	
6/26/2024	BBK	Reviewing T Close memo re status of court-ordered FSP-related discovery and recommendations re: FU on same.	0.1	
6/26/2024	BBK	Emailing w/ co-counsel re strategy for hearing on motion for clarification of class def.	0.1	
6/26/2024	BBK	Reviewing KES update re transportation for B. Jestrabek-Hart and P. Lindstrom for class cert hearing; reviewing JSY update re J. Algarme.	0.1	
6/26/2024	BBK	Phone call w/ GCG re prep for hearing on motion for clarification of class def.	0.2	
6/26/2024	BBK	Emailing w/ NH re legal research for motion for partial summary judgment re voluntary cessation exception to mootness doctrine.	0.3	
6/26/2024	BBK	Preparing for moot OA for GCG on motion for clarification of class def.	0.3	
6/26/2024	BBK	Conducting moot OA for GCG on motion for clarification of class def.	0.7	
6/26/2024	BBK	Reviewing E. Rutner email purporting to restrict Pls' argument at class cert hearing re: Ds' failure to dispute access barriers and conferring w/ co-counsel re responding to same.	0.1	
6/26/2024	AHS	Read emails from team re: Thursday hearing and expert depositions.	0.2	
6/26/2024	AHS	(Billing Judgment) Coordinated details in anticipation of plfs' travel to courthouse for hearing.	0.0	0.3
6/26/2024	AHS	Mooted GCG for hearing on defs' mot to clarify/modify class definition.	0.7	
6/26/2024	KES	Confirm client transportation.	0.2	
6/26/2024	KES	Review status of barrier lists for summary judgment.	0.3	
6/26/2024	NKH	Research voluntary cessation.	2.0	
6/26/2024	NKH	Review email answer from Ben BK.	0.3	
6/27/2024	GCG	Prepare for oral argument on motion to clarify.	1.0	
6/27/2024	GCG	(Reduced Charge) Travel to participate in oral argument on motion to certify.	0.5	0.5
6/27/2024	GCG	Debrief with clients, MH and legal team afterwards.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/27/2024	GCG	(Reduced Charge) Travel home from court.	0.2	0.3
6/27/2024	GCG	Participate in oral argument on motion to certify.	1.3	
6/27/2024	JSY	(Reduced Charge) Travel back from hearing.	0.4	0.4
6/27/2024	JSY	Attend hearing re subclass certification motion and debrief with team after hearing.	2.0	
6/27/2024	JSY	Conf. w/ GCG re hearing.	0.3	
6/27/2024	JSY	Conf. w/ LAE re hearing.	0.1	
6/27/2024	JSY	Emails re hearing.	0.1	
6/27/2024	AHS	Emailed with Hemet county and DLE re PRA request.	0.1	
6/27/2024	AHS	Summaried case for GCG for hearing.	0.4	
6/27/2024	AHS	(Reduced Charge) Traveled to courthouse to meet clients in advance of hearing.	0.2	0.3
6/27/2024	AHS	Met clients and attended hearing on motion for certification of subclasses.	2.7	
6/27/2024	AHS	(Reduced Charge) Traveled from courthouse back to office.	0.2	0.2
6/27/2024	AHS	Discussed mootness research with summer associate.	0.2	
6/27/2024	AHS	Discussed hearing and case status with DLE.	0.5	
6/27/2024	AHS	Identified and sent to summer associate FSPs and related memo.	0.2	
6/27/2024	DLE	(Billing Judgment) Travel to courthouse to attend hearing.	0.0	0.5
6/27/2024	DLE	(Billing Judgment) Attend hearing.	0.0	2.8
6/27/2024	DLE	(Billing Judgment) Travel to office from attending hearing.	0.0	0.5
6/27/2024	DLE	Confer with AHS re case issues and assignments.	0.5	
6/28/2024	GCG	Meet with co-counsel team to discuss discovery issues and expert witnesses.	1.0	
6/28/2024	GCG	Confer with GW re upcoming hearing.	0.1	
6/28/2024	GCG	Confer with JSY re MSJ.	0.1	
6/28/2024	GCG	Confer with RBGG team re motion for summary judgment.	0.2	
6/28/2024	JSY	Team meeting, including meeting with RBGG only, re case tasks and priorities.	1.2	
6/28/2024	JSY	Research issues re summary judgment motion and conforming pleadings to proof; emails re same.	0.4	
6/28/2024	JSY	Call JA; email MA re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/28/2024	JSY	Conf. w/ GCG re hearing and ongoing projects.	0.3	
6/28/2024	JSY	Emails re JA status.	0.1	
6/28/2024	BBK	Emailing w RBGG team & co-counsel re class cert hearing; reviewing AHS notes re same.	0.1	
6/28/2024	BBK	Emailing w AHS re NH legal memo on voluntary cessation exception to moonless doctrine.	0.1	
6/28/2024	AHS	Met with JY to discuss subclass cert hearing.	0.1	
6/28/2024	AHS	Edited and circulated notes from hearing on subclass certification.	0.4	
6/28/2024	AHS	Read agenda and materials in advance of weekly co-counsel meeting.	0.2	
6/28/2024	AHS	Attended weekly co-counsel meeting to discuss next steps for discovery and discussed next steps with JY GCG DLE.	1.2	
6/28/2024	AHS	Updated internal case tasks list.	0.2	
6/28/2024	AHS	Edited summer associate's research memo re voluntary cessation exception to mootness.	2.6	
6/28/2024	NKH	Edit voluntary cessation memo.	1.5	
6/28/2024	NKH	Edit voluntary cessation brief.	1.5	
6/28/2024	DLE	Attend and note-take co-counsel meeting re case tasks and firm-only debrief.	1.2	
6/28/2024	DLE	Organize and circulate notes from co-counsel meeting and firm-only debrief.	0.3	
6/29/2024	GCG	Email AS re search for key witness.	0.1	
6/29/2024	JSY	Emails re JA.	0.1	
7/1/2024	GCG	Review and revise 13th set of document requests.	0.1	
7/1/2024	GCG	Email MJ and ER re delays in producing class list.	0.1	
7/1/2024	GCG	Confer and email with JSY re named Plaintiff with health issues.	0.1	
7/1/2024	GCG	Review and respond to Scotts Valley witness.	0.1	
7/1/2024	GCG	Confer with AS and email team re follow up.	0.1	
7/1/2024	JSY	Conf. w/ JA re testimony; conf. w/ GCG re same; draft memo re same; emails re same.	0.5	
7/1/2024	JSY	Emails re discovery issues re class list.	0.1	
7/1/2024	AHS	Emailed with investigator about locating a potential witness.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/1/2024	NKH	Voluntary cessation research check in with Adrienne.	0.3	
7/2/2024	GCG	Review JB emails re 13th RFP and class list.	0.1	
7/2/2024	GCG	Conferences and texts with JSY re same and re discovery.	0.2	
7/2/2024	GCG	Email AS and team re Barchuk deposition defense.	0.1	
7/2/2024	GCG	Emails with MJ and team re order granting depositions and plan for same.	0.1	
7/2/2024	JSY	Emails re transcript.	0.1	
7/2/2024	JSY	Emails re discovery requests.	0.2	
7/2/2024	JSY	Conf. w/ GCG re discovery disputes.	0.2	
7/2/2024	JSY	Conf. w/ GCG re depo review project.	0.1	
7/2/2024	JSY	Emails re depo review project.	0.3	
7/2/2024	JSY	Review discovery order; emails re same.	0.2	
7/2/2024	JSY	Emails re expert depos.	0.1	
7/2/2024	BBK	Reviewing agenda for and notes from 6/28 co-counsel meeting.	0.2	
7/2/2024	BBK	Reviewing AHS email to NH w/ comments/proposed revisions to legal memo on mootness exception for dispositive motion briefing re FSP.	0.1	
7/2/2024	BBK	Reviewing emails w/ opposing counsel re: failure to comply w/ court order re production of transportation class list, re: expert deposition scheduling, and re Ds' failure to respond to RFPs seeking expert docs (and emails w/ co-counsel and RBGG team re same).	0.3	
7/2/2024	BBK	Reviewing outreach from daughter of BD Scotts Valley former resident and emails w/ co-counsel re FU w/ same; reviewing JSY reports re: recent contacts w/ J. Algarme.	0.1	
7/2/2024	BBK	Reviewing emails re drafting/serving RFP Set 13 and emails w/ opposing counsel re: propriety of same.	0.2	
7/2/2024	BBK	Reviewing/responding to DLE questions re barrier list and photograph compliance for motion for partial summary judgment.	0.1	
7/2/2024	BBK	Reviewing M. Johnson email re our experts' availability for deposition and emailing w/ RBGG team re same.	0.1	
7/2/2024	AHS	Reviewed emails with opposing counsel re discovery disputes.	0.3	
7/2/2024	AHS	Emailed with investigator and team about locating a potential witness.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/2/2024	AHS	Followed up with an intake about conditions at Brookdale.	0.4	
7/2/2024	AHS	Identified expert's availability for a deposition and conveyed it to team.	0.2	
7/2/2024	DLE	Compile images of barriers per facility from expert reports for Motion for Summary Judgment.	1.5	
7/2/2024	DLE	Save and circulate filed pleadings.	0.3	
7/3/2024	GCG	Email GW re overall status of case.	0.1	
7/3/2024	GCG	Conferences with JSY re team meeting, Barchuk deposition and motion for summary judgment.	0.3	
7/3/2024	GCG	Email MJ re meet and confer re client list.	0.1	
7/3/2024	JSY	Emails re ED of SR.	0.2	
7/3/2024	JSY	Team meeting.	0.5	
7/3/2024	JSY	Emails and conf. re expert depos.	0.1	
7/3/2024	JSY	Emails and conf. re expert depo schedules.	0.2	
7/3/2024	JSY	Conf. w/ GCG re current projects and case issues.	0.2	
7/3/2024	BBK	Reviewing Court Order Granting Leave to Depose K. Rubin and A. Omole and emails w/ co-counsel re same.	0.2	
7/3/2024	BBK	Reviewing email serving Pls' 14 Set of RFPs and Ds' email objecting to same; reviewing court's minute order on class cert hearing and MJ Beeler order on sealing motion.	0.1	
7/3/2024	BBK	Conferring w/ AHS re status of NH legal memo revisions for dispositive motions.	0.1	
7/3/2024	BBK	Conferring w/ AHS & JSY re locating witness and outreach to same.	0.2	
7/3/2024	BBK	Meeting w/ co-counsel re case priorities.	0.5	
7/3/2024	BBK	Reviewing M. Johnson email to opposing counsel re our experts' availability for depositions and requesting same re Ds' experts; reviewing draft T. Close and M. Johnson emails to Ds re non-compliance w/ court's 4/25 discovery order w/r/t issue registers, class list, and other FSP-related docs.	0.2	
7/3/2024	AHS	Discussed DLE's assignments and work on PRA requests and MSJ draft.	0.3	
7/3/2024	AHS	Emailed with Dr. Barchuk and assistant re deposition availability and scheduling.	0.3	
7/3/2024	AHS	Call with co-counsel to discuss discovery status and plan.	0.5	
7/3/2024	AHS	Call with JY re expert depo.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/3/2024	AHS	Emailed co-counsel re: contacting potential witness.	0.1	
7/3/2024	AHS	Discussed research memo re: mootness and deadline with summer associate.	0.2	
7/3/2024	DLE	Confer with AHS re case tasks and updates.	0.3	
7/3/2024	DLE	Attend and note-take weekly co-counsel meeting.	0.5	
7/3/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.2	
7/5/2024	NKH	Edit memo re voluntary cessation.	1.0	
7/5/2024	NKH	Research/read voluntary cessation case law.	0.6	
7/5/2024	NKH	Reorganize and edit voluntary cessation memo.	1.2	
7/5/2024	NKH	Research voluntary cessation.	1.0	
7/7/2024	GCG	Email MJ and team re defendants' incomplete class list.	0.1	
7/8/2024	GCG	Review emails from MJ and defendants re expert depositions and class list.	0.1	
7/8/2024	JSY	Emails re depo videos.	0.2	
7/8/2024	JSY	Emails re expert depositions.	0.1	
7/8/2024	AHS	Reviewed emails with co-counsel re discovery disputes and emailed to coordinate intake call.	1.2	
7/8/2024	NKH	Review VC caselaw.	0.8	
7/8/2024	NKH	Draft VC memo.	1.0	
7/8/2024	NKH	ADA wheelchair transport research.	0.6	
7/8/2024	NKH	Further research.	0.8	
7/8/2024	NKH	Further Research.	0.5	
7/8/2024	NKH	Edit memo.	0.6	
7/9/2024	GCG	Texts w/ JSY re motion for summary judgment.	0.1	
7/9/2024	JSY	Emails re depo videos.	0.2	
7/9/2024	JSY	Emails and messages re MSJ draft.	0.2	
7/9/2024	JSY	Messages with GCG re MSJ.	0.1	
7/9/2024	JSY	Emails re depo videos.	0.1	
7/9/2024	BBK	Emailing w/ opposing counsel re meeting and conferring over expert deposition timing.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/9/2024	BBK	Emailing w/ co-counsel re outreach to members of certified class identified by Ds as part of rolling court-ordered production.	0.1	
7/9/2024	BBK	Analyzing transcript from 6/27 class cert hearing produced today.	0.1	
7/9/2024	BBK	Emailing w/ co-counsel re Ds' production of FSP-related ESI.	0.1	
7/9/2024	BBK	Reviewing/analyzing Ds' letter to Ps re status of discovery.	0.2	
7/9/2024	BBK	Emailing w/ JSY re status of AHS and DLE projects for motion for partial summary judgment; follow-up w/ AHS re same.	0.1	
7/9/2024	AHS	Inserted citations to facts in the record to second half of draft motion for summary judgment.	2.5	
7/9/2024	AHS	Inserted citations to facts in the record to fact section of draft motion for summary judgment.	2.8	
7/9/2024	KES	Emails with team and court reporting service re video of Algarme and other client depos; review files re same.	0.6	
7/9/2024	NKH	Voluntary cessation research.	0.5	
7/9/2024	NKH	Edit memo.	0.5	
7/9/2024	NKH	Review FSP and FSP comparisons.	0.4	
7/9/2024	NKH	Further research.	0.2	
7/9/2024	NKH	Edit VC memo.	1.0	
7/9/2024	NKH	Reorganizing memo.	0.5	
7/9/2024	DLE	Save and circulate filed pleading.	0.1	
7/10/2024	BBK	Emails w/ co-counsel re production and analysis of FSP-related ESI.	0.2	
7/10/2024	BBK	Emails w/ DLE re preparing photographs of access barriers for motion for partial summary judgment.	0.1	
7/10/2024	BBK	Emails w/ AHS and NH re revised legal memo on voluntary cessation exception to mootness doctrine.	0.1	
7/10/2024	BBK	Reviewing emails w/ OC re depositions of C. Flores and A. Omale and re: contact w/ and production of list of members of certified transportation class, and re: production of data re contract labor.	0.2	
7/10/2024	BBK	Emailing w/ AHS re Barchuk deposition.	0.1	
7/10/2024	BBK	Reviewing/commenting on AHS additions to draft motion for partial summary judgment and emailing w/ AHS re same.	1.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/10/2024	BBK	Emailing update to JSY re status of AHS, NJ and DLE projects for motion for partial summary judgment.	0.1	
7/10/2024	AHS	Reviewed emails with opposing counsel re upcoming depositions.	0.2	
7/10/2024	AHS	Reviewed emails with co-counsel re: documents produced in discovery.	0.2	
7/10/2024	AHS	Emailed with team and Dr. Barchuk re: expert deposition availability.	0.2	
7/10/2024	AHS	Reviewed comments from BBK on draft motion for summary judgment.	0.3	
7/10/2024	AHS	Emailed BBK re: next steps for motion for summary judgment draft.	0.3	
7/10/2024	AHS	Reviewed e-mails with opposing counsel re: discovery disputes.	0.2	
7/10/2024	KES	Organize Algarme depo video.	0.8	
7/10/2024	KES	Confer DE and AS re hearing and case status.	0.2	
7/10/2024	NKH	Mootness case research for standard.	0.5	
7/10/2024	NKH	Research for memo.	0.5	
7/10/2024	NKH	Draft/edit VC memo.	1.0	
7/10/2024	NKH	Redressibility research.	0.4	
7/10/2024	NKH	Cite checking legal standard section.	0.5	
7/10/2024	NKH	Edit VC memo.	1.0	
7/10/2024	NKH	Restructure and edit VC memo.	1.0	
7/10/2024	NKH	Finalize memo.	1.5	
7/11/2024	GCG	Conf w/ JSY re status of summary judgment and plan for team meeting.	0.1	
7/11/2024	JSY	Review video of JA depo.	0.5	
7/11/2024	JSY	Conf. w/ GCG re status.	0.1	
7/11/2024	AHS	Organized meeting re PRA materials.	0.1	
7/11/2024	AHS	Reviewed PRA materials.	0.4	
7/12/2024	GCG	Prepare for and conduct meeting w/ co-counsel re discovery follow up and trial preparation.	1.0	
7/12/2024	GCG	Follow up meeting w/ RBGG team re same and re MSJ.	0.2	
7/12/2024	JSY	Emails re depo videos.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/12/2024	JSY	Emails re class list and communications.	0.1	
7/12/2024	JSY	Emails re class list outreach.	0.2	
7/12/2024	JSY	Team meeting re case tasks and priorities.	0.7	
7/12/2024	JSY	Email courtroom deputy re MSJ hearing date.	0.1	
7/12/2024	AHS	Reviewed agenda and associated documents before co-counsel meeting.	0.5	
7/12/2024	AHS	Attended weekly co-counsel meeting and discussed current and upcoming discovery and motions.	0.9	
7/12/2024	AHS	Attended meeting with JY GCG DLE KS to discuss upcoming and tasks.	0.3	
7/12/2024	AHS	Sent and reviewed emails with team re: follow up from co-counsel meeting.	0.2	
7/12/2024	KES	Participate in team Zoom re discovery issues.	1.0	
7/12/2024	KES	Draft depo subpoena and arrange for service of same; draft NOD re same.	0.7	
7/12/2024	DLE	Attend and note-take weekly meeting with co-counsel and firm-only debrief.	1.2	
7/12/2024	DLE	Finalize and circulate notes from co-counsel meeting and firm only debrief.	0.3	
7/14/2024	GCG	Review RBGG tasks and legal research.	0.2	
7/14/2024	GCG	Email to GW re hearing.	0.1	
7/15/2024	GCG	Meet w/ BBK to plan MSJ.	0.2	
7/15/2024	GCG	Email to MJ re communication to JB re class list outreach.	0.1	
7/15/2024	JSY	Emails re hearing date.	0.1	
7/15/2024	BBK	Reviewing M. Johnson 7/12 letter to Ds responding to letter re status of discovery and M. Johnson - J. Bertino emails re Pls' communications w/ members of certified class.	0.2	
7/15/2024	BBK	Reviewing JSY emails w/ Courtroom Deputy re hearing date for dispositive motions; emails w/ co-counsel re serving amended deposition notice for A. Omole; and emails re outreach to former BD San Ramon Executive Director.	0.1	
7/15/2024	BBK	Reviewing DLE notes from 7/12 co-counsel meeting re case priorities and tasks.	0.2	
7/15/2024	BBK	Reviewing AHS updated case task list.	0.1	
7/15/2024	BBK	Reviewing/responding to DLE email re analysis of access barriers for motion for partial summary judgment.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/15/2024	BBK	Meeting w/ GCG re plan for motion for partial summary judgment.	0.3	
7/15/2024	BBK	Conferring w/ AHS re preparing exhibits to BBK Decl ISO Motion for Partial Summary Judgment.	0.1	
7/15/2024	BBK	Analyzing/revising/commenting on NH draft legal memo re voluntary cessation exception to mootness doctrine.	1.3	
7/15/2024	BBK	Reviewing/revising M. Johnson draft discovery letter brief seeking to enforce Court's 4/25 Discovery Order; emailing w/ co-counsel re same.	0.4	
7/15/2024	BBK	Drafting motion for partial summary judgment.	0.3	
7/15/2024	AHS	Updated and circulated internal master case tasks list.	1.4	
7/15/2024	AHS	Reviewed memo on mootness, and related emails.	0.2	
7/15/2024	KES	Follow up re service of deposition subpoena.	0.2	
7/16/2024	GCG	Conf w/ JSY re MSJ plan.	0.1	
7/16/2024	JSY	Emails re Flores depo.	0.2	
7/16/2024	JSY	Conf. w/ GCG re status.	0.1	
7/16/2024	BBK	Reviewing emails w/ co-counsel re discovery letter brief to enforce 4/25 discovery order, M. Johnson - E. Rutner emails re meeting and conferring re same and re: Omole deposition and Ds' expert depositions.	0.2	
7/16/2024	BBK	Reviewing Ds' letter re: discovery disputes.	0.2	
7/16/2024	BBK	Reviewing draft letter brief to compel responses to Pls' 13th and 14th Sets of RFPs.	0.1	
7/16/2024	KES	Finalize and serve NOD re Omole and review subpoena POS re same.	0.4	
7/16/2024	NKH	Edit memo re voluntary cessation research re same.	1.9	
7/17/2024	GCG	Conf w/ MWB re motion practice.	0.1	
7/17/2024	GCG	Conf w/ JSY and emails to BU re Flores deposition.	0.1	
7/17/2024	JSY	Conf. w/ GCG re expert depos.	0.1	
7/17/2024	JSY	Review expert reports.	1.5	
7/17/2024	BBK	Reviewing emails w/ opposing counsel re: Flores deposition.	0.1	
7/17/2024	BBK	Emailing w/ RBGG team re service of supp Schroyer Expert Report on Ds.	0.1	
7/17/2024	BBK	Conferring w/ NH re meeting on legal memo on voluntary cessation exception to mootness doctrine.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/17/2024	BBK	Reviewing emails from JSY re Flores Expert Report and from AHS re spreadsheet of named Pls' records.	0.1	
7/17/2024	BBK	Researching/drafting motion for partial summary judgment.	2.4	
7/17/2024	AHS	Reviewed e-mails from co-counsel and opposing counsel re M&C and discovery disputes.	0.3	
7/17/2024	AHS	Updated fact citations in motion for summary judgment.	3.8	
7/17/2024	AHS	Identified and recirculated notes from prior meet and confer to cocounsel.	0.3	
7/17/2024	KES	Organize expert report.	0.1	
7/18/2024	GCG	Conf w/ and email to JSY re Flores deposition.	0.3	
7/18/2024	JSY	Attend Flores depo prep and beginning of depo.	3.4	
7/18/2024	JSY	Conf. w/ GCG re Flores depo.	0.2	
7/18/2024	JSY	Emails re ED depo.	0.1	
7/18/2024	BBK	Researching/drafting motion for partial summary judgment.	2.6	
7/18/2024	BBK	Reviewing legal analysis re why ADA regulations survive Loper Bright; emailing w/ RBGG team re same.	0.3	
7/18/2024	BBK	Phone call w/ NH re further revisions to legal memo on voluntary cessation exception to mootness doctrine.	0.4	
7/18/2024	BBK	Reviewing R. Steyer report re call from attorney from A. Omole re planned motion to quash deposition; emailing w/ R. Steyer and M. Johnson re recommended response to same.	0.2	
7/18/2024	BBK	Reviewing emails w/ AHS and KES re named Pls' records.	0.1	
7/18/2024	BBK	Reviewing M. Johnson meet and confer email to Ds re outstanding docs ordered produced by 4/25 Discovery Order in advance of 7/19 meet and confer.	0.1	
7/18/2024	AHS	Updated fact citations in motion for summary judgment.	1.9	
7/18/2024	FGL	(Billing Judgment) Review JSY email re third-party witness and run supplemental conflicts check re same.	0.0	0.2
7/18/2024	KES	Review status of client med records and email AS re same.	0.8	
7/18/2024	KES	Email team with Omole subpoena POS.	0.1	
7/18/2024	NKH	Check in with BBK re memo re voluntary cessation.	0.2	
7/19/2024	GCG	Meet w/ co-counseling team re fact and expert discovery issues and MSJ plan.	0.9	
7/19/2024	GCG	Conf w/ JSY and email to BBK and team re depositions and discovery meet and confer.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/19/2024	JSY	Conf. w/ GCG re status of MSJ.	0.1	
7/19/2024	JSY	Team meeting.	1.0	
7/19/2024	JSY	Emails re communications with class members.	0.1	
7/19/2024	BBK	Reviewing M. Johnson email to co-counsel re immediate case tasks and next steps.	0.1	
7/19/2024	BBK	Meeting w/ co-counsel re immediate case tasks and next steps and RBGG debrief re same.	1.0	
7/19/2024	BBK	Meeting and conferring w/ Ds re expert depositions and discovery disputes.	1.5	
7/19/2024	BBK	Debriefing w/ G. Wallace, M. Johnson, R. Steyer and AHS re meet and confer w/ Ds.	0.6	
7/19/2024	BBK	Emailing w/ RBGG team re research on amending pleadings and conforming to proof at trial.	0.1	
7/19/2024	AHS	Reviewed emails and agenda in advance of co-counsel meeting.	0.5	
7/19/2024	AHS	Weekly co-counsel meeting.	1.0	
7/19/2024	AHS	Emailed with JY and team re: legal research about pleadings.	0.2	
7/19/2024	AHS	Edited notes from co-counsel meeting and updated internal case tasks list.	0.8	
7/19/2024	AHS	Follow up call with BBK and co-counsel to debrief M&C.	0.6	
7/19/2024	AHS	Review documents for MSJ.	0.3	
7/19/2024	AHS	Additional edits to motion for summary judgment fact citations.	0.5	
7/19/2024	AHS	Reviewed letter brief from opposing counsel re: discovery dispute.	0.2	
7/19/2024	KES	Arrange for court reporter for Omole deposition.	0.3	
7/19/2024	KES	Partcipate in Zoom with co-counsel re discovery and depos.	0.9	
7/19/2024	KES	Emails with AS re documents relevant to summary judgment prep and review docs re same.	0.4	
7/22/2024	GCG	Review and analyze Judge Gilliam's decision granting class cert for injunctive relief at 3 facilities.	1.0	
7/22/2024	GCG	Conf w/ JSY and emails to JSY, GW and team re same and re next steps.	0.6	
7/22/2024	GCG	Email to Washington Post and outside experts re decision.	0.2	
7/22/2024	JSY	Conf. w/ GCG re order re certification of subclasses.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/22/2024	JSY	Review order re subclass certification and clarification; multiple emails and messages re same and re follow up.	1.0	
7/22/2024	JSY	Further conf. w/ GCG subclass order.	0.1	
7/22/2024	JSY	LM for JA.	0.1	
7/22/2024	JSY	Emails re JA discovery.	0.2	
7/22/2024	JSY	Review FSP PMK depo; draft memo re same.	2.4	
7/22/2024	BBK	Reviewing Ds' draft letter brief motion to quash deposition subpoena and emails from opposing counsel re: partial supp production of class list and re: Algarme Supp Discovery Responses.	0.2	
7/22/2024	BBK	Conferring w/ RBGG team re Court's Order on Motion for Certification and Ds' Motion for Clarification of Class List and next steps ILO same.	0.2	
7/22/2024	BBK	Analyzing Court's Order on Motion for Certification and Ds' Motion for Clarification of Class Definition.	0.6	
7/22/2024	BBK	Conferring w/ JSY re analyzing 30(b)(6) deposition transcript re Fleet Safety Policy for motion for partial summary judgment.	0.1	
7/22/2024	BBK	Conferring w/ DLE re identifying access barriers where Ds' dispute measurements for motion for partial summary judgment.	0.2	
7/22/2024	BBK	Researching/drafting motion for partial summary judgment.	1.1	
7/22/2024	BBK	Reviewing BU summary of Flores deposition.	0.1	
7/22/2024	BBK	Emailing w/ co-counsel re Court's Order on Class Cert and meeting re same.	0.2	
7/22/2024	BBK	Emailing w/ co-counsel re FU on 7/19 meet and confer.	0.1	
7/22/2024	AHS	Read court's order on subclass cert motion and emailed with team re same.	1.1	
7/22/2024	AHS	Searched for and updated fact citations for legal argument section of motion for summary judgment.	2.5	
7/22/2024	NKH	(Billing Judgment) Read Judge Gilliam's order.	0.0	0.7
7/22/2024	DLE	Update schedule of pre-trial deadlines per change from recent order.	0.6	
7/22/2024	DLE	Save and circulate filed pleading.	0.1	
7/22/2024	DLE	Identify disputed access barriers to include in Motion for Summary judgment; send analysis to BBK.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/23/2024	GCG	Meet w/ SW , BU and RBGG co-counseling team to discuss class cert decision and request for interlocutory appeal.	1.0	
7/23/2024	GCG	Follow up conference w/ JSY and BBK re same and re MSJ.	0.2	
7/23/2024	JSY	Team meeting.	0.8	
7/23/2024	JSY	Conf. w/ GCG re interlocutory appeal certification.	0.2	
7/23/2024	JSY	Conf. w/ BBK re class list, JA discovery, FSP deposition.	0.3	
7/23/2024	JSY	Conf. w/ JA.	0.2	
7/23/2024	JSY	Emails re discovery re JA.	0.3	
7/23/2024	JSY	Research re timing for motion to certify issue for interlocutory appeal.	0.2	
7/23/2024	JSY	Prepare JA supp ROG responses.	0.1	
7/23/2024	JSY	Conf. w/ BBK re issues with Brookhurst barrier list.	0.1	
7/23/2024	JSY	Conf. w/ GCG and BBK re issues with Brookhurst class.	0.2	
7/23/2024	JSY	Prepare JA discovery responses; multiple emails re same; research re same.	1.4	
7/23/2024	BBK	Reviewing M. Johnson emails w/ OC re expert depositions and motion to quash deposition subpoena; emails w/ co-counsel re analysis of Ds' supp prod of docs relating to service alignment.	0.2	
7/23/2024	BBK	Reviewing/revising M. Johnson draft letter brief seeking supp ROG responses re access barriers and response to RFPs seeking expert materials.	0.6	
7/23/2024	BBK	Meeting w/ co-counsel re class certification order and next steps ILO same.	0.5	
7/23/2024	BBK	Reviewing JSY emails w/ OC re supplementing Algarme discovery responses and Ds' demand for her medical records.	0.2	
7/23/2024	BBK	Strategy meeting w/ JSY re addressing Ds' demand for docs from Algarme and re: seeking production of identities of members of certified facility-specific classes not already produced to us.	0.3	
7/23/2024	BBK	Reviewing AHS research re timing for filing motion seeking certification of question for appeal to Judge Gilliam and for petitioning 9th Cir for permission to appeal under 28 USC 1292(b).	0.1	
7/23/2024	BBK	Reviewing M. Johnson's revised letter brief to compel compliance w/ 4/25 discovery order.	0.2	
7/23/2024	BBK	Meeting w/ GCG and JSY re case strategy.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/23/2024	BBK	Reviewing JSY- R. Steyer emails re outreach to current Brookhurst residents for potential additional class reps.	0.1	
7/23/2024	BBK	Reviewing/responding to JSY's proposed plan re supplemental responses to Algarme ROGs and RFPs.	0.2	
7/23/2024	BBK	Phone call w/ JSY re scope of access expert 2024 inspection of Brookhurst.	0.1	
7/23/2024	AHS	Read emails between co-counsel and opposing counsel and notes from meet and confer.	0.4	
7/23/2024	AHS	Meeting with GCG JY BBK DLE and co-counsel.	0.8	
7/23/2024	AHS	Researched 28 USC 1292(b) and circulated findings.	1.2	
7/23/2024	AHS	Prepared letters to named plaintiffs updating them on subclass cert order.	1.4	
7/23/2024	AHS	Researched use of depositions at trial.	0.5	
7/23/2024	NKH	(Billing Judgment) Edit memo re voluntary cessation.	0.0	1.6
7/23/2024	DLE	Attend and note-take meeting with co-counsel re recent order.	0.8	
7/23/2024	DLE	Finalize and circulate notes from recent co-counsel meeting.	0.3	
7/24/2024	GCG	Conf w/ and emails to JSY re call w/ class representative JA.	0.3	
7/24/2024	GCG	Conf w/ JSY and emails to MJ and JSY re Mastin and Waters declarations for MSJ.	0.2	
7/24/2024	JSY	Conf. w/ GCG re barrier lists, MSJ, and ROG responses.	0.2	
7/24/2024	JSY	Revise JA supplemental ROG responses; research re same.	0.9	
7/24/2024	JSY	Conf with JA re Supp ROG responses.	1.2	
7/24/2024	JSY	Conf w/ GCG re call with JA.	0.2	
7/24/2024	JSY	Emails re MSJ.	0.1	
7/24/2024	BBK	Reviewing JSY-OC emails re Algarme supp disc responses; emails w/ co-counsel and RBGG team re deposition schedule and scope of access barrier report for Brookhurst; and JSY-AHS comm'ns re Algarme records for supp Rog responses.	0.2	
7/24/2024	BBK	Reviewing E. Rutner - M. Johnson emails re Pls' two joint letter briefs; conferring w/ co-counsel re same.	0.2	
7/24/2024	BBK	Reviewing M. Johnson's draft Pls' portion of letter brief motion to quash depo subpoena.	0.1	
7/24/2024	BBK	Emailing w/ AHS re locating additional evidence for motion for partial summary judgment.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/24/2024	BBK	Researching/drafting motion for partial summary judgment.	5.0	
7/24/2024	AHS	Reviewed emails from cocounsel and opposing counsel and updated internal tasks list.	0.4	
7/24/2024	AHS	Identified documents regarding plaintiff Algarme and sent to JY.	0.8	
7/24/2024	DLE	Locate and circulate docs re named plaintiffs.	0.2	
7/25/2024	GCG	Emails w/ GW, MJ and JSY re preparation for upcoming hearings.	0.1	
7/25/2024	GCG	Conf w/ JSY re conversation w/ named plaintiff JA and potential Brookhurst witnesses.	0.1	
7/25/2024	GCG	Conf w/ and email to BBK re draft motion for summary judgment.	0.1	
7/25/2024	GCG	Review AS report on deadline for motion to certify interlocutory appeal.	0.1	
7/25/2024	GCG	Review and revise letters to named plaintiffs re class cert order.	0.1	
7/25/2024	JSY	Conf. w/ JA re ROG responses.	0.6	
7/25/2024	JSY	Conf. w/ BBK re MSJ issues.	0.2	
7/25/2024	JSY	Conf. w/ GCG re JA.	0.2	
7/25/2024	JSY	Emails re CMC.	0.1	
7/25/2024	JSY	Edit letters to named plaintiffs; emails re same.	0.5	
7/25/2024	JSY	Emails re identification of witnesses.	0.2	
7/25/2024	JSY	Summarize FSP PMK depo; emails re same.	0.7	
7/25/2024	JSY	Edit JA ROG responses.	1.6	
7/25/2024	JSY	Emails re correspondence with potential witness.	0.1	
7/25/2024	BBK	Reviewing Ds' certification re production IRT 4/25 discovery order; emails w/ co-counsel re upcoming CMC; AHS draft letters to plaintiffs re class cert order.	0.2	
7/25/2024	BBK	Emailing w/ JSY and co-counsel re preparing narrower Mastin/Waters barrier lists for MPSJ.	0.1	
7/25/2024	BBK	Conferring w/ JSY and KES re locating additional class reps for Brookhurst subclass.	0.2	
7/25/2024	BBK	Meeting w/ JSY re MPSJ and class reps.	0.1	
7/25/2024	BBK	Meeting w/ GCG re MPSJ; emailing w/ GCG/JSY/GW re same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 960

SERVICES

Date	Person	Description of Services	Hours	Discount
7/25/2024	BBK	Phone call w/ JSY re analysis of 30(b)(6) depo transcript re FSP and re: Brookhurst access barriers.	0.2	
7/25/2024	BBK	Emailing w/ AHS re additional evidence for MPSJ.	0.1	
7/25/2024	BBK	Researching and drafting motion for partial summary judgment.	4.5	
7/25/2024	AHS	Reviewed emails with co-counsel and opposing counsel re: discovery disputes.	0.2	
7/25/2024	AHS	Emailed GCG and JY re letters to named plaintiffs.	0.3	
7/25/2024	AHS	Edited letters to named plaintiffs and sent to GCG.	0.2	
7/25/2024	AHS	Emailed with BBK re MSJ.	0.1	
7/25/2024	AHS	Emails re discovery issues.	0.2	
7/25/2024	KES	Online research re potential new plaintiff and review class lists re same.	1.2	
7/25/2024	NKH	(Billing Judgment) Edit/add to VC memo.	0.0	1.0
7/25/2024	NKH	Edit VC memo.	1.5	
7/25/2024	DLE	Save and circulate certification of discovery.	0.1	
7/26/2024	GCG	Meet w/ co-counseling team re expert deposition plan and class members communications.	1.1	
7/26/2024	GCG	Conf w/ RBGG team re MSJ.	0.2	
7/26/2024	GCG	Emails to JSY, RS and team re potential new plaintiff at Brookhurst.	0.2	
7/26/2024	GCG	Emails to AS and team re letters to named plaintiffs re Court order.	0.1	
7/26/2024	GCG	Emails to GW and team re Dr. Kennedy invoices.	0.1	
7/26/2024	JSY	Team meeting, including meeting with RBGG team.	1.5	
7/26/2024	JSY	Update ROG responses for JA; multiple emails re same.	0.6	
7/26/2024	JSY	Emails re jury consultant.	0.1	
7/26/2024	JSY	Emails re call with Brookhurst witness.	0.1	
7/26/2024	JSY	Edit memo re FSP depo; emails re same.	1.0	
7/26/2024	JSY	Emails and calls re witness outreach.	0.4	
7/26/2024	JSY	Messages re named plaintiffs' resident units.	0.2	
7/26/2024	JSY	Emails re letters to clients.	0.1	
7/26/2024	SJR	Email from GG re status.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 961

SERVICES

Date	Person	Description of Services	Hours	Discount
7/26/2024	BBK	Conferring w/ JSY re analysis of 30(b)(6) transcript re FSP.	0.1	
7/26/2024	BBK	Meeting w/ co-counsel re case tasks and priorities and RBGG debrief re same.	1.4	
7/26/2024	BBK	Reviewing M. Johnson emails to opposing counsel confirming expert depo dates, requesting production of class lists for new certified classes, and re: insufficiency of Ds' certification re supp doc production; reviewing emails from opposing counsel re production of service alignment source code and other supp docs.	0.1	
7/26/2024	BBK	Comm'ns w/ R. Steyer and JSY re PCs with POAs of current Brookdale Brookhurst residents who are witnesses and potential class reps.	0.2	
7/26/2024	BBK	Researching/drafting motion for partial summary judgment.	4.9	
7/26/2024	AHS	Discussed case tasks and status with DLE.	0.1	
7/26/2024	AHS	Reviewed GCG edits in letters to named plaintiffs.	0.2	
7/26/2024	AHS	Revised letters to named plaintiffs.	1.9	
7/26/2024	AHS	Attended weekly meeting with GCG JY BBK DLE KS and co-counsel to discuss upcomin CMC and other issues.	1.5	
7/26/2024	AHS	Reviewed e-mails with co-counsel re: discovery and contact with class members.	0.2	
7/26/2024	AHS	Updated internal case tasks list.	0.1	
7/26/2024	AHS	Corresponded with expert Dr. Barchuk.	0.1	
7/26/2024	AHS	Reviewed expert materials for Rule 26 compliance.	0.2	
7/26/2024	KES	Team Zoom re depos, discovery, MSJ, CMC.	1.5	
7/26/2024	KES	Review emails re potential new plaintiffs.	0.1	
7/26/2024	NKH	Edit VC memo.	1.0	
7/26/2024	DLE	Attend and note-take weekly meeting with co-counsel.	1.5	
7/26/2024	DLE	Organize and circulate notes from weekly co-counsel meeting.	0.3	
7/27/2024	BBK	Researching/drafting motion for partial summary judgment.	3.3	
7/28/2024	BBK	Reviewing/analyzing revised legal memo re voluntary exception to mootness by NH.	0.2	
7/28/2024	BBK	Researching/drafting motion for partial summary judgment.	2.6	
7/29/2024	GCG	Email to DY and AS re preparation for oral argument on motion for sanctions.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/29/2024	JSY	Conf. w/ JA re ROG responses.	0.2	
7/29/2024	JSY	Emails re supplementation of discovery re JA; edit ROG response.	0.5	
7/29/2024	JSY	Edits to barrier lists for MSJ.	0.4	
7/29/2024	JSY	Finalize supplemental ROG responses.	0.3	
7/29/2024	JSY	Work on barrier lists for MSJ; messages re same.	1.2	
7/29/2024	BBK	Reviewing JSY-opposing counsel comm'ns re Algarme's supp discovery responses; conferring w/ JSY and team re finalizing/serving same.	0.2	
7/29/2024	BBK	Conferring w/ JSY and AHS re preparing narrowed access barrier lists for motion for partial summary judgment and identifying/pulling additional evidence and citing same in MPSJ.	0.3	
7/29/2024	BBK	Drafting/revising motion for partial summary judgment.	10.5	
7/29/2024	AHS	Reviewed emails with co-counsel re: discovery disputes and subclass cert order.	0.3	
7/29/2024	AHS	Reviewed BBK comments on fact citations.	0.4	
7/29/2024	AHS	Searched Relativity and updated fact citations re in draft motion for summary judgment.	2.4	
7/29/2024	AHS	Conducted initial research into arbitration clause opt outs.	0.4	
7/29/2024	KES	Finalize and serve Algarme discovery responses.	0.4	
7/29/2024	KES	Review and gather Quinlan and other client docs on Relativity and DMS; emails with AS re same.	1.5	
7/30/2024	GCG	Prepare for oral argument on sanctions motion.	0.1	
7/30/2024	GCG	Conferences with MJ and JSY re same.	0.1	
7/30/2024	GCG	Conference with JSY re potential new plaintiff.	0.1	
7/30/2024	GCG	Prepare for Case Management Conference.	0.1	
7/30/2024	GCG	Email GW-MJ-JSY re same.	0.1	
7/30/2024	GCG	Conference with BBK re MSJ draft.	0.1	
7/30/2024	GCG	Conference with AS re oral argument preparation and MSJ draft.	0.1	
7/30/2024	JSY	Conf. and emails re potential plaintiff.	0.3	
7/30/2024	JSY	Conf. 2x w/ BBK re issues re MSJ.	0.3	
7/30/2024	JSY	Edit barrier lists; multiple emails and conf. re same.	1.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/30/2024	JSY	Conf. and emails re potential plaintiff.	0.2	
7/30/2024	JSY	Emails re potential plaintiff.	0.1	
7/30/2024	BBK	Reviewing emails from opposing counsel re: adequacy of Ds' certification re supp doc prod pursuant to 4/25 Discovery Order and re: Pls' request for production of class list for three certified facility-specific classes; reviewing emails w/ RBGG team re prep for 8/8 hearing on Ds' motion for sanctions.	0.1	
7/30/2024	BBK	Meeting w/ JSY re preparing supporting declarations and exhibits for motion for partial summary judgment.	0.2	
7/30/2024	BBK	Emailing w/ AHS re identifying exhibits for BBK Decl ISO motion for partial summary judgment and preparing record cites to same for brief.	0.2	
7/30/2024	BBK	Emailing w/ JSY and WP re revising Mastin and Waters access barrier lists for motion for partial summary judgment; conferring w/ JSY re same.	0.3	
7/30/2024	BBK	Meeting w/ GCG re plan for preparing/filing motion for partial summary judgment and supporting papers.	0.2	
7/30/2024	BBK	Reviewing Ds' portions of discovery letter briefs re: Ds' failure to comply w/ 4/25 Discovery Order and refusal to respond to written expert discovery.	0.2	
7/30/2024	BBK	Planning/preparing tasklist and filing checklist for motion for partial summary judgment.	0.7	
7/30/2024	BBK	Analyzing/commenting on R. Steyer intake notes from call w/ prospective class rep from Brookhurst; emailing w/ JSY and R. Steyer re same.	0.3	
7/30/2024	BBK	Emailing w/ RBGG team re fact investigation into prospective Brookhurst class rep; emailing w/ JSY and R. Steyer re next steps to retain her.	0.2	
7/30/2024	AHS	Reviewed emails with co-counsel and updated internal case tasks list.	0.3	
7/30/2024	AHS	Met with GCG to discuss hearing on sanctions motion and Brookdale research assignments.	0.2	
7/30/2024	AHS	Found and inserted fact citations into new draft motion for summary judgment.	0.2	
7/30/2024	AHS	Reviewed notes with co-counsel re named plaintiffs.	0.2	
7/30/2024	LHW	Conduct Westlaw PeopleMap searches re potential witnesses; review Orange County Superior Court records.	1.3	
7/30/2024	DLE	Search for named plaintiff assessment summary and medical records in document database per AHS.	1.0	
7/30/2024	DLE	Confer with co-counsel re missing named plaintiff documents.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/30/2024	DLE	Compile pleadings re motion for sanctions per GCG's instruction.	1.1	
7/31/2024	GCG	Prepare for and conduct conference with GW, MH, and JSY to prepare for CMC.	0.9	
7/31/2024	GCG	Review GW list of complaint paragraphs that may need amendment.	0.2	
7/31/2024	GCG	Conference with JSY re motion for summary judgment.	0.2	
7/31/2024	GCG	Email JSY-BBK-team re complaint allegations and expert discovery.	0.1	
7/31/2024	JSY	Emails re expert depos.	0.1	
7/31/2024	JSY	Emails re call with new potential plaintiff.	0.1	
7/31/2024	JSY	Revise barrier lists for MSJ; emails re same.	0.4	
7/31/2024	JSY	Meeting with GW, MTJ, GCG re prep for CMC; emails re same.	0.9	
7/31/2024	JSY	Emails re amendment of complaint.	0.1	
7/31/2024	BBK	Reviewing emails from opposing counsel re: dispute over production of Pls' counsel's letters to putative class members and re: setting expert depositions; conferring w/ RBGG team re same.	0.1	
7/31/2024	BBK	Emailing JSY and GCG re task list and filing checklist for motion for partial summary judgment.	0.1	
7/31/2024	BBK	Emails w/ JSY and WP re narrowed barrier lists for Mastin and Waters Decls ISO MPSJ.	0.1	
7/31/2024	BBK	Reviewing/responding to R. Steyer query re RFPs served by Ds to date.	0.1	
7/31/2024	BBK	Reviewing/revising M. Johnson draft reply portion of letter brief re expert discovery; emailing w/ team re same.	1.0	
7/31/2024	BBK	Conferring w/ JSY re outreach to prospective client and class rep at Brookhurst.	0.1	
7/31/2024	BBK	Conferring w/ JSY & AHS re CMC.	0.2	
7/31/2024	BBK	Research re recent class cert order; updating MPSJ to include same and updating RBGG team re same.	0.3	
7/31/2024	BBK	Reviewing reply portion of Motion to Quash Omole Deposition Subpoena letter brief.	0.2	
7/31/2024	AHS	Searched for missing docs re named plaintiff in defendants' production and corresponded with DLE and cocounsel re same.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/31/2024	AHS	Found and inserted fact citations in new draft motion for summary judgment.	2.9	
7/31/2024	AHS	Clarified dates from HSG's standing orders and emailed team re: dates and case management conference.	0.4	
8/1/2024	GCG	Conf w/ JY and emails to GW re allegations of FAC and preparation for CMC.	0.2	
8/1/2024	GCG	Participate in CMC.	0.9	
8/1/2024	GCG	Follow up strategy call w/ GW, MJ, JSY and AS to discuss tasks from Court at CMC and trial planning.	1.2	
8/1/2024	GCG	Conf w/ MWB, EG. LAE and JSY and emails to team re MJ to propose for settlement conference.	0.5	
8/1/2024	GCG	Emails w/ GW and partners re settlement issues.	0.2	
8/1/2024	GCG	Conf w/ and emails to GW re staffing experts and settlement issues.	0.3	
8/1/2024	GCG	Conf w/ JSY re Barchuk deposition defense.	0.2	
8/1/2024	JSY	Attend CMC.	0.5	
8/1/2024	JSY	Team meeting after CMC.	1.1	
8/1/2024	JSY	Prep for CMC; conf. w/ GCG re same.	0.2	
8/1/2024	JSY	Emails and conf. w/ partners re MJ for MSC.	0.2	
8/1/2024	JSY	Emails re amendment of complaint.	0.2	
8/1/2024	JSY	Draft email to Defs re various topics for M+C after CMC.	0.6	
8/1/2024	JSY	Conf. w/ GCG re settlement issues.	0.1	
8/1/2024	LAE	Conf with JSY re potential settlement MJs.	0.1	
8/1/2024	SJR	Emails re MJs for MSC.	0.2	
8/1/2024	BBK	Reviewing GCG-JSY emails re amending complaint to conform allegations to proof; emails w/ opposing counsel re motion for court reporter for 8/1 CMC.	0.2	
8/1/2024	BBK	Reviewing letter brief seeking to enforce 4/25 discovery order emailed to opposing counsel and MJohnson and E Rutner emails re same.	0.3	
8/1/2024	BBK	Reviewing M. Johnson - E. Rutner emails re further meet and confers on letter brief re expert discovery.	0.2	
8/1/2024	BBK	Analyzing NH legal memo re voluntary cessation exception to mootness and cases cited therein.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/1/2024	BBK	Reviewing M. Johnson notes from CMC and reviewing/responding to AHS notes from debrief w/ co-counsel.	0.2	
8/1/2024	AHS	Reviewed emails from opposing counsel re: discovery dispute regarding source code.	0.2	
8/1/2024	AHS	Corresponded with team re: CMC.	0.2	
8/1/2024	AHS	Attended case management conference.	0.8	
8/1/2024	AHS	Consolidated and circulated notes from case management conference and debrief conversation.	0.4	
8/1/2024	AHS	Met with GCG JY and co-counsel to debrief after case management conference and discuss next steps.	1.1	
8/1/2024	AHS	Updated internal case tasks list.	0.4	
8/1/2024	AHS	Reviewed emails with co-counsel and opposing counsel re: next steps after case management conference.	0.3	
8/1/2024	DLE	Save filed pleadings.	0.2	
8/2/2024	JSY	Emails re barrier lists.	0.2	
8/2/2024	JSY	Emails re barrier lists for MSJ.	0.1	
8/2/2024	JSY	Emails re transcript of CMC.	0.1	
8/2/2024	JSY	Emails re meet and confer.	0.1	
8/2/2024	BBK	Reviewing M Johnson email to Ds w/ Pls' legal position re Ds' demand for production of letters from Pls' counsel to putative class members as protected work product.	0.1	
8/2/2024	BBK	Reviewing M Johnson email to Ds re Pls' proposals on issues Judge Gilliam asked the parties to reach agreements on at 8/1 CMC.	0.1	
8/2/2024	BBK	Reviewing emails w/ co-counsel re Ds' supp doc production and production of class list for Wheelchair and Scooter Users subclass; M. Johnson proposed compromise re production of supp docs ordered by 4/25 Order and proposed stipulation re: briefing disputes on same; emails re supp expert disclosures; and Court's Minute Order re 8/1 CMC.	0.2	
8/4/2024	GCG	Review court order after hearing.	0.1	
8/5/2024	GCG	Conf w/ JSY re MSJ and emails to GW and ER re dispute.	0.2	
8/5/2024	GCG	Review JSY email and court order re AO deposition.	0.1	
8/5/2024	JSY	Conf. w/ BBK re CMC and MSJ.	0.2	
8/5/2024	JSY	Conf. w/ GCG re CMC and MSJ.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 967

SERVICES

Date	Person	Description of Services	Hours	Discount
8/5/2024	JSY	Conf. w/ BBK two times re MSJ and issues with bifurcation of trial and stipulation.	0.5	
8/5/2024	JSY	Emails re additional witnesses.	0.1	
8/5/2024	JSY	Emails re Brookhurst report.	0.1	
8/5/2024	JSY	Emails re bifurcation of staffing issues and meet and confer.	0.3	
8/5/2024	JSY	Conf. w/ GCG re MSJ.	0.1	
8/5/2024	JSY	Emails re order re depo.	0.1	
8/5/2024	BBK	Analyzing Pls' response to Ds argument in US v. GA that Loper Bright casts doubt on ADA implementing regulations for use in dispositive motion briefing.	0.3	
8/5/2024	BBK	Conferring w/ CG re creating BBK Decl and Proposed Order for Motion for Partial Summary Judgment and updating master caption.	0.2	
8/5/2024	BBK	Reviewing JSY emails w/ co-counsel re status of negotiations w/ Ds over CMC topics, comm'ns w/ potential client and class rep for Brookhurst access barrier subclass, and comments on draft MPSJ; reviewing emails w/ opposing counsel re Pls' proposal to stay expert discovery and disclosures relating to staffing claims and re: discovery dispute over supp doc production per 4/25 Disc Order.	0.4	
8/5/2024	BBK	Phone call w/ JSY re strategy for meet and confer w/ Ds over CMC topics and plan for MPSJ.	0.2	
8/5/2024	BBK	Drafting/sending email to G. Wallace re considerations for expert declarations for MPSJ.	0.5	
8/5/2024	BBK	Meeting w/ JSY re strategy for meet and confer over CMC topics.	0.2	
8/5/2024	BBK	Reviewing Court's Order denying motion to quash deposition subpoena.	0.1	
8/5/2024	AHS	Reviewed e-mails with co-counsel re motion for summary judgment and discovery status.	0.5	
8/5/2024	DLE	Save and circulate filed pleadings.	0.6	
8/6/2024	GCG	Confs w/ JSY re meet and confer w/ defendants re bifurcating trial.	0.2	
8/6/2024	JSY	Emails re filing stip; finalize same.	0.2	
8/6/2024	JSY	Conf. w/ GCG re severance or bifurcation of claims.	0.2	
8/6/2024	JSY	Emails re barrier lists.	0.1	
8/6/2024	BBK	Reviewing emails w/ opposing counsel re supp doc productions from Mastin and Waters.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/6/2024	BBK	Conferring w/ AHS re preparing exhibits for BBK Decl ISO MPSJ and record citations for same.	0.3	
8/6/2024	BBK	Conferring w/ AHS re revisions to legal memo on voluntary cessation exception to mootness.	0.1	
8/6/2024	BBK	Analyzing Brookdale's written responses and positions re Pls' proposals re topics Judge Gilliam required the parties to discuss at CMC.	0.3	
8/6/2024	BBK	Emailing w/ RBGG team/co-counsel re postponement of meet and confer w/ Ds re CMC topics.	0.1	
8/6/2024	BBK	Factual research re Ds' proposed MJ for settlement conference and reporting on same to GCG/JSY.	0.3	
8/6/2024	BBK	Reviewing emails w/ opposing counsel re revisions to Pls' draft Stip re EOT to file discovery motions and emails w/ co-counsel and JSY re finalizing/filing same.	0.2	
8/6/2024	AHS	Reviewed status of fact citations in draft mot for summary judgment and sent BBK update.	0.5	
8/6/2024	AHS	Edited draft motion for summary judgment by inserting fact citations.	2.8	
8/7/2024	GCG	Conf w/ JSY and email to JSY and BBK re bifurcation stipulation and expert discovery.	0.2	
8/7/2024	GCG	Email to GW re D.Cross deposition.	0.1	
8/7/2024	JSY	Emails re meet and confer.	0.1	
8/7/2024	JSY	Conf. w/ BBK re meet and confer; emails re same.	0.3	
8/7/2024	BBK	Reviewing emails w/ opposing counsel re discovery motions and expert depositions and re supp prod of docs relating to service alignment benchmarks formula and w/ co-counsel re same; reviewing Court Order granting Stipulation for EOT to file discovery motions.	0.2	
8/7/2024	BBK	Emailing w/ co-counsel re preparing updated list of all access barriers at issue for trial.	0.1	
8/7/2024	BBK	Conferring w/ JSY re strategy for meet and confer w/ Ds re CMC topics.	0.1	
8/7/2024	BBK	Emailing w/ G. Wallace and M. Johnson re strategy for meet and confer w/ Ds re CMC topics.	0.2	
8/7/2024	BBK	Meeting w/ G. Wallace and M. Johnson re strategy for meet and confer w/ Ds re CMC topics.	0.4	
8/7/2024	BBK	Prep for meet and confer w/ Ds re CMC topics.	0.2	
8/7/2024	BBK	Meeting and conferring w/ Ds re CMC topics.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 969

SERVICES

Date	Person	Description of Services	Hours	Discount
8/7/2024	BBK	Debriefing w/ G. Wallace, M. Johnson and T. Close re M&C w/ Ds re CMC topics.	0.2	
8/7/2024	BBK	Emailing w/ co-counsel and RBGG team re next steps after M&C w/ Ds re CMC topics; meeting w/ JSY re same.	0.2	
8/7/2024	BBK	Researching/drafting Stipulation & Proposed Order re CMC Topics.	2.8	
8/7/2024	BBK	Conferring w/ G. Wallace and JSY re revisions to Stipulation & Proposed Order re CMC Topics.	0.3	
8/7/2024	BBK	Reviewing Pls' Admin Motion to Extend Discovery Motion Deadline; conferring w/ JSY/GCG re same.	0.2	
8/8/2024	GCG	Conf w/ JSY re emails to team re bifurcation stipulation.	0.2	
8/8/2024	GCG	Review same.	0.1	
8/8/2024	GCG	Emails w/ JSY and BBK re motion to decertify.	0.2	
8/8/2024	JSY	Conf. w/ GCG re admin motion to extend deadline to file discovery motions; emails re same.	0.1	
8/8/2024	JSY	Emails re stip re bifurcation and other issues.	0.1	
8/8/2024	JSY	Emails re amended Brookhurst barrier list.	0.2	
8/8/2024	JSY	Emails re amended barrier list.	0.2	
8/8/2024	JSY	Emails re stipulation.	0.2	
8/8/2024	JSY	Review decert motion; multiple emails re same.	0.3	
8/8/2024	JSY	Emails re MSJ.	0.1	
8/8/2024	BBK	Further revisions to Stipulation re CMC Topics and emailing w/ co-counsel re same.	0.4	
8/8/2024	BBK	Emailing w/ JSY re timing of amendment to Mastin Expert Report.	0.1	
8/8/2024	BBK	Emailing w/ RBGG team re Pls' Admin Motion to Further Extend Disc Motion Deadline.	0.1	
8/8/2024	BBK	Emailing w/ AHS re fact/record cites and IDing exhibits for motion for partial summary judgment.	0.2	
8/8/2024	BBK	Emailing w/ JSY and co-counsel re Stipulation re CMC Topics.	0.3	
8/8/2024	BBK	Reviewing AHS fact/record cites and incorporating same into draft motion for partial summary judgment.	1.5	
8/8/2024	BBK	Emailing w/ co-counsel and opposing counsel re issues emailing draft Stipulation.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 970

SERVICES

Date	Person	Description of Services	Hours	Discount
8/8/2024	BBK	Emailing w/ AHS re preparing motion for partial summary judgment.	0.2	
8/8/2024	BBK	Reviewing/commenting on Ds' proposed revisions to Stipulation re CMC Topics; conferring w/ co-counsel and JSY re same.	0.3	
8/8/2024	BBK	Conferring w/ JSY and co-counsel re finalizing and serving amendment to Mastin Expert Report.	0.2	
8/8/2024	BBK	Reviewing emails re finalizing/filing Stipulation re CMC Topics; Ds' supp prod of files related to benchmarks formula; and expert depositions.	0.1	
8/8/2024	BBK	Reviewing Ds' Motion to Decertify Access Barriers Subclasses and drafting/sending initial analysis re responding to same to RBGG team and co-counsel.	0.6	
8/8/2024	BBK	Emailing w/ DE re legal research on cases where courts granted partial summary judgment to Pls in ADA cases.	0.1	
8/8/2024	BBK	Conferring w/ G. Wallace re draft motion for partial summary judgment.	0.2	
8/8/2024	BBK	Analyzing Tracy Barriers List and emailing recommendations re: potential visual impairment barriers to include in motion for partial summary judgment.	0.5	
8/8/2024	BBK	Emailing w/ RBGG team re same.	0.1	
8/8/2024	AHS	Reviewed e-mails with co-counsel re stipulations and letter briefs.	0.3	
8/8/2024	AHS	Emailed with BBK re motion for summary judgment next steps for draft.	0.2	
8/8/2024	DLE	Save and circulate filed pleadings.	0.3	
8/9/2024	GCG	Participate in meeting w/ co-counsel re discovery issues, expert depositions and trial preparations.	1.1	
8/9/2024	GCG	Follow up meeting w/ RBGG team re motion for summary judgment work.	0.2	
8/9/2024	JSY	Conf. w/ GCG re decertification motion.	0.2	
8/9/2024	JSY	Team meeting.	1.2	
8/9/2024	JSY	Emails re MSJ.	0.1	
8/9/2024	BBK	Conferring w/ DLE re motion to decertify response and reply deadlines and hearing.	0.1	
8/9/2024	BBK	Revising tasklist and filing checklist for motion for partial summary judgment; circulating to RBGG team.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 971

SERVICES

Date	Person	Description of Services	Hours	Discount
8/9/2024	BBK	Reviewing Order Granting Stipulation re CMC Topics and emailing w/ RBGG team and co-counsel re same.	0.2	
8/9/2024	BBK	Conferring w/ co-counsel re Ds' method of identifying FSP class members.	0.3	
8/9/2024	BBK	Reviewing/responding to G. Wallace queries re threshold access barriers in MPSJ.	0.4	
8/9/2024	BBK	Meeting w/ co-counsel re case priorities and tasks; RBGG team debrief after same.	1.2	
8/9/2024	BBK	Email w/ RBGG team re narrowed access barrier lists for MPSJ.	0.1	
8/9/2024	BBK	Revising draft MPSJ to incorporate Algarme resident room barriers and draft legal argument for Tracy visual barriers.	1.5	
8/9/2024	BBK	Reviewing emails w/ opposing counsel re Mastin expert deposition; M. Johnson email to G. Waters & J. Mastin re declarations ISO MPSJ; and Court's Order referring case to MJ Spero for settlement conference.	0.2	
8/9/2024	AHS	Attended weekly co-counsel meeting with GCG JY BBK DLE.	1.2	
8/9/2024	AHS	Discussed Brookdale tasks including Defs' motion to decertify with DLE.	0.1	
8/9/2024	DLE	Save filed pleadings.	0.3	
8/9/2024	DLE	Schedule and circulate new deadlines for upcoming motions per recent order.	0.6	
8/9/2024	DLE	Meeting with AHS to discuss case developments and upcoming tasks.	0.1	
8/9/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.2	
8/9/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.5	
8/12/2024	GCG	Email to JSY re zoom conference w/ MJ Spero.	0.1	
8/12/2024	JSY	Emails re MSJ.	0.2	
8/12/2024	JSY	Emails re depos.	0.1	
8/12/2024	JSY	Emails re MSJ.	0.1	
8/12/2024	JSY	Emails re settlement conference.	0.1	
8/12/2024	BBK	Reviewing M. Johnson proposed draft emails to opposing counsel re Omole Deposition, improper late production of contract labor invoices, supplementation of Rog responses re access barriers, and expert deposition schedule and comm'ns w/ co-counsel re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/12/2024	BBK	Reviewing M. Johnson-Opposing Counsel emails re expert deposition schedule; Court Order re pre-settlement conference w/ MJ Spero.	0.1	
8/12/2024	BBK	Analyzing/incorporating G. Wallace and M. Johnson edits and comments on draft motion for partial summary judgment.	3.5	
8/12/2024	BBK	Emailing w/ co-counsel re tolerances for access barriers included in motion for partial summary judgment.	0.3	
8/12/2024	BBK	Emailing w/ RBGG team re plan for completing legal and factual research and preparing supporting pleadings for MPSJ and analyzing rebuttal expert reports to determine additional argument and facts needed for same.	0.5	
8/12/2024	BBK	Reviewing/commenting on AHS updated case task list.	0.2	
8/12/2024	BBK	Phone meeting w/ AHS re tasks for motion for partial summary judgment and supporting pleadings.	0.8	
8/12/2024	BBK	Emails w AHS & JSY re legal research for MPSJ.	0.1	
8/12/2024	AHS	Reviewed emails with co-counsel re: status of discovery and motion for summary judgment.	0.5	
8/12/2024	AHS	Updated and circulated case tasks list based on recent court orders and communications with Defendants.	1.3	
8/12/2024	AHS	Reviewed next steps for motion for summary judgment laid out by BBK.	0.3	
8/12/2024	AHS	Call with BBK to discuss next steps on motion for summary judgment.	0.8	
8/12/2024	AHS	Emailed team re MSJ.	0.3	
8/13/2024	GCG	Email to Magistrate judge re settlement conference.	0.1	
8/13/2024	GCG	Review defendants' opposition to plaintiffs' motion to extend discovery deadlines.	0.2	
8/13/2024	GCG	Review and analyze plaintiffs' draft motion to certify appeal re damages claims.	0.5	
8/13/2024	GCG	Conf w/ MJ re settlement conference.	0.1	
8/13/2024	JSY	Emails re potential new plaintiff.	0.1	
8/13/2024	JSY	Emails re depo prep for Dr. Barchuk.	0.1	
8/13/2024	AHS	Reviewed e-mails with co-counsel and opposing re production of documents.	0.2	
8/13/2024	AHS	Emailed with cocounsel re legal research for motion for partial summary judgment.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 973

SERVICES

Date	Person	Description of Services	Hours	Discount
8/13/2024	AHS	Researched arbitration question for class composition and outreach purposes.	0.1	
8/13/2024	KES	Review recent case emails.	0.2	
8/13/2024	DLE	Save and circulate filed pleadings.	0.4	
8/14/2024	GCG	Prepare for and conduct meeting via zoom w/ Judge Spero and defendants counsel re settlement process.	0.6	
8/14/2024	GCG	Draft memo to file re same.	0.1	
8/14/2024	GCG	Confs w/ and emails to GW, MJ and JSY re same.	0.1	
8/14/2024	GCG	Email to AS and team re defendants' rebuttal reports.	0.1	
8/14/2024	GCG	Emails to JSY and Dr. Barchuck re deposition preparation.	0.1	
8/14/2024	JSY	Emails re settlement conference.	0.1	
8/14/2024	JSY	Conf. w/ AHS re projects.	0.3	
8/14/2024	JSY	Conf. w/ GCG re pre-MSC meeting and re case tasks.	0.2	
8/14/2024	JSY	Emails re research for MSJ.	0.1	
8/14/2024	JSY	Emails re depo prep for Dr. Barchuk.	0.1	
8/14/2024	JSY	Edit barrier lists for MSJ; emails re same.	0.5	
8/14/2024	AHS	Emailed DLE and KS with assignment re compiling documents for motion for summary judgment.	0.9	
8/14/2024	AHS	Researched and updated record citations and case citation section of summary judgment motion on public accommodations.	0.9	
8/14/2024	AHS	Reviewed e-mails re: presettlement conference and motion for summary judgment.	0.4	
8/14/2024	AHS	Call with JY re research projects.	0.3	
8/14/2024	AHS	Updated internal case tasks list with dates from presettlement conference and other developments.	0.1	
8/14/2024	KES	Emails with AHS and DE re depo excerpts for summary judgment.	0.4	
8/14/2024	KES	Review minute entry and calendar deadlines following CMC; review local rules re same.	0.4	
8/14/2024	DLE	Pull deposition excerpt citations from summary judgment drafts and create table; circulate to KES.	0.9	
8/14/2024	DLE	Save down deposition excerpts as exhibits for summary judgment motion.	0.9	
8/15/2024	AHS	Updated case tasks list.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/15/2024	AHS	Discussed PRA requests with DLE.	0.5	
8/15/2024	AHS	(Billing Judgment) Polished and circulated notes re: CLE on litigation after Loper to team.	0.0	0.3
8/15/2024	KES	Review Mag J. order and calendar additional deadline.	0.2	
8/15/2024	KES	Download and circulate pleadings.	0.3	
8/15/2024	KES	Gather excerpts of depos cited in draft MSJ brief for use as exhibits; confer DE re same.	1.3	
8/15/2024	KES	Update expert files.	0.2	
8/15/2024	DLE	Prepare for upcoming meeting with AHS re PRA request project by reviewing and updating tracking chart.	0.2	
8/15/2024	DLE	Meeting with AHS re discussion of status of PRA project and next steps.	0.5	
8/16/2024	GCG	Review court order granting extension.	0.1	
8/16/2024	GCG	Review counsel emails re expert disclosures and deposition.	0.2	
8/16/2024	GCG	Meet w/ co-counseling team to discuss defendants' expert disclosures and impact on MSJ pleadings and plan for trial preparation.	1.2	
8/16/2024	JSY	Emails re MSJ.	0.2	
8/16/2024	JSY	Emails re trial estimates.	0.1	
8/16/2024	AHS	Reviewed emails and documents from opposing counsel produced on Aug 15.	0.5	
8/16/2024	AHS	Discussed case status and expert reports with DLE.	0.2	
8/16/2024	AHS	Read Anderson's rebuttal expert report.	0.5	
8/16/2024	AHS	Attended weekly meeting with DLE GCG and co-counsel to discuss Defendants' productions.	1.3	
8/16/2024	AHS	Discussed pretrial calendar with KS.	0.1	
8/16/2024	AHS	Sent follow up emails to team and co-counsel re: next steps for motion for summary judgment and pretrial calendar.	1.1	
8/16/2024	AHS	Reviewed DLE email re PRA requests and productions.	0.2	
8/16/2024	KES	Participate in team Zoom re case tasks.	0.8	
8/16/2024	KES	Download and organize expert rebuttal reports and supporting documents.	0.5	
8/16/2024	DLE	Save and circulate filed pleadings; calendar new deadlines.	0.3	
8/16/2024	DLE	Continue excerpting depositions as exhibits for summary judgment motion.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
8/16/2024	DLE	Attend and note-take meeting with co-counsel re case issues and tasks.	1.3	
8/16/2024	DLE	Finalize and circulate notes from co-counsel meeting.	0.3	
8/17/2024	GCG	Email to GW and BU re Flores deposition preparation.	0.1	
8/19/2024	JSY	Conf w/. BM re research memos.	0.5	
8/19/2024	JSY	Meeting with BBK and AHS re MSJ.	0.6	
8/19/2024	JSY	Conf w/ BM re background of case.	0.2	
8/19/2024	JSY	Emails re documents for BM review.	0.2	
8/19/2024	JSY	Research materials for BM depo.	0.2	
8/19/2024	BBK	Reviewing M. Johnson notes from pre-settlement conference w/ MJ Spero and Settlement Conference Order.	0.2	
8/19/2024	BBK	Reviewing Admin Motion for EOT to oppose Ds' decertification motion and court order granting same, and comm'ns w/ opposing counsel re stipulating to EOT.	0.2	
8/19/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re expert depositions, expert rebuttal reports, supp ROG responses, and ESI produced for former San Ramon ED Omole.	0.2	
8/19/2024	BBK	Reviewing JSY-R. Steyer emails re: comm'ns w/ potential new client and additional class rep for Brookhurst facility-specific subclass.	0.1	
8/19/2024	BBK	Emailing w/ DLE re status of PRA responses from fire dep'ts and police dep'ts re 911 calls from six facilities where named Pls' resided.	0.1	
8/19/2024	BBK	Emailing w/ RBGG team re CBC editions applicable to BD facilities built prior to ADAAG effective date.	0.1	
8/19/2024	BBK	Emailing w/ AHS re status of projects for motion for partial summary judgment.	0.2	
8/19/2024	BBK	Revising motion for partial summary judgment to include AHS updated legal cites and JSY additional balcony threshold barriers ID'd at Brookhurst.	0.3	
8/19/2024	BBK	Reviewing Pls' motion for certification of interlocutory appeal of class cert order on 23(b)(3) subclasses.	0.2	
8/19/2024	BBK	Emailing w/ KES re amended Brookhurst barrier list for Mastin FRCP 26 report.	0.1	
8/19/2024	BBK	Analyzing notes from 8/15 meeting w/ co-counsel and emails from co-counsel re: addressing Anderson's positions in rebuttal report.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/19/2024	BBK	Analyzing proposals to change strategy re: access barrier portion of MPSJ and drafting email re same to JSY and AHS.	0.8	
8/19/2024	BBK	Conferring w/ JSY and AHS re strategy meeting re MPSJ.	0.1	
8/19/2024	BBK	Reviewing JSY emails re: legal research projects.	0.2	
8/19/2024	BBK	Reviewing/commenting on AHS notes from CLE on implications of Loper Bright on litigation.	0.1	
8/19/2024	BBK	Reviewing AHS summary of Ds' rebuttal expert reports (other than Anderson) w/r/t implications for MPSJ.	0.1	
8/19/2024	BBK	Meeting w/ JSY and AHS re strategy for MPSJ.	0.6	
8/19/2024	BBK	Emailing w/ G. Wallace and M. Johnson re strategy for MPSJ.	0.2	
8/19/2024	BBK	Emailing w/ DLE and KES re depo transcript excerpt exhibits for MPSJ.	0.1	
8/19/2024	AHS	Reviewed status of projects related motion for summary judgment and updated BBK.	0.7	
8/19/2024	AHS	Read and summarized defendants' rebuttal expert reports.	1.5	
8/19/2024	AHS	Reviewed deposition excerpts for summary judgment draft and e-mailed with DLE re same.	0.2	
8/19/2024	AHS	Emailed team re arbitration related research and potential arguments.	0.2	
8/19/2024	AHS	Met with BBK and JY to discuss strategy for motion for summary judgment in light of defs' expert rebuttal reports.	0.7	
8/19/2024	BM	Meeting with JSY to discuss Brookdale legal research projects in connection with upcoming motion for partial summary judgment and trial preparation.	0.6	
8/19/2024	BM	Review Fourth Amended Complaint, Plaintiffs' Motion to Certify Order for Interlocutory Appeal, Defendants' Motion to Decertify Rule 23(b)(2) Access Barrier Subclass, and the Court's July 22 and August 9, 2024 Orders for background on the facts and current status of the case.	3.2	
8/19/2024	BM	Review SWCK Memorandum Regarding Dimensional Tolerances in ADA litigation for research project concerning access barrier section of the Motion for Partial Summary Judgment.	0.4	
8/19/2024	KES	Emails with team re expert materials served 8/15 and update electronic files re same.	0.6	
8/19/2024	KES	Review and update depo citations and excerpts and emails with team re same.	1.0	
8/19/2024	DLE	Save and circulate filed pleading.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 977

SERVICES

Date	Person	Description of Services	Hours	Discount
8/19/2024	DLE	Continue pulling and formatting deposition excerpts for motion for summary judgment; circulate work to AHS.	0.5	
8/20/2024	JSY	Emails re depo schedule.	0.1	
8/20/2024	JSY	Emails re discovery issues.	0.1	
8/20/2024	BBK	Emailing w/ co-counsel re analysis of Anderson's positions on access barriers identified by Pls' experts at the six named Plaintiff facilities.	0.2	
8/20/2024	BBK	Emailing w/ KES re supporting evidence for motion for partial summary judgment.	0.1	
8/20/2024	BBK	Emailing w/ BM re legal research on dimensional tolerances for access barriers.	0.1	
8/20/2024	BBK	Preparing for meeting w/ co-counsel re motion for partial summary judgment strategy w/r/t access barriers.	0.3	
8/20/2024	BBK	Meeting w/ GW and MJ re motion for partial summary judgment strategy w/r/t access barriers.	0.7	
8/20/2024	BBK	Drafting/sending report to RBGG team re meeting w/ GW and MJ re motion for partial summary judgment strategy w/r/t access barriers.	0.4	
8/20/2024	BBK	Meeting w/ BM re legal research for motion for partial summary judgment.	0.4	
8/20/2024	BBK	Reviewing KES report re recent DSS inspections of BD Scotts Valley.	0.1	
8/20/2024	BBK	Emailing w/ AHS & R. Steyer re call from child of member of Brookhurst subclass.	0.1	
8/20/2024	BBK	Reviewing M. Johnson - OC emails re Ds' inadequate supp ROG responses re access barriers and ID of docs considered by Anderson for rebuttal report opinions.	0.2	
8/20/2024	BBK	Conferring w/ KES re preparing motion for partial summary judgment.	0.3	
8/20/2024	BBK	Conducting analysis of common area undisputed barriers at Scotts Valley for inclusion in MPSJ.	3.0	
8/20/2024	AHS	Emailed with team re upcoming depositions.	0.3	
8/20/2024	AHS	Reviewed emails with team and cocounsel re: motion for summary judgment and expert disclosures.	0.6	
8/20/2024	BM	Review SWCK Memorandum Regarding Dimensional Tolerances in ADA litigation for research project concerning access barrier section of the Motion for Partial Summary Judgment.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/20/2024	BM	Meeting with BBK to discuss dimension tolerances and access barrier research project in connection with Motion for Partial Summary Judgment.	0.6	
8/20/2024	BM	Review past legal research memoranda for research project as to use of videotaped deposition testimony during trial.	0.4	
8/20/2024	KES	Review NODs and calendar depo dates.	0.2	
8/20/2024	KES	Review DSS alerts re Scotts Valley.	0.2	
8/20/2024	DLE	Save and circulate notices of depositions and internal work products re barrier lists.	0.2	
8/20/2024	DLE	Make adjustments to deposition excerpts that will be used as exhibits in summary judgment motion.	0.5	
8/21/2024	JSY	Emails re expert depo start times.	0.2	
8/21/2024	BBK	Reviewing M. Johnson email to access experts re depo prep.	0.1	
8/21/2024	BBK	Analyzing Anderson's annotated positions on access barrier lists for Fountaingrove, Hemet and Tracy.	2.0	
8/21/2024	BBK	Emailing w/ co-counsel re analysis Anderson's annotated positions on access barrier lists.	0.3	
8/21/2024	BBK	Revising proposed list of undisputed Scotts Valley common area barriers for inclusion in MPSJ based on GW comments and revisions; emailing co-counsel and RBGG team re next steps ILO same.	0.5	
8/21/2024	BBK	Conferring w/ DLE re plan for preparing MPSJ for filing.	0.1	
8/21/2024	BBK	Conferring w/ co-counsel and RBGG team re deposition of Omole; reviewing emails w/ OC re scheduling same.	0.2	
8/21/2024	BBK	Reviewing emails w/ opposing counsel re Barchuk and Cross depositions.	0.1	
8/21/2024	BBK	Drafting/sending assignment to KES and DLE re identifying and compiling photos of common area barriers for MPSJ.	0.2	
8/21/2024	BBK	Conducting analysis of undisputed common barriers at San Ramon for inclusion in MPSJ.	2.5	
8/21/2024	AHS	Read emails with co-counsel re barrier lists.	0.2	
8/21/2024	AHS	Emailed with team re staffing upcoming deposition.	0.2	
8/21/2024	BM	Conduct legal research on the use of videotaped deposition testimony during trial.	2.1	
8/21/2024	BM	Conduct legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	2.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/21/2024	BM	Draft memo regarding legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	1.0	
8/21/2024	KES	Review notices and calendar expert depos.	0.2	
8/21/2024	DLE	Save and circulate facility analyses from BBK.	0.2	
8/22/2024	GCG	Conf w/ JSY re trial staffing and MSJ work.	0.2	
8/22/2024	JSY	Emails re expert depos.	0.1	
8/22/2024	JSY	Conf. w/ GCG re status of MSJ projects.	0.1	
8/22/2024	JSY	Messages re Omole deposition.	0.1	
8/22/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions.	0.1	
8/22/2024	BBK	Emailing w/ AHS re preparing BBK Decl ISO MPSJ.	0.2	
8/22/2024	BBK	Reviewing/responding to BM question re legal research into dimensional tolerances for MPSJ.	0.2	
8/22/2024	BBK	Reviewing/incorporating GW comments/revisions to BBK analysis of undisputed San Ramon common area barriers for inclusion in MPSJ; emails w/ co-counsel and RBGG team re assignments re same.	0.3	
8/22/2024	BBK	Emails w/ KES and DLE re identifying photos of common area barriers for MPSJ.	0.3	
8/22/2024	BBK	Emails w/ RBGG team re outreach to and from class members.	0.1	
8/22/2024	BBK	Conducting analysis of undisputed Brookhurst common area barriers for inclusion in MPSJ.	1.8	
8/22/2024	BBK	Conferring w/ JSY and AHS re Omole deposition.	0.2	
8/22/2024	BBK	Reviewing/incorporating GW revisions to analysis of undisputed Brookhurst common area barriers for inclusion in MPSJ; emailing RBGG team re assignments from same.	0.3	
8/22/2024	BBK	Emailing w/ co-counsel re number of barriers identified for MPSJ.	0.2	
8/22/2024	BBK	Analysis of undisputed Fountaingrove common area barriers for inclusion in MPSJ.	2.0	
8/22/2024	AHS	Reviewed emails with co-counsel re barrier section of motion for summary judgment.	0.5	
8/22/2024	AHS	Drafted beginning portions of BBK declaration ISO motion for summary judgment.	0.2	
8/22/2024	AHS	Communicated with team re: depo of Omole.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/22/2024	BM	Draft email to BBK regarding legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	1.2	
8/22/2024	BM	Conduct legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	3.5	
8/22/2024	BM	Draft chart memorandum summarizing legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	2.6	
8/22/2024	KES	TC Brookdale resident and email team re same.	0.3	
8/22/2024	KES	Review and organize photos corresponding to Scotts Valley barriers for summary judgment and update draft list with references.	1.5	
8/22/2024	KES	Emails with DE re barrier list and photo issues.	0.3	
8/22/2024	DLE	Begin compiling photo sets of barriers for motion for summary judgment.	1.8	
8/22/2024	DLE	Confer with KES re barrier photo set task for summary judgment.	0.1	
8/23/2024	JSY	Team meeting.	1.0	
8/23/2024	JSY	Meeting with RBGG team re MSJ tasks.	0.5	
8/23/2024	BBK	Emailing w/ G. Wallace re strategy for access barrier section of MPSJ.	0.2	
8/23/2024	BBK	Reviewing/incorporating GW comments and revisions to BBK analysis of undisputed common area barriers at Fountaingrove for MPSJ.	0.4	
8/23/2024	BBK	Comm'ns w/ RBGG team re outreach from member of Brookhurst facility-specific subclass.	0.1	
8/23/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions; emailing w/ co-counsel re transcript of Rubin deposition.	0.1	
8/23/2024	BBK	Meeting w/ co-counsel re MPSJ and other case tasks; post-co-counsel meeting w/ RBGG team re same.	1.4	
8/23/2024	BBK	Emailing w/ co-counsel re MPSJ arguments and evidence supporting same after co-counsel team meeting.	0.1	
8/23/2024	BBK	Emailing w/ KES and GW re barriers to exclude from MPSJ at Scotts Valley and San Ramon.	0.3	
8/23/2024	BBK	Emailing w/ DLE re identifying photographs of common barriers for MPSJ.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/23/2024	BBK	Analyzing undisputed common area barriers at Hemet to ID which to recommend including in MPSJ; emailing w/ co-counsel and RBGG team re same.	2.7	
8/23/2024	BBK	Reviewing/revising AHS updated filing checklist for MPSJ.	0.1	
8/23/2024	BBK	Conferring w/ AHS re legal research for MPSJ.	0.1	
8/23/2024	AHS	Discussed barriers and upcoming assignments with DLE.	0.2	
8/23/2024	AHS	Reviewed e-mails re: motion for partial summary judgment and upcoming depositions.	0.6	
8/23/2024	AHS	Worked on BBK declaration ISO motion for partial summary judgment.	0.3	
8/23/2024	AHS	Weekly co-counsel meeting with JY BBK DLE KS BM.	0.9	
8/23/2024	AHS	Attended meeting with JY BBK DLE BM KS to discuss assignments related to motion for partial summary judgment.	0.5	
8/23/2024	AHS	Updated case tasks list.	0.3	
8/23/2024	AHS	Drafted section of MSJ asserting Brookdale are long term care facilities subject to the 95% compliance regulation.	1.8	
8/23/2024	AHS	Communicated with team re: DSS licenses for Brookdale facilities.	0.4	
8/23/2024	BM	Attend weekly Brookdale co-counsel meeting to discuss case updates and action items.	1.0	
8/23/2024	BM	Debrief with internal RBGG team after weekly Brookdale co-counsel meeting.	0.3	
8/23/2024	BM	Draft chart memorandum summarizing legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	2.2	
8/23/2024	BM	Conduct legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	3.4	
8/23/2024	KES	Review DSS documents relating to facility licenses.	0.3	
8/23/2024	KES	Review summary judgment checklist and Judge standing orders re same.	0.2	
8/23/2024	KES	Organize Rubin depo transcript.	0.1	
8/23/2024	KES	Participate in Zoom with co-counsel.	1.0	
8/23/2024	KES	Continue gathering barrier photos and revisions to barrier lists.	2.0	
8/23/2024	DLE	Attend and note-take weekly co-counsel meeting and firm-only debrief.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/23/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting and firm-only debrief.	0.5	
8/23/2024	DLE	Meeting with AHS to discuss case issues and tasks.	0.2	
8/23/2024	DLE	Compile photo sets of undisputed common area barriers for motion for summary judgment exhibits.	2.0	
8/24/2024	JSY	Review Dr. Barchuk Rule 26 report to prepare for deposition.	0.3	
8/24/2024	BBK	Reviewing/incorporating GW comments and revisions to BBK analysis of undisputed common area barriers at Hemet for MPSJ.	0.3	
8/24/2024	BBK	Analyzing 5 facility lists of undisputed common barriers to propose additional barriers to cut; emailing w/ G. Wallace and RBGG team re same.	1.0	
8/25/2024	GCG	Review emails from BBK and GW re revisions to barriers in MSJ.	0.1	
8/25/2024	BBK	Revising lists of undisputed common barriers at each of five facilities per MPSJ based on GW-BBK comm'ns.	0.4	
8/25/2024	BBK	Emailing w/ KES and DLE re identifying photos of common barriers at Fountaingrove and Hemet for MPSJ.	0.1	
8/25/2024	DLE	Compile images of undisputed common area barriers at Fountaingrove for Motion for Summary Judgment exhibits.	1.6	
8/26/2024	JSY	Emails re expert barrier lists for MSJ.	0.1	
8/26/2024	JSY	Conf. w/ BBK re MSJ tasks.	0.4	
8/26/2024	JSY	Emails MSJ.	0.1	
8/26/2024	BBK	Emailing w/ AHS re exhibits for BBK Decl ISO Motion for Partial Summary Judgment.	0.1	
8/26/2024	BBK	Phone call w/ JSY re plan for MPSJ and for Opposition to Ds' MPSJ.	0.6	
8/26/2024	BBK	Emailing w/ JSY re BBK Decl ISO MPSJ.	0.1	
8/26/2024	BBK	Emailing w/ M. Johnson re plan for expert decls and supporting exhibits for MPSJ; conferring w/ JSY re same.	0.2	
8/26/2024	BBK	Drafting assignment for DLE/KES re helping to prepare narrowed barrier lists for Mastin and Waters Decls ISO MPSJ.	0.2	
8/26/2024	BBK	Meeting w/ DLE/KES re helping to prepare narrowed barrier lists for Mastin and Waters Decls ISO MPSJ.	0.3	
8/26/2024	BBK	Reviewing/commenting on KES chart for narrowed barrier list for Hemet.	0.2	
8/26/2024	BBK	Planning/drafting revised barrier section of MPSJ.	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/26/2024	AHS	Reviewed e-mails from co-counsel and opposing counsel re motion for summary judgment and upcoming depositions.	0.4	
8/26/2024	BM	Conduct legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	3.8	
8/26/2024	BM	Draft chart memorandum summarizing legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	2.4	
8/26/2024	KES	Check DSS site for 6 facility license info.	0.3	
8/26/2024	KES	Update Hemet barrier list and gather photos re same.	1.2	
8/26/2024	KES	Confer BBK re cross-referencing Anderson and 2024 barrier numbers and begin review of same.	0.8	
8/26/2024	DLE	Make BBK's edits to photo set of barriers for Fountaingrove summary judgment exhibit; circulate photo set to team.	0.7	
8/26/2024	DLE	Check-in meeting with BBK and KES re task for numbering barriers for summary judgment motion.	0.3	
8/27/2024	GCG	Review BBK emails re revisions to MSJ pleadings.	0.2	
8/27/2024	GCG	Email to BM and GW re tolerances and MSJ.	0.1	
8/27/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions.	0.2	
8/27/2024	BBK	Emailing w/ KES and DLE re narrowed barrier list exhibits for Mastin and Waters Decls ISO MPSJ.	0.2	
8/27/2024	BBK	Emailing w/ BM re status of legal research on dimensional tolerances for MPSJ.	0.2	
8/27/2024	BBK	Emailing w/ AHS re status of drafting insert for MPSJ and preparing BBK Decl ISO same.	0.2	
8/27/2024	BBK	Conferring w/ AHS re hearings on motion to certify interlocutory appeal and motion to decertify classes.	0.1	
8/27/2024	BBK	Analyzing BM legal memo re dimensional tolerances for MPSJ.	0.3	
8/27/2024	BBK	Phone call w/ BM re legal research for MPSJ.	0.2	
8/27/2024	BBK	Emailing w/ BM re legal research re voluntary cessation exception to mootness for Opp to Ds' MSJ.	0.1	
8/27/2024	BBK	Emailing w/ BM re additional legal research re dimensional tolerances and sending same to co-counsel.	0.2	
8/27/2024	BBK	Reviewing/responding to G.W. questions re Opp to Motion for Clarification of Class Definition and re: status of revised draft MPSJ.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/27/2024	BBK	Emailing JSY re next steps for preparing narrowed barrier list exhibits for Mastin & Waters Decls ISO MPSJ.	0.1	
8/27/2024	BBK	Conferring w/ JSY re status projects for MPSJ.	0.1	
8/27/2024	BBK	Researching/drafting barriers section of MPSJ.	6.9	
8/27/2024	AHS	Emailed with BBK and team re: upcoming hearings and motion for summary judgment.	0.3	
8/27/2024	AHS	Updated case tasks list.	0.2	
8/27/2024	AHS	Reviewed BM memo on dimensional tolerances.	0.5	
8/27/2024	AHS	Drafted section of motion for summary judgment on ADAAG subsection.	4.9	
8/27/2024	BM	Draft memo summarizing chart with legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	1.2	
8/27/2024	BM	Call with BBK to discuss legal research as to dimension tolerances and access barriers and other research projects in connection with motion for partial summary judgment.	0.3	
8/27/2024	BM	Conduct follow up legal research as to dimension tolerances and access barriers in connection with motion for partial summary judgment.	0.9	
8/27/2024	BM	Conduct legal research on the use of videotaped deposition testimony during trial.	1.9	
8/27/2024	BM	Draft memorandum summarizing legal research on the use of videotaped deposition testimony during trial.	1.2	
8/27/2024	BM	Review summer associate memorandum on the voluntary cessation exception to mootness as part of research project in connection with motion for partial summary judgment.	0.7	
8/27/2024	KES	Continue review and comparison of expert barrier list numbers in connection with prep for MSPJ.	2.6	
8/27/2024	DLE	Create document cross-referencing plaintiff and defendant expert barrier numbers for 1 facility.	2.0	
8/28/2024	GCG	Conf w/ BBK re status of SJ pleadings.	0.3	
8/28/2024	GCG	Conf w/ and emails to JSY re MSJ pleadings and trial preparation.	0.3	
8/28/2024	GCG	Review stipulation to extend time.	0.1	
8/28/2024	JSY	Conf. w/ BBK re MSJ.	0.2	
8/28/2024	JSY	Prepare revised barrier lists for MPSJ; emails re same.	0.7	
8/28/2024	JSY	Emails re trial estimates.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/28/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re expert depositions.	0.1	
8/28/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re providing trial length estimate to Court and re: stipulation for extension of time re same.	0.1	
8/28/2024	BBK	Conferring w/ JSY re status of MPSJ work and BM's legal research re same.	0.1	
8/28/2024	BBK	Phone call w/ JSY re preparing MPSJ and supporting docs.	0.2	
8/28/2024	BBK	Emails re preparing narrowed barrier lists for Mastin and Waters Decls ISO MPSJ.	0.1	
8/28/2024	BBK	Emailing w/ AHS re draft insert for MPSJ and preparing BBK Decl ISO MPSJ.	0.2	
8/28/2024	BBK	Emailing w/ BM re legal research into voluntary cessation exception to mootness.	0.1	
8/28/2024	BBK	Phone call w/ GCG re preparing MPSJ.	0.3	
8/28/2024	BBK	Researching/drafting barriers section for MPSJ.	10.1	
8/28/2024	AHS	Revised section of MPSJ on status as "long term care facilities".	1.3	
8/28/2024	AHS	Reviewed e-mails with co-counsel and opposing counsel re depositions and filing deadlines.	0.3	
8/28/2024	AHS	Discussed tasks related to MPSJ with KS.	0.2	
8/28/2024	AHS	Worked on BBK declaration ISO MPSJ.	2.4	
8/28/2024	BM	Review summer associate memorandum on the voluntary cessation exception to mootness as part of research project in connection with motion for partial summary judgment.	0.3	
8/28/2024	BM	Conduct legal research on the voluntary cessation exception to mootness in connection with motion for partial summary judgment.	2.8	
8/28/2024	BM	Draft memorandum on the voluntary cessation exception to mootness in connection with motion for partial summary judgment.	2.7	
8/28/2024	KES	Prepare PDF versions of BBK summary judgment exhibits produced in native format.	1.7	
8/28/2024	DLE	Create document with table comparing plaintiff and defendant expert barrier item numbers for 1 facility; circulate to team.	1.3	
8/29/2024	GCG	Conf w/ and emails to JSY re MSJ and trial staffing and plan.	0.3	
8/29/2024	GCG	Meet via zoom w/ BBK and JSY re pleadings for MSJ.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/29/2024	GCG	Emails to GW, MJ and JSY re declarations ISO MSJ.	0.2	
8/29/2024	JSY	Two conf. w/ BBK re MSJ.	0.5	
8/29/2024	JSY	Conf. and emails w/ GCG re MSJ and other case tasks.	0.7	
8/29/2024	JSY	Meeting with BBK and GCG re MPSJ.	0.5	
8/29/2024	JSY	Emails re MSJ issues.	0.2	
8/29/2024	JSY	Further emails re barrier lists.	0.3	
8/29/2024	BBK	Drafting motion for partial summary judgment.	3.1	
8/29/2024	BBK	Phone call w/ JSY re draft MPSJ.	0.2	
8/29/2024	BBK	Drafting/sending email to co-counsel and RBGG team re draft MPSJ and proposed strategy re what to exclude from same.	0.2	
8/29/2024	BBK	Emailing w/ AHS re legal research on whether RCFEs qualify as Medical Facilities under ADAAG.	0.3	
8/29/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re expert depositions.	0.1	
8/29/2024	BBK	Emailing w/ KES and AHS re admin motion for sealing for MPSJ.	0.1	
8/29/2024	BBK	Preparing MPSJ and supporting docs for filing.	0.1	
8/29/2024	BBK	Emailing w/ RBGG Team re next tasks for MPSJ filing.	0.2	
8/29/2024	BBK	Emailing w/ RBGG team re Waters & Mastin depos.	0.1	
8/29/2024	BBK	Updating/distributing to RBGG team filing checklist and tasklist for MPSJ.	0.2	
8/29/2024	BBK	Reviewing Supp Waters Expert Report.	0.2	
8/29/2024	BBK	Conferring w/ RBGG team re Ds' objections to supp expert report and sending legal research re same to co-counsel for M&C.	0.2	
8/29/2024	BBK	Reviewing/commenting on AHS draft BBK Decl ISO MPSJ.	0.3	
8/29/2024	BBK	Emailing w/ JSY and co-counsel re meeting on MPSJ and other case priorities.	0.1	
8/29/2024	BBK	Phone call w/ JSY re strategy for MPSJ and supporting docs.	0.3	
8/29/2024	BBK	Meeting w/ JSY and GCG re plan for completing MPSJ and supporting docs.	0.4	
8/29/2024	BBK	Emailing w/ G. Wallace re further revisions to MPSJ.	0.1	
8/29/2024	BBK	Phone call w/ AHS re revisions needed to BBK Decl ISO MPSJ.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 987

SERVICES

Date	Person	Description of Services	Hours	Discount
8/29/2024	BBK	Emailing w/ AHS re identifying and creating additional exhibits for BBK Decl ISO MPSJ.	0.2	
8/29/2024	BBK	Emailing w/ JSY and M. Johnson re plan for Mastin and Waters Decls ISO MPSJ.	0.2	
8/29/2024	AHS	Discussed tasks related to MPSJ and upcoming deadlines with DLE.	0.7	
8/29/2024	AHS	Drafted additional portions of BBK Decl ISO MPSJ.	2.9	
8/29/2024	AHS	Updated case tasks list and schedule with new deposition dates.	0.2	
8/29/2024	AHS	Worked on BBK Declaration ISO MPSJ, including by identifying new record documents to download and reference in declaration.	2.8	
8/29/2024	AHS	Met with DLE to discuss how to pull documents for exhibits to BBK Decl ISO MPSJ.	0.3	
8/29/2024	AHS	Identified prior research memo and circulated it to co-counsel.	0.2	
8/29/2024	AHS	Call with BBK re additional edits to BBK Decl ISO MPSJ.	0.2	
8/29/2024	BM	Draft memorandum on the voluntary cessation exception to mootness in connection with motion for partial summary judgment.	3.3	
8/29/2024	KES	Calendar deadline.	0.1	
8/29/2024	KES	Update expert folders.	0.1	
8/29/2024	KES	Email team re supplemental expert decls.	0.1	
8/29/2024	KES	Email AHS re depos in connection with summary judgment.	0.2	
8/29/2024	KES	Consider sealing issues for summary judgment.	0.3	
8/29/2024	KES	Review and circulate pleading.	0.1	
8/29/2024	DLE	Meeting with AHS re case tasks and updates.	0.7	
8/29/2024	DLE	Confer with AHS re pulling exhibits for summary judgment motion.	0.3	
8/30/2024	GCG	Prepare for and conduct meeting w/ co-counsel re expert depositions and MSJ.	0.7	
8/30/2024	GCG	Conf w/ and emails to JSY re revisions to MSJ barrier lists and expert declarations.	0.4	
8/30/2024	GCG	Review Flores rebuttal report.	0.1	
8/30/2024	JSY	Conf. w/ GCG re barrier lists and other case issues.	0.2	
8/30/2024	JSY	Call with GG re MSJ tasks.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/30/2024	JSY	Conf. re barrier list edits.	0.2	
8/30/2024	JSY	Conf. w/ BBK re edits to barrier lists.	0.2	
8/30/2024	JSY	Meetings with BBK and MTJ re Mastin and Waters decl re MSJ and barrier lists.	1.2	
8/30/2024	JSY	Team meeting.	1.0	
8/30/2024	JSY	Draft JM declaration and prepare updated barrier lists for MSJ; multiple emails re same.	2.4	
8/30/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions, supp doc prod, and Pls' request for EOT on Daubert Motion Deadline and deadline for Reply ISO Motion to Certify Appeal.	0.1	
8/30/2024	BBK	Preparing for meeting w/ JSY and M. Johnson re plan for Mastin & Waters Decls ISO MPSJ.	0.2	
8/30/2024	BBK	Meeting w/ JSY and M. Johnson re plan for Mastin & Waters Decls ISO MPSJ.	1.4	
8/30/2024	BBK	Meeting w/ RBGG team and co-counsel re case priorities and tasks.	0.6	
8/30/2024	BBK	Drafting/sending proposal to G. Wallace, M. Johnson, GG and JSY re expert decls and exhibits for MPSJ.	0.4	
8/30/2024	BBK	Emailing w/ JSY and RBGG team re preparing Anderson Annotated barrier lists as exhibits to BBK Decl and updating narrowed barrier lists.	0.2	
8/30/2024	BBK	Reviewing/commenting on AHS revisions to BBK Decl ISO MPSJ.	0.2	
8/30/2024	BBK	Emailing w/ JSY and M. Johnson re Mastin and Waters Decls ISO MPSJ and exhibits to same.	0.2	
8/30/2024	BBK	Emailing w/ JSY and M. Johnson Mastin and Waters re CBC citations.	0.2	
8/30/2024	BBK	Phone call w/ JSY re narrowed access barrier lists.	0.1	
8/30/2024	BBK	Emailing w/ BM re legal research on voluntary cessation/mootness.	0.2	
8/30/2024	BBK	Drafting revised version of MPSJ (including CBC provision fact checking).	7.5	
8/30/2024	BBK	Emailing w/ GW, MJ, GCG and JSY re revised MPSJ.	0.1	
8/30/2024	AHS	Reviewed team e-mails re: upcoming depositions and documents attached to BBK decl.	0.3	
8/30/2024	AHS	Identified and downloaded additional documents to attach to BBK decl.	0.3	
8/30/2024	AHS	Updated BBK decl ISO MPSJ.	2.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
8/30/2024	AHS	Attended weekly meeting with co-counsel and BBK JK GCG DLE KS BM to discuss upcoming depos and other case tasks.	0.7	
8/30/2024	AHS	Updated BBK decl.	0.8	
8/30/2024	AHS	Emailed with team re BBK decl and exhibits.	0.3	
8/30/2024	BM	Attend weekly meeting with co-counsel to discuss case updates and upcoming action items in the case.	0.7	
8/30/2024	BM	Draft memorandum on the voluntary cessation exception to mootness in connection with motion for partial summary judgment.	6.2	
8/30/2024	KES	Team Zoom meeting re MSJ and depos.	0.5	
8/30/2024	KES	Gather and prepare additional exhibits for BBK Decl in support of summary judgment.	3.5	
8/30/2024	KES	Research re online collaboration.	0.1	
8/30/2024	DLE	Pull and finalize deposition excerpts for summary judgment motion exhibits.	1.5	
8/30/2024	DLE	Attend and note-take weekly co-counsel meeting.	0.6	
8/30/2024	DLE	Finalize and circulate notes from weekly meeting with co-counsel.	0.3	
8/30/2024	DLE	Cross-check exhibits from declaration are saved and finalized in internal folder; create table and circulate findings.	0.9	
8/30/2024	DLE	Confer with AHS re pulling exhibits for summary judgment task.	0.1	
8/31/2024	GCG	Review and revise MPAs ISO motion for summary judgment.	1.4	
8/31/2024	GCG	Emails GW-JSY-BBK re same.	0.2	
8/31/2024	JSY	Draft expert declarations and prepare barrier lists for MPSJ; emails re same.	0.8	
8/31/2024	JSY	Review and edit MPSJ; emails re same.	1.0	
8/31/2024	BBK	Emailing w/ JSY, GCG and G. Wallace re comments on MPSJ.	0.1	
9/1/2024	GCG	Conference with BBK re further revisions to MPAs in support of MSJ.	0.4	
9/1/2024	GCG	Emails GW-BBK-JSY re same.	0.3	
9/1/2024	GCG	Review and analyze Anderson rebuttal report.	0.3	
9/1/2024	GCG	Review and analyze exhibits to BBK declaration.	0.4	
9/1/2024	GCG	Emails with MJ - team re Saad and Baird depositions.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 990

SERVICES

Date	Person	Description of Services	Hours	Discount
9/1/2024	GCG	Email with GW re DOJ.	0.2	
9/1/2024	GCG	Email JSY - MJ re omnibus motion to seal.	0.1	
9/1/2024	JSY	Emails re MSJ issues.	0.2	
9/1/2024	JSY	Emails re omnibus sealing motion.	0.2	
9/1/2024	MWB	Email w/ GCG and GW re DOJ reach out.	0.1	
9/1/2024	BBK	Comm'ns w/ co-counsel re: Ds' proposed stipulation to file omnibus sealing motion for filings related to parties' dispositive motions and reviewing/commenting on same.	0.2	
9/1/2024	BBK	Emailing w/ JSY and GCG re plan for MPSJ.	0.1	
9/1/2024	BBK	Phone call w/ GCG re plan for MPSJ.	0.4	
9/1/2024	BBK	Conferring w/ KES re identifying exhibits to BBK Decl to be filed under seal.	0.1	
9/1/2024	BBK	Reviewing JSY and GCG proposed edits to MPSJ; revising accordingly.	2.2	
9/1/2024	BBK	Emailing w/ co-counsel and GCG re expert deposition of Saad re testimony for ADA trial.	0.1	
9/1/2024	BBK	Emailing w/ co-counsel and JSY re G. Waters markups to narrowed barrier list for Fountaingrove.	0.1	
9/1/2024	BBK	Emailing w/ G Wallace re revisions to MPSJ.	0.2	
9/2/2024	GCG	Review and revise opposition to motion to de-certify.	0.4	
9/2/2024	GCG	Email with GW re same.	0.1	
9/2/2024	GCG	Emails team re Barchuk deposition preparation.	0.2	
9/2/2024	GCG	Conf with JSY and BBK and emails team re exhibits needed for motion and Mastin and Waters opinions.	0.5	
9/2/2024	GCG	Emails MJ - Defendants re stipulation for extension of time.	0.1	
9/2/2024	JSY	Two conf. w/ BBK re MSJ.	0.6	
9/2/2024	JSY	Conf. and emails re Barchuk depo.	0.1	
9/2/2024	JSY	Conf. w/ MTJ re barrier lists.	0.2	
9/2/2024	JSY	Edit stip re omnibus sealing motion; emails re same.	0.4	
9/2/2024	JSY	Edit docs re MSJ and barrier lists; emails re same.	1.3	
9/2/2024	BBK	Reviewing emails w/ OC re stipulating to EOT for Pls' Reply ISO Motion for Certification of Interlocutory Appeal and stipulation re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/2/2024	BBK	Reviewing JSY-M. Jacobsen emails re revising/finalizing/filing stip re omnibus sealing motion.	0.1	
9/2/2024	BBK	Reviewing emails w/ co-counsel re prep for Barchuk deposition and re Opp to Motion to Decertify Class.	0.1	
9/2/2024	BBK	Phone call w/ KES re assignment to ID BBK Decl Exhibits to be filed under seal and preparing Appendix to Sealing Motion for Same.	0.3	
9/2/2024	BBK	Phone calls w/ JSY re plan for completing MPSJ and supporting pleadings.	0.5	
9/2/2024	BBK	Emailing w/ RBGG team re preparing exhibits for Mastin and Waters Decls ISO MPSJ.	0.1	
9/2/2024	BBK	Identifying corrections needed for CBC citations and exhibits for CBC and CPC editions relevant to MPSJ; emails w/ JSY and M. Johnson re same.	0.5	
9/2/2024	BBK	Emailing w/ BM and AHS re plan for MPSJ.	0.2	
9/2/2024	BBK	Emailing w/ KES re analysis of BBK Decl EXhibits for sealing motion.	0.1	
9/2/2024	BBK	Phone call w/ JSY re further revisions needed to BBK Decl ISO MPSJ and Exhibits thereto.	0.2	
9/2/2024	BBK	Revising BBK Decl ISO MPSJ and Exhibits thereto; updating exhibits to be included in brief.	3.7	
9/2/2024	BBK	Planning immediate tasks for MPSJ for BM, AHS and KES.	0.2	
9/2/2024	AHS	Emailed co-counsel re pretrial schedule.	0.3	
9/2/2024	KES	Review BBK Decl ISO and identify all exhibits that potentially need to be filed under seal; create exhibit index re same.	4.0	
9/3/2024	GCG	Prepare for and conduct meeting by zoom w/ Dr. Barchuk and JSY to prepare for deposition.	1.1	
9/3/2024	GCG	Email to GW and MWB re DOJ.	0.1	
9/3/2024	GCG	Email to JSY and team re MSJ pleadings.	0.1	
9/3/2024	JSY	Conf. and emails re MPSJ; review docs re same.	0.6	
9/3/2024	JSY	Prep for AB deposition; emails re same.	1.0	
9/3/2024	JSY	Prep meeting with AB and GCG.	1.0	
9/3/2024	JSY	Edit docs re MPSJ; multiple conf. and emails re same.	1.8	
9/3/2024	MWB	Emails to GW and GCG re DOJ.	0.2	
9/3/2024	BBK	Identifying additional/updated exhibits for BBK declaration ISO MPSJ.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/3/2024	BBK	Reviewing co-counsel - opposing counsel emails re Daubert Motion deadline; conferring w/ RBGG team re same.	0.1	
9/3/2024	BBK	Making further revisions to BBK Decl ISO PMSJ.	0.2	
9/3/2024	BBK	Conferring w/ DLE re creating new exhibits for BBK Decl ISO MPSJ; reviewing/approving same.	0.2	
9/3/2024	BBK	Meeting w/ JSY re tasks for MPSJ.	0.2	
9/3/2024	BBK	Meeting w/ BM re conducting legal cite check for MPSJ.	0.1	
9/3/2024	BBK	Emailing and meeting w/ KES re creating Appendix A for Admin Sealing Motion by IDing BBK Exhibits to be filed under seal.	0.4	
9/3/2024	BBK	Meeting w/ AHS re organizing Exhibits for BBK Decl ISO MPSJ and record cite check for MPSJ.	0.3	
9/3/2024	BBK	Revising MPSJ to include record citations to BBK Decl and Exhibits.	2.8	
9/3/2024	BBK	Phone calls w/ JSY re preparing Mastin and Waters Decls ISO MPSJ and Exhibits to Same.	0.3	
9/3/2024	BBK	Drafting insert for Mastin Decl ISO MPSJ and FN for brief re applicable versions of CBC for San Ramon.	0.3	
9/3/2024	BBK	Meeting w/ AHS re record cite check for MPSJ.	0.2	
9/3/2024	BBK	Meetings w/ JSY re next steps for MPSJ and supporting pleadings.	0.5	
9/3/2024	BBK	Conferring w/ BM re results of legal cite check for MPSJ.	0.1	
9/3/2024	BBK	Phone call w/ G. Wallace re comments on MPSJ.	0.1	
9/3/2024	BBK	Revising MPSJ (including incorporating legal cite to same).	0.8	
9/3/2024	BBK	Emails w/ JSY, G Waters and J Mastin re expert declarations ISO MPSJ.	0.2	
9/3/2024	BBK	Updating filing checklist and tasklist for MPSJ; emailing RBGG team re same.	0.3	
9/3/2024	BBK	Emails w/ KES and AHS re finalizing BBK Decl and exhibits thereto, index of same, and Appendix A for Admin Sealing Motion.	0.2	
9/3/2024	BBK	Reviewing/commenting on KES draft Appendix A for Admin Sealing Motion.	0.2	
9/3/2024	BBK	Revising MPSJ (including incorporating record cite check by AHS and G Waters' revisions to narrowed barrier list for Fountaingrove).	1.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 993

SERVICES

Date	Person	Description of Services	Hours	Discount
9/3/2024	BBK	Reviewing Pls' Opp to Motion to Decertify Facility-Specific Subclasses.	0.3	
9/3/2024	AHS	Reviewed e-mails with co-counsel and team re: upcoming deadlines and state of MPSJ.	0.6	
9/3/2024	AHS	Met with BBK to discluss next steps for BBK declaration ISO MPSJ.	0.4	
9/3/2024	AHS	Updated folder of exhibits to attach to BBK decl.	3.1	
9/3/2024	AHS	Citechecked record citations in motion for partial summary judgment.	4.0	
9/3/2024	BM	Send draft memorandum on the voluntary cessation exception to mootness in connection with motion for partial summary judgment to entire team.	0.3	
9/3/2024	BM	Conduct cite check of legal authorities in current draft of Plaintiffs' motion for partial summary judgment.	4.7	
9/3/2024	BM	Meeting with BBK to discuss tasks for motion for partial summary judgment filing.	0.2	
9/3/2024	KES	Emails with court reporting service setting up firm dashboard for all transcripts.	0.2	
9/3/2024	KES	Download and organize Waters depo transcript and circulate to team.	0.3	
9/3/2024	KES	Download and circulate pleadings.	0.2	
9/3/2024	KES	Gather and prepare summary judgment exhibits and exhibit indices; review documents and confer team re same.	6.8	
9/3/2024	DLE	Create remaining exhibits to BBK declaration for summary judgment motion and circulate to team; confer with BBK re same.	0.7	
9/3/2024	DLE	Save and circulate filed pleadings; calendar new deadlines per orders.	0.2	
9/3/2024	DLE	Re-order photo compilations of barriers per JSY; circulate to team.	1.1	
9/3/2024	DLE	Create slip sheets for BBK declaration for summary judgment motion.	0.4	
9/4/2024	GCG	Conf with and emails JSY re preparation for Dr. Barchuk depositions.	0.3	
9/4/2024	GCG	Confs with JSY and KES re status of MSJ pleadings.	0.2	
9/4/2024	GCG	Emails GW - BBK - JSY re revisions to MPAs and Proposed Order ISO SJ.	0.3	
9/4/2024	JSY	Two conf. w/ AB re depo prep.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/4/2024	JSY	Draft and edit docs re MPSJ; multiple emails re same; multiple conf. re same.	2.8	
9/4/2024	JSY	Prep for AB depo.	0.4	
9/4/2024	BBK	Planning/preparing assignments for RBGG team for MPSJ and supporting docs; emailing team re same.	0.3	
9/4/2024	BBK	Conferring w/ DLE re deadlines related to omnibus sealing motion.	0.1	
9/4/2024	BBK	Conferring w/ JSY and GCG re GW comments on MPSJ.	0.1	
9/4/2024	BBK	Emailing w/ co-counsel and JSY re finalizing Mastin and Waters Decls ISO MPSJ.	0.1	
9/4/2024	BBK	Phone calls w/ JSY re preparing MPSJ and supporting pleadings.	0.3	
9/4/2024	BBK	Emailing w/ GW, TC, JSY, AHS and KES re preparing Cross Decl ISO MPSJ to attached Cross 26 Expert Report & updating BBK Decl and Exhibits accordingly.	0.7	
9/4/2024	BBK	Phone calls w/ KES and AHS re updating BBK Decl and Exhibits and Appendix A to sealing motion.	0.3	
9/4/2024	BBK	Reviewing/revising BBK Decl & Exs for MPSJ.	1.1	
9/4/2024	BBK	Reviewing M. Johnson revisions and comments on Mastin Decl ISO MPSJ; conferring w/ JSY and MJ re same.	0.5	
9/4/2024	BBK	Drafting Cross Decl ISO MPSJ.	0.3	
9/4/2024	BBK	Conferring w/ team re finalizing/executing Cross Decl.	0.2	
9/4/2024	BBK	Conferring w/ AHS re entering Mastin and Waters Decl citations to MPSJ.	0.4	
9/4/2024	BBK	Reviewing/revising KES draft Appendix A for sealing motion and index of exhibits for BBK Decl.	0.3	
9/4/2024	BBK	Reviewing/commenting on JSY draft proposed order granting MPSJ; conferring w/ JSY re same.	0.2	
9/4/2024	BBK	Conferring w/ JSY re next steps for finalizing MPSJ and supporting docs.	0.4	
9/4/2024	BBK	Phone calls w/ GW re MPSJ.	0.2	
9/4/2024	BBK	Comm'ns w/ KES, DLE, and JSY re finalizing BBK Decl and Exhibits (both public and under seal versions).	0.2	
9/4/2024	BBK	Reviewing GW proposed additions to proposed order granting MPSJ; emailing w/ GCG/JSY re same.	0.1	
9/4/2024	BBK	Revising MPSJ (including incorporating GW edits and AHS expert citations and making further revisions).	7.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/4/2024	BBK	Updating filing checklist for MPSJ; emailing RBGG team re same.	0.2	
9/4/2024	AHS	Emailed with BBK and team re next steps for MPSJ and BBK Decl.	0.3	
9/4/2024	AHS	Updated internal case tasks list.	0.3	
9/4/2024	AHS	Emailed with team and talked to BBK and KS re updating declaration and brief based on changes to expert decls and exhibits.	0.7	
9/4/2024	AHS	Updated MPSJ with citations to Waters declaration.	1.6	
9/4/2024	AHS	Reviewed emails with co-counsel re expert decls ISO MPSJ, and emails with opposing counsel.	0.7	
9/4/2024	AHS	Updated MPSJ with citations to Waters declaration.	1.4	
9/4/2024	BM	Draft administrative motion to consider whether to file Defendants' designated materials under seal, and accompanying proposed order, in connection with motion for partial summary judgment.	2.3	
9/4/2024	BM	Finalized administrative motion to consider whether to file Defendants' designated materials under seal, and accompanying proposed order, in connection with motion for partial summary judgment, after JSY review.	0.4	
9/4/2024	KES	Review MPSJ exhibits and determine potential sealing requirement for each; review prior court orders re sealing; update appendix A re same.	2.8	
9/4/2024	KES	Create Sharefiles with documents for Waters and Mastin declarations.	0.4	
9/4/2024	KES	Finalize redacted and unredacted sets of exhibits to BBK declaration in support of MPSJ.	3.2	
9/4/2024	KES	Emails with team re signed Cross declaration and supervise finalization of sealed and redacted version.	0.3	
9/4/2024	DLE	Save and circulate filed pleadings; calendar new deadlines re same.	0.2	
9/4/2024	DLE	Incorporate AHS edits to draft response to class member and send message.	0.2	
9/4/2024	DLE	Finalize exhibits for MPSJ; confer with KES.	2.1	
9/5/2024	GCG	Conf with and texts JSY re Barchuk deposition defense.	0.2	
9/5/2024	GCG	Emails JSY-GW-MJ re expert costs.	0.1	
9/5/2024	GCG	Confs with and emails JSY and BBK re revisions to proposed order and plan for MSJ filing.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/5/2024	GCG	Emails GW-team re same.	0.1	
9/5/2024	GCG	Review and revise agenda for co-counsel meeting.	0.1	
9/5/2024	JSY	Multiple emails and conf. re MPSJ; edit docs re same.	1.2	
9/5/2024	JSY	Emails re Opp to Defs' MSJ.	0.1	
9/5/2024	JSY	AB depo.	5.3	
9/5/2024	JSY	Draft summary of AB depo; emails re same.	0.5	
9/5/2024	JSY	Conf. w/ GCG re AB depo.	0.2	
9/5/2024	JSY	Prep for AB depo.	0.5	
9/5/2024	JSY	Emails re MSJ.	0.1	
9/5/2024	JSY	Draft agenda for team meeting; emails re same.	0.3	
9/5/2024	JSY	Emails re expert invoices.	0.1	
9/5/2024	BBK	Conferring w/ RBGG team re meeting to plan Opp to Ds' MPSJ on 9/6.	0.1	
9/5/2024	BBK	Conferring w/ JSY/GCG re co-counsel's proposed additions to proposed order granting MPSJ; conferring w/ co-counsel re same.	0.4	
9/5/2024	BBK	Drafting additions/revisions to proposed order granting MPSJ to incorporate all barriers.	2.8	
9/5/2024	BBK	Conferring w/ CG and JSY re finalizing proposed order granting MPSJ; reviewing/approving same.	0.4	
9/5/2024	BBK	Conferring w/ KES/JSY/AHS/BM re revising Admin Sealing Motion and Proposed Order to be consistent w/ Stipulation re Omnibus Sealing Motion.	0.5	
9/5/2024	BBK	Further revisions to MPSJ (including incorporating additional revisions by GW and final proof-read).	2.8	
9/5/2024	BBK	Conferring w/ CG and JSY re preparing TOC/TOA for brief and finalizing same; reviewing/approving same.	0.3	
9/5/2024	BBK	Phone call w/ GW re MPSJ.	0.2	
9/5/2024	BBK	Reviewing JSY summary of Barchuk deposition; emails w/ M Johnson re same.	0.1	
9/5/2024	BBK	Final review of MPSJ and supporting docs prior to filing.	0.3	
9/5/2024	BBK	Filing MPSJ and supporting docs.	0.6	
9/5/2024	BBK	Reviewing JSY proposed agenda for 9/6 co-counsel meeting.	0.1	
9/5/2024	AHS	Emailed with team and scheduled meeting to plan for opp to Defs' MSJ.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 997

SERVICES

Date	Person	Description of Services	Hours	Discount
9/5/2024	AHS	Met with KS to discuss MPSJ tasks.	0.2	
9/5/2024	AHS	Discussed admin motion to seal issue with BM and emailed team.	0.8	
9/5/2024	AHS	Revised admin mot to seal and proposed order.	0.8	
9/5/2024	AHS	Reviewed team e-mails re: deposition and MPSJ.	0.2	
9/5/2024	BM	Call with AHS to discuss recommendation for next steps on administrative motion to consider whether to file under seal Defendants' designated materials in support of motion for partial summary judgment.	0.3	
9/5/2024	BM	Revise administrative motion to consider whether to file under seal Defendants' designated materials in support of motion for partial summary judgment based on BBK and JSY feedback.	0.9	
9/5/2024	BM	Draft email to team with recommendation for next steps on administrative motion to consider whether to file under seal Defendants' designated materials in support of motion for partial summary judgment.	0.3	
9/5/2024	KES	Review and finalize appendix A to admin motion to seal ISO MPSJ and confer team re confidentiality issues for same.	1.7	
9/5/2024	KES	Update calendar deadline.	0.1	
9/5/2024	KES	Efile MPSJ and related Admin Motion to Seal; create Sharefile and serve under seal documents re same; email Proposed Orders to court re same.	0.9	
9/5/2024	KES	Review and check all final documents for MPSJ and confer team re same.	2.6	
9/5/2024	DLE	Save and circulate filed pleadings.	0.2	
9/6/2024	GCG	Review and analyze defendants' motion for summary judgment.	0.4	
9/6/2024	GCG	Meet w/ RBGG team to plan opposition briefing.	0.9	
9/6/2024	GCG	Meet w/ co-counseling team re same and re trial preparation tasks.	0.8	
9/6/2024	GCG	Conf w/ HF re trial.	0.1	
9/6/2024	GCG	Email to team re same.	0.1	
9/6/2024	JSY	Meeting with RBGG team re Opp to Defs' MSJ.	0.8	
9/6/2024	JSY	Review Defs' MSJ; draft notes re Opp.; emails re same.	1.6	
9/6/2024	JSY	Team meeting.	1.0	
9/6/2024	JSY	Emails re tasks re Opp to MSJ.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 998

SERVICES

Date	Person	Description of Services	Hours	Discount
9/6/2024	JSY	Emails re depos.	0.1	
9/6/2024	BBK	Emailing w/ team re Ds' Motion for Summary Judgment.	0.2	
9/6/2024	BBK	Reviewing Ds' Motion for Summary Judgment.	0.6	
9/6/2024	BBK	Meeting w/ RBGG team re plan for opposing Ds' Motion for Summary Judgment.	0.8	
9/6/2024	BBK	Reviewing/reporting to team re inadmissibility of Ds' expert reports submitted as evidence w/ Ds' Motion for Summary Judgment.	0.2	
9/6/2024	BBK	Co-counsel meeting re: opposing Ds' Motion for Summary Judgment and other immediate case tasks.	1.1	
9/6/2024	BBK	Reviewing T. Close's prior research re regulations applicable to BD's transportation services for opposition to Motion for Summary Judgment.	0.2	
9/6/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions and Omole deposition; emailing w/ team re same.	0.2	
9/6/2024	BBK	Reviewing/revising AHS case task list.	0.1	
9/6/2024	BBK	Conferring w/ JSY re assigning KES to analyze deposition testimony and class member decls relevant to emergency evacuation claims for Opp to Ds' MSJ.	0.1	
9/6/2024	BBK	Reviewing T. Close report re Kiles deposition.	0.1	
9/6/2024	AHS	Met with JY GCG BBK BM to discuss Defendants' motion for summary judgment and plan for opposition.	0.8	
9/6/2024	AHS	Read Defendants' MSJ.	1.8	
9/6/2024	AHS	Attended weekly meeting with cocounsel and GCG BM BBK KS DLE to discuss upcoming deadliens and MSJ briefing.	1.1	
9/6/2024	AHS	Emailed named plaintiffs with case update including attaching MPSJ.	0.5	
9/6/2024	AHS	Updated and circulated internal case tasks list.	0.4	
9/6/2024	AHS	Discussed case with DLE.	0.3	
9/6/2024	AHS	Read summary of deposition of June Kailes.	0.2	
9/6/2024	BM	Attend team meeting to discuss tasks related to Plaintiffs' upcoming opposition to Defendants' motion for summary judgment.	0.8	
9/6/2024	BM	Weekly meeting with co-counsel to discuss status of case and pending action items.	1.1	
9/6/2024	BM	Review Defendants' Motion for Summary Judgment.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 999

SERVICES

Date	Person	Description of Services	Hours	Discount
9/6/2024	BM	Conduct legal research in connection with mootness section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment.	0.9	
9/6/2024	KES	Assist with downloading voluminous pleadings filed by Defs in support of their MSJ and cross-reference unidentified ECF numbers with under seal documents; download and organize under seal filings served by Defs.	2.6	
9/6/2024	KES	Update case TextMap to include BM and AS.	0.3	
9/6/2024	KES	Email co-counsel re documents served under seal.	0.1	
9/6/2024	KES	Update client communications memo.	0.2	
9/6/2024	KES	Co-counsel meeting re summary judgment, opp and discovery.	1.0	
9/6/2024	DLE	Save and circulate filed pleadings from defendants' summary judgment motion.	0.9	
9/6/2024	DLE	Attend and note-take meeting with co-counsel.	1.0	
9/6/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.3	
9/7/2024	GCG	Review BBK and TC analysis of DOJ issue and 16 passenger buses.	0.1	
9/7/2024	GCG	Review MJ, ER and BBK emails re upcoming depositions.	0.1	
9/9/2024	GCG	Confs w/ JSY re opposition to motion for SJ and plan for jury consultant.	0.2	
9/9/2024	GCG	Email to JSY and MJ re Judge Beeler discovery order.	0.1	
9/9/2024	GCG	Conf w/ BBK re FSP portion of defendants' MSJ.	0.1	
9/9/2024	GCG	Emails to BM, AS and team re pre-trial research projects.	0.1	
9/9/2024	GCG	Email to BU and GW re Flores.	0.1	
9/9/2024	JSY	Conf. w/ BBK re Opp to MSJ.	0.3	
9/9/2024	JSY	Emails re transcript.	0.1	
9/9/2024	JSY	Emails re emergency evacuation issues; research same.	0.3	
9/9/2024	JSY	Conf. w/ BBK re Opp re MSJ.	0.4	
9/9/2024	JSY	Conf. w/ Opp re MSJ.	0.1	
9/9/2024	JSY	Review emails re FSP issues for MSJ Opp.	0.2	
9/9/2024	JSY	Conf. w/ GCG re jury consultants and fact motion to compel deadline; emails re same.	0.4	
9/9/2024	JSY	Emails re fact gathering for MSJ opp.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1000

SERVICES

Date	Person	Description of Services	Hours	Discount
9/9/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions.	0.1	
9/9/2024	BBK	Emailing w/ AHS re Cross deposition.	0.1	
9/9/2024	BBK	Reviewing/responding to GCG query re status of identifying additional class representatives for Brookhurst sub-class; reviewing AHS and BM responses to GCG queries re status of outreach to former San Ramon ED and legal research on use of videotaped deposition at trial.	0.2	
9/9/2024	BBK	Phone call w/ JSY re strategy/plan for preparing Opp to Ds' MSJ.	0.3	
9/9/2024	BBK	Analyzing Ds' improperly filed exhibits to MSJ; conferring w/ RBGG team re same.	0.2	
9/9/2024	BBK	Phone call w/ GCG re strategy for Opposition to Ds' MSJ.	0.2	
9/9/2024	BBK	Emailing w/ RBGG team re legal research into ADA requirements related to emergency evacuation planning.	0.1	
9/9/2024	BBK	Analyzing Part III of Ds' MSJ and planning Pls' Opp to same.	1.4	
9/9/2024	BBK	Emails w/ KES re analysis of deposition testimony re emergency evacuation ADA claims.	0.1	
9/9/2024	BBK	Analyzing Ds' arguments re: DOT regulations applicability to FSP in MSJ.	0.5	
9/9/2024	BBK	Drafting email to G. Wallace and T. Close re addressing Ds' position on DOT regulation applicability to FSP; reviewing/responding to G. Wallace re same.	0.5	
9/9/2024	BBK	Reviewing T. Close emails re Pls' position on applicability of DOT regs to FSP and Brookdale's fleet.	0.2	
9/9/2024	BBK	Phone call w/ JSY re responding to Ds' MSJ argument re DOT regulation applicability to BD and its FSP.	0.4	
9/9/2024	BBK	Analyzing regulations and regulatory guidances cited by T. Close re interplay of DOT regulations; conducting further analysis re Pls' position on same.	1.1	
9/9/2024	BBK	Reviewing MJ Beeler Order re Motion for EOT for discovery motions on disputes over fact discovery; emailing w/ JSY and co-counsel re same.	0.1	
9/9/2024	BBK	Reviewing AHS analysis re standing for potential additional Brookhurst class reps.	0.1	
9/9/2024	AHS	Emailed with BBK re case tasks list and edited same.	0.4	
9/9/2024	AHS	Emailed team status of various tasks in response to GCG inquiry.	0.3	
9/9/2024	AHS	Researched standing for section of MSJ Opp.	4.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
9/9/2024	BM	Conduct additional legal research on the use of videotaped deposition testimony during trial.	1.4	
9/9/2024	BM	Draft email memorandum summarizing legal research on the use of videotaped deposition testimony during trial.	3.9	
9/9/2024	BM	Draft section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment focused on mootness argument related to the Fleet Safety Policy.	0.5	
9/9/2024	KES	Review and circulate order and calendar deadline.	0.2	
9/9/2024	KES	Resolve Defs MSJ pleadings under seal and public status and correct ECF numbers re same.	0.4	
9/9/2024	KES	Review and gather testimony re emergency evacuation including excerpts from Plaintiff witness deposition and declarations.	3.7	
9/9/2024	KES	Review NOD and calendar depo date.	0.1	
9/10/2024	GCG	Conf w/ and email to JSY re opposition to MSJ and reply ISO motion to decertify.	0.2	
9/10/2024	JSY	Emails re jury consultants.	0.2	
9/10/2024	JSY	Conf. w/ GCG re expert depos and Reply ISO motion to certify for interlocutory appeal; emails re same.	0.2	
9/10/2024	JSY	Conf. w/ BM and KES re tasks for Opp to MSJ.	0.3	
9/10/2024	JSY	Emails re AB transcript.	0.2	
9/10/2024	JSY	Review materials re Defs' MSJ and emails and conf. re Opp.	1.1	
9/10/2024	JSY	Emails re contact from putative class member.	0.1	
9/10/2024	JSY	Emails re redactions to Reply re motion to decertify; review same; conf. w/ BBK re same.	0.8	
9/10/2024	JSY	Emails re exhibits to support Defs' Reply re Motion to Decertify.	0.1	
9/10/2024	BBK	Conferring w/ T. Close and G. Wallace re meeting on strategy for responding to Ds' MSJ regulatory arguments re: FSP-related claims.	0.2	
9/10/2024	BBK	Drafting email to RBGG team re standing and class definition issues for potential additional class reps for Brookhurst facility-specific access barrier claims.	0.3	
9/10/2024	BBK	Reviewing emails w/ opposing counsel re expert depositions.	0.1	
9/10/2024	BBK	Reviewing/responding to T. Close email re case law for opposing Ds' MSJ on emergency evacuation claims.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/10/2024	BBK	Emailing w/ BM re legal research on use of videotaped deposition testimony at trial.	0.1	
9/10/2024	BBK	Conducting analysis of DOT regs and guidance and drafting proposed framework of response to Ds' MSJ regulatory arguments re: FSP-related claims.	2.8	
9/10/2024	BBK	Emailing w/ G. Wallace and T. Close re proposed framework of response to Ds' MSJ regulatory arguments re: FSP-related claims.	0.2	
9/10/2024	BBK	Conferring w/ JSY re Kennedy deposition and preparing Opp to Ds' MSJ.	0.3	
9/10/2024	BBK	Conferring w/ JSY and GCG re plan for Reply ISO Pls' MPSJ.	0.1	
9/10/2024	BBK	Emailing w/ G. Wallace re Reply ISO Certification of Interlocutory Appeal.	0.1	
9/10/2024	BBK	Conferring w/ KES and JSY re responding to PC from daughter of former BD resident.	0.2	
9/10/2024	BBK	Drafting email to daughter of former BD resident.	0.3	
9/10/2024	BBK	Emailing w/ JSY and co-counsel re responding to Ds' request that Pls stipulate to redactions to docs Ds will file ISO their Reply ISO Motion to Decertify Classes.	0.2	
9/10/2024	BBK	Conferring w/ JSY re reviewing unredacted docs shared by M. Jacobsen and whether to stipulate to redaction to some or all of same.	0.2	
9/10/2024	BBK	Conferring w/ KES and JSY re locating evidence to be submitted w/ Opp to Ds' MSJ.	0.2	
9/10/2024	BBK	Calendaring deadlines to respond to Ds' Admin Sealing Motion and to file Objections to Reply Evidence.	0.1	
9/10/2024	BBK	Reviewing M. Johnson's analysis re approach to responding to Ds' MSJ regulatory arguments re: FSP-related claims; emailing re same.	0.3	
9/10/2024	AHS	Reviewed with co-counsel and opposing counsel re depos and named platiniffs.	0.3	
9/10/2024	AHS	Researched standing for section of MSJ Opp.	3.3	
9/10/2024	AHS	Reviewed team e-mails and updated case tasks list.	0.3	
9/10/2024	BM	Draft email summarizing legal research on the use of videotaped deposition testimony during trial.	1.9	
9/10/2024	BM	Draft section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment focused on mootness argument related to the Fleet Safety Policy.	2.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/10/2024	BM	Conduct additional legal research in connection with section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment focused on mootness argument related to the Fleet Safety Policy.	1.2	
9/10/2024	KES	TC with relative of former BKD resident and follow up emails with team re same.	0.5	
9/10/2024	KES	Download and organize Barchuk transcript and create Sharefile to send to expert.	0.4	
9/10/2024	KES	Download and organize Allen depo transcript and upload to TextMap.	0.3	
9/10/2024	KES	Download and organize updated exhibit package from court reporting service.	0.2	
9/10/2024	KES	Calendar expert depos.	0.1	
9/10/2024	KES	Download documents served by Defs re proposed redactions.	0.2	
9/10/2024	KES	Gather additional previously filed documents related to emergency evacuations and excerpt declaration testimony from witness declarations re evacuations in connection with MSJ opposition.	2.7	
9/10/2024	KES	Review and organize additional materials related to issues for MSJ opposition.	0.8	
9/11/2024	GCG	Conf w/ JSY re interlocutory appeal brief.	0.2	
9/11/2024	JSY	Review Defs' Reply re Motion to Decertify; emails re evidence re same.	0.3	
9/11/2024	JSY	Review Reply re motion to certify for interlocutory appeal; emails re same.	0.3	
9/11/2024	JSY	Review memo re use of video tape testimony; emails re same.	0.3	
9/11/2024	JSY	Emails re objections to reply evidence; research same; draft same.	0.7	
9/11/2024	JSY	Conf. w/ GCG re caption; emails re same.	0.3	
9/11/2024	JSY	Emails re Opp to MSJ projects.	0.1	
9/11/2024	BBK	Reviewing/analyzing Ds' Reply ISO Motion to Decertify Facility-Based Subclasses.	0.3	
9/11/2024	BBK	Further emails w/ M. Johnson re approach to responding to Ds' MSJ regulatory argument re Pls' transportation claims.	0.2	
9/11/2024	BBK	Emailing w/ JSY and co-counsel re whether to file Objections to Reply Evidence submitted by Ds ISO Motion to Decertify.	0.2	
9/11/2024	BBK	Planning/preparing Opp to Ds' MSJ.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/11/2024	BBK	Conferring w/ JSY and KES re drafting Objections to Reply Evidence and exemplars of same.	0.2	
9/11/2024	BBK	Emails w/ JSY and G. Wallace re Pls' Reply ISO Motion for Interlocutory Appeal.	0.1	
9/11/2024	BBK	Reviewing JSY and AHS comments on BM legal research re videotaped depositions at trial and strategy.	0.1	
9/11/2024	BBK	Drafting proposal to JSY re additional evidence to gather for Opp to Ds' MSJ arguments re: applicability of Title III to resident rooms.	0.4	
9/11/2024	BBK	Drafting/sending assignment to KES to gather evidence for Opp to Ds' MSJ arguments re: applicability of Title III to resident rooms.	0.2	
9/11/2024	AHS	Reviewed e-mails from opposing counsel and cocounsel re document redactions and ongoing briefing.	0.3	
9/11/2024	AHS	Outlined section of MSJ Opp in response to Defs Section VI.	0.3	
9/11/2024	AHS	Emailed with JY and BM re standing.	0.2	
9/11/2024	AHS	Reviewed draft reply ISO mot to certify order for interlocutory review.	0.2	
9/11/2024	BM	Draft section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment focused on mootness argument related to the Fleet Safety Policy.	5.4	
9/11/2024	KES	Review and code transcripts and create reports re medical services provided by Brookdale in connection with summary judgment.	4.0	
9/11/2024	KES	Organize under seal exhibits.	0.2	
9/11/2024	KES	Review next assignment for opp to Defs MSJ.	0.2	
9/11/2024	DLE	Save and circulate filed pleadings.	0.4	
9/12/2024	JSY	Emails re objections to Defs' Reply evidence; research same.	0.4	
9/12/2024	JSY	Emails re joint submission re fact discovery.	0.1	
9/12/2024	JSY	Research re Opp to MSJ; review evidence re same; emails re same.	1.3	
9/12/2024	JSY	Meeting re Opp to MSJ.	1.0	
9/12/2024	JSY	Emails re Opp to MSJ.	0.2	
9/12/2024	JSY	Emails re MSJ Opp.	0.3	
9/12/2024	JSY	Emails re jury consultant.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/12/2024	BBK	Emails w/ co-counsel and JSY re Objections to Reply Evidence submitted ISO Motion to Decertify.	0.1	
9/12/2024	BBK	Conferring w/ JSY re Reply ISO Motion to Certify Interlocutory Appeal and re evidence ISO Opp to MSJ.	0.2	
9/12/2024	BBK	Reviewing/revising/commenting on Reply ISO Motion to Certify Interlocutory Appeal.	0.7	
9/12/2024	BBK	Reviewing emails w/ co-counsel and OC re joint statement to MJ Beeler re discovery and re: stipulating to EOT to file same.	0.2	
9/12/2024	BBK	Reviewing emails w/ co-counsel and OC re stipulating to allow 3 remaining expert depositions to be taken after close of discovery.	0.2	
9/12/2024	BBK	Planning/preparing Opp to MSJ.	0.5	
9/12/2024	BBK	Emailing w/ JSY/AHS/BM re draft sections for Opp to Ds MSJ.	0.2	
9/12/2024	BBK	Conferring w/ KES re analysis of evidence for Opp to Ds' MSJ.	0.1	
9/12/2024	BBK	Meeting w/ JSY/AHS/BM re preparing Opp to Ds' MSJ.	1.0	
9/12/2024	BBK	Emailing w/ JSY and GW re drafting sections of Opp to Ds' MSJ.	0.1	
9/12/2024	BBK	Identifying/sending legal research to BM re applicability of Title II case law in Title III cases.	0.2	
9/12/2024	BBK	Reviewing AHS draft insert to Opp to Ds' MSJ re Algarme standing.	0.2	
9/12/2024	AH	(Billing Judgment) Research re case law for opp to Defendants' MSJ; confer wtih JY BM re same.	0.0	0.3
9/12/2024	AHS	Drafted section of MSJ Opp responding to Defs' section VI re: Algarme's standing.	6.3	
9/12/2024	AHS	Met with JY BBK BM to discuss next steps for MSJ Opp.	1.0	
9/12/2024	BM	Meeting with JSY, BBK, and AHS to discuss status of drafting Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	1.0	
9/12/2024	BM	Draft section of Plaintiffs' opposition to Defendants' Motion for Summary Judgment focused on mootness argument related to the Fleet Safety Policy.	2.0	
9/12/2024	BM	Conduct legal research regarding ADA Title III case law regarding emergency evacuation plans in connection with Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	2.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/12/2024	BM	Review expert materials from JK regarding emergency evacuation plans at Brookdale in connection with Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	0.9	
9/12/2024	KES	Download and circulate pleadings and calculate depo dates.	0.3	
9/12/2024	KES	Review and code plaintiff depositions in TextMap for issues relating to summary judgment.	3.5	
9/13/2024	GCG	Prepare for and conduct meeting with Schneider Wallace team re motion objections and other pre-trial tasks.	1.1	
9/13/2024	GCG	Meet with RBGG team re opposition to summary judgment.	0.1	
9/13/2024	GCG	Conf with and email JSY re same.	0.2	
9/13/2024	GCG	Email with JSY re meeting with jury consultant.	0.1	
9/13/2024	JSY	Emails re meeting with jury consultant.	0.2	
9/13/2024	JSY	Conf. w/ GCG re MSJ Opp.	0.1	
9/13/2024	JSY	Emails re notice of appearance.	0.1	
9/13/2024	JSY	Emails and conf. re MSJ Opp.	0.4	
9/13/2024	JSY	Team meeting.	1.1	
9/13/2024	JSY	Meeting with RBGG only team re MSJ Opp and objections to Reply evidence; conf. w/ GCG re same.	0.2	
9/13/2024	JSY	Emails re NOA.	0.1	
9/13/2024	JSY	Emails re agenda for team meeting.	0.1	
9/13/2024	JSY	Emails re evidence for Opp to MSJ.	0.5	
9/13/2024	JSY	Draft Objections to Reply evidence.	1.3	
9/13/2024	BBK	Conferring w/ RBGG team re Ds' failure to comply w/ Court Order to correct its filing of under seal exhibits in support of MSJ.	0.1	
9/13/2024	BBK	Reviewing Court Orders granting Stipulations re EOT to file discovery status statement and to allow expert depositions to occur after close of expert discovery; conferring w/ RBGG team re same.	0.1	
9/13/2024	BBK	Emailing w/ BM, JSY, KJJ, MSN and T Close re legal research on ADA reqs for emergency evacuation planning.	0.2	
9/13/2024	BBK	Meeting w/ JSY re plan for Opp to MSJ.	0.4	
9/13/2024	BBK	Preparing BBK notes and analysis into outline and tasklist for Opp to MSJ Section on Title III applicability to BD's resident rooms.	0.8	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
9/13/2024	BBK	Emailing w/ JSY and AHS re Opp to MSJ Section on Title III applicability to BD's resident rooms.	0.2	
9/13/2024	BBK	Emailing w/ co-counsel and JSY re plan for Objections to Reply Evidence ISO Ds' Motion to Decertify Classes.	0.2	
9/13/2024	BBK	Analyzing Ds' MSJ Sections I.B and II to plan/prepare opposition to same.	1.5	
9/13/2024	BBK	Emailing w/ KES re Kennedy Rule 26 expert report.	0.1	
9/13/2024	BBK	Meeting w/ co-counsel re immediate case tasks and debrief w/ RBGG team re same.	1.2	
9/13/2024	BBK	Drafting filing checklist and tasklist for Opp to Ds' MSJ.	0.3	
9/13/2024	BBK	Emails w/ KES re preparing memo w/ all named Pls' resident rooms for Opp to MSJ.	0.3	
9/13/2024	BBK	Reviewing M. Johnson emails to opposing counsel requesting to stipulate to 1-week extension for Daubert Motion and proposing postponement of Omole deposition for bifurcated staffing claims.	0.1	
9/13/2024	BBK	Emailing w/ JSY and AHS re revisions to Opp to MSJ Section re Algarme Standing.	0.1	
9/13/2024	BBK	Conferring w/ JSY, GW, Jeff Mastin and Gary Waters re meeting on readily achievable barrier removal of barriers encountered by named Pls.	0.2	
9/13/2024	BBK	Reviewing/revising AHS updated case tasklist.	0.2	
9/13/2024	BBK	Conferring w/ JSY re M. Johnson - G. Waters emails re applicability of readily achievable barrier removal standards to named Pls' claims.	0.3	
9/13/2024	BBK	Emails w/ JSY and T Close re Kailes Decl ISO Opp to Ds' MSJ.	0.1	
9/13/2024	KJJ	(Billing Judgment) Quick research re: title III and Emergency preparedness, respond to email inquiry from JSY re: same.	0.0	0.3
9/13/2024	AHS	Compared internal pre-trial calendar with co-counsel's and flagged discrepancies.	0.5	
9/13/2024	AHS	Discussed upcoming work and trial schedule with DLE.	0.5	
9/13/2024	AHS	Emailed with team re response to defs' MSJ and approach to section III.	0.4	
9/13/2024	AHS	Attended weekly meeting with co-counsel and BBK JY GCG KS BM DLE.	1.2	
9/13/2024	AHS	Updated section of MSJ Opp on Algarme's standing with cites to rog responses.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/13/2024	AHS	Reviewed e-mails with team and co-counsel re documents and strategy.	0.5	
9/13/2024	BM	Weekly meeting with co-counsel to discuss case status and pending action items.	1.1	
9/13/2024	BM	Review expert materials from JK regarding emergency evacuation plans at Brookdale in connection with Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	1.5	
9/13/2024	BM	Review deposition excerpts and other factual record cites in connection with drafting section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment on emergency evacuation planning.	1.3	
9/13/2024	KES	Zoom meeting with co-counsel re summary judgment opp.	1.1	
9/13/2024	KES	Download Kailes transcript and upload to TextMap.	0.2	
9/13/2024	KES	Draft notice of change in counsel.	0.3	
9/13/2024	KES	Update expert files.	0.1	
9/13/2024	KES	Review interrogatories responses and documents and create chart of client BKD room history; compare information with that from R. Steyer.	1.7	
9/13/2024	DLE	Attend and note-take meeting with co-counsel and firm-only debrief.	1.3	
9/13/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.3	
9/13/2024	DLE	Save and circulate filed pleadings; calendar new deadlines re same.	0.5	
9/14/2024	GCG	Review and analyze defendants' reply ISO de-certification.	0.5	
9/14/2024	GCG	Review and review plaintiffs' objections to reply evidence.	0.5	
9/14/2024	GCG	Conf with JSY and emails GW-MJ-JSY re same and re preparation for oral argument.	0.4	
9/14/2024	JSY	Draft objections to Reply evidence; emails re same.	2.9	
9/14/2024	JSY	Conf. w/ GCG re objections.	0.1	
9/14/2024	BBK	Reviewing JSY draft Objections to Reply Evidence and GW revisions to same; emailing w/ team re same.	0.2	
9/14/2024	BBK	Reviewing M Johnson comments on draft Objections to Reply Evidence; emailing w/ JSY re same.	0.1	
9/15/2024	GCG	Email with JSY re further objections to replay evidence.	0.1	
9/15/2024	JSY	Emails re objections to reply evidence.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/15/2024	BBK	Further emails w/ co-counsel and GCG/JSY re Objections to Reply Evidence.	0.1	
9/16/2024	GCG	Review and revise settlement demand letter.	1.0	
9/16/2024	GCG	Conf with GW re same.	0.2	
9/16/2024	GCG	Review and revise joint discovery statement.	0.3	
9/16/2024	GCG	Conf with JSY and email GW re same.	0.2	
9/16/2024	GCG	Email JSY re objection.	0.1	
9/16/2024	GCG	Conf with JSY re opposition to MSJ and trial preparation.	0.2	
9/16/2024	JSY	Edit reply objections brief; conf. and emails re same.	1.2	
9/16/2024	JSY	Review draft settlement letter; emails re same.	0.2	
9/16/2024	JSY	Conf. w/ GCG re settlement demand.	0.1	
9/16/2024	JSY	Conf. w/ GCG re reply evidence objections.	0.1	
9/16/2024	JSY	Emails re update to MJ Beeler.	0.1	
9/16/2024	JSY	Emails re Opp to MSJ progress.	0.1	
9/16/2024	BBK	Reviewing emails from co-counsel re deposition transcripts for Cross and Saad depositions.	0.1	
9/16/2024	BBK	Reviewing JSY's revised Objections to Reply Evidence; emails w/ GCG and co-counsel re finalizing/filing same.	0.1	
9/16/2024	BBK	Meeting w/ G. Wallace, J. Mastin and G. Waters re expert decls ISO Opp to MSJ.	0.5	
9/16/2024	BBK	Emailing materials to GW, J Mastin and G Waters for decls ISO MSJ Opp.	0.2	
9/16/2024	BBK	Reviewing Ds' revised section of joint statement re discovery ordered by MJ Beeler and Ds' section of same; emailing w/ co-counsel re same.	0.2	
9/16/2024	BBK	Conducting legal research for section of Opp to MSJ re successor liability for barriers in newly constructed facilities.	5.1	
9/16/2024	BBK	Phone call and email w/ G. Wallace re successor liability for owners/operators of newly constructed facilities.	0.2	
9/16/2024	BBK	Drafting section of MSJ Opp re successor liability for owners/operators of newly constructed facilities.	2.4	
9/16/2024	AHS	Outlined response to section III of defs' MSJ.	3.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/16/2024	BM	Review deposition excerpts and other factual record cites in connection with drafting section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment on emergency evacuation planning.	2.3	
9/16/2024	BM	Draft section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment focused on Plaintiffs' emergency preparedness claims.	1.9	
9/16/2024	KES	Download and circulate Cross transcript and upload same to Textmap.	0.2	
9/16/2024	KES	Efile substitution of attorney.	0.2	
9/16/2024	KES	Review upcoming deadlines.	0.1	
9/16/2024	KES	Continue review and coding of depo transcripts for MSJ opp issues.	1.7	
9/17/2024	GCG	Emails with GW and conf JSY re ER objections to discovery pleading.	0.2	
9/17/2024	GCG	Conf with KES re trial preparation.	0.1	
9/17/2024	JSY	Conf. w/ GCG re status of projects incl. for Opp re MSJ.	0.1	
9/17/2024	JSY	Emails re Daubert deadline.	0.1	
9/17/2024	JSY	Finalize and file objections to Reply evidence; emails re same.	0.5	
9/17/2024	JSY	Prepare depo excerpts for Opp to MSJ; draft section re same.	1.9	
9/17/2024	JSY	Meeting re Opp to MSJ.	1.0	
9/17/2024	JSY	Review expert testimony for Opp re MSJ; emails re same.	0.9	
9/17/2024	BBK	Reviewing emails w/ opposing counsel re revising/filing joint statement re discovery status to MJ Beeler.	0.1	
9/17/2024	BBK	Reviewing opposing counsel email re: Pls' proposed week EOT for Daubert motion deadline and conferring w/ JSY and co-counsel re same.	0.1	
9/17/2024	BBK	Emailing w/ GW, Gary Waters and Jeff Mastin re preparing declarations ISO MSJ Opp.	0.2	
9/17/2024	BBK	Emailing w/ KES, JSY and AHS re identifying depo excerpts and other evidence for MSJ Opp.	0.2	
9/17/2024	BBK	Meeting w/ JSY, AHS and BM re preparing MSJ Opp and supporting docs.	0.9	
9/17/2024	BBK	Researching/drafting/revising section of MSJ Opp re subsequent owner liability for barrier removal and re readily achievable barrier removal.	6.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/17/2024	AHS	Conducted legal research for opposition to section III of Defs' MSJ.	0.3	
9/17/2024	AHS	Discussed assignments for MSJ Opp with DLE.	0.1	
9/17/2024	AHS	Drafted intro and medical treatment disputed facts section of MSJ Opp.	6.7	
9/17/2024	AHS	Met with JY BBK BM to discuss legal issues re: Opp to Defs' MSJ.	1.0	
9/17/2024	BM	Meeting with JSY, BBK, and AHS to discuss status of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	0.9	
9/17/2024	BM	Draft section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment focused on Plaintiffs' emergency preparedness claims.	4.6	
9/17/2024	KES	Confer team re review and coding of depo transcripts re issues for MSJ opp.	0.5	
9/17/2024	KES	Download and circulate pleadings.	0.2	
9/17/2024	KES	Consider tech for trial.	0.2	
9/17/2024	DLE	Code deposition transcripts of named plaintiffs for summary judgment opposition.	1.9	
9/18/2024	GCG	Meet with GW, JSY and SC re focus groups.	0.8	
9/18/2024	GCG	Review interlocutory appeal brief to prepare for court hearing.	0.2	
9/18/2024	GCG	Conf with JSY re preparation for opposition to summary judgment.	0.2	
9/18/2024	GCG	Email JSY re public injunction.	0.1	
9/18/2024	GCG	Follow up meeting to plan oral argument.	0.3	
9/18/2024	JSY	Emails and conf. re Opp to MSJ.	0.2	
9/18/2024	JSY	Meeting with SC re jury consulting.	0.7	
9/18/2024	JSY	Conf w/ GCG and GW re prep for hearing tomorrow.	0.4	
9/18/2024	JSY	Multiple conf and emails re Opp to MSJ.	0.6	
9/18/2024	JSY	Emails re jury consulting.	0.1	
9/18/2024	JSY	Research re McGill re decertification motion; emails re same.	1.0	
9/18/2024	BBK	Conferring w/ JSY re plan for MSJ Opp MPA.	0.1	
9/18/2024	BBK	Emails w/ G. Waters, J. Mastin and GW re Decls ISO MSJ Opp.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
9/18/2024	BBK	Emails w/ RBGG team and T. Close re evidence to submit w/ MSJ Opp.	0.2	
9/18/2024	BBK	Phone call w/ JSY re strategy for MSJ Opp.	0.3	
9/18/2024	BBK	Conferring w. G. Wallace re prep for hearing on motion to decertify facility-specific subclasses.	0.2	
9/18/2024	BBK	Reviewing Pls' settlement demand letter.	0.1	
9/18/2024	BBK	Researching/drafting MSJ Opp section re readily achievable barrier removal.	4.8	
9/18/2024	AHS	Drafted public accommodations section of Defs' MSJ.	7.3	
9/18/2024	BM	Draft section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment focused on Plaintiffs' emergency preparedness claims.	5.4	
9/18/2024	KES	Complete review and gather and organize support from depos and declarations re personal services.	4.8	
9/18/2024	DLE	Begin pulling and saving excerpts of depositions for exhibits to opposition for summary judgment.	1.4	
9/19/2024	GCG	Research and draft email to GW re oral argument on motion to de-certify.	0.2	
9/19/2024	GCG	(Reduced Charge) Travel to hearing on motions to decertify and for certification of interlocutory appeal.	0.5	0.5
9/19/2024	GCG	Follow up meeting with ER and co-counsel re discovery and Daubert issues.	0.3	
9/19/2024	GCG	Conf with JSY and email GW re bifurcation issues.	0.2	
9/19/2024	GCG	Conf with AS re trial schedule.	0.1	
9/19/2024	GCG	Participate in hearing on motions to decertify and for certification of interlocutory appeal.	0.9	
9/19/2024	JSY	Emails re hearing.	0.1	
9/19/2024	JSY	Emails and conf. re evidence for MSJ Opp.	0.2	
9/19/2024	JSY	(Reduced Charge) Travel to and from hearing on motions to decertify and to certify question for interlocutory appeal; post-hearing conf. w/ GBW, GCG, BU.	0.5	0.5
9/19/2024	JSY	Conf. w/ KES re issues with depo transcripts.	0.1	
9/19/2024	JSY	Emails re hearing and re Daubert motions and deadlines.	0.5	
9/19/2024	JSY	Emails re transcript.	0.1	
9/19/2024	JSY	Conf. w/ GCG re Daubert opp; emails re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1013

SERVICES

Date	Person	Description of Services	Hours	Discount
9/19/2024	JSY	Hearing on motions to decertify and to certify question for interlocutory appeal; post-hearing conf. w/ GBW, GCG, BU.	1.0	
9/19/2024	BBK	Reviewing emails from J. Mastin and G. Waters re Decls ISO MSJ Opp.	0.1	
9/19/2024	BBK	Emailing w/ KES re transcripts for Mastin and Flores depositions; reviewing emails w/ opposing counsel re Anderson deposition.	0.1	
9/19/2024	BBK	Emailing w/ RBGG team re evidence for MSJ Opp.	0.2	
9/19/2024	BBK	Researching/drafting MJS Opp section on readily achievable barrier removal.	3.1	
9/19/2024	BBK	Emailing w/ JSY re Daubert Motion deadline for staffing-related claims.	0.3	
9/19/2024	BBK	Emailing w/ JSY & co-counsel re Ds' position w/r/t EOT for Daubert Motions and necessity of M&Cing and filing Admin Motion for EOT.	0.2	
9/19/2024	BBK	Emailing w/ JSY re whether Pls' Unruh Act claims will be tried after class claims.	0.1	
9/19/2024	BBK	Reviewing JSY report re hearing on motion to decertify classes and on motion to certify interlocutory appeal; conferring w/ JSY re same.	0.1	
9/19/2024	BBK	Emailing w/ BM and AHS re draft MSJ Opp sections on emergency evacuation claims and on whether resident rooms qualify as places of public accommodation.	0.2	
9/19/2024	BBK	Drafting MSJ Opp Section of DOT regulations applicability to Brookdale.	5.0	
9/19/2024	AHS	Emailed team re record evidence for MSJ Opp.	0.4	
9/19/2024	AHS	Drafted section III of MSJ Opp re public accommodations.	10.4	
9/19/2024	AHS	Met with DLE re pulling specific fact information for subsection re: ADLs in public accomms section to MSJ Opp.	0.5	
9/19/2024	BM	Draft section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment focused on Plaintiffs' emergency preparedness claims.	5.4	
9/19/2024	BM	Draft section of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment focused on Plaintiffs' emergency preparedness claims.	1.2	
9/19/2024	KES	Draft and file transcript order form.	0.3	
9/19/2024	KES	Multiple emails with co-counsel and court reporters re depo transcripts; update files and TextMap with Flores transcript.	2.4	
9/19/2024	KES	Review upcoming case calendar and tasks.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/19/2024	KES	Confer AHS re evidence for personal services section.	0.2	
9/19/2024	KES	Review and gather exhibits for MSJ opp.	0.8	
9/19/2024	KES	Review summary of hearing.	0.1	
9/19/2024	DLE	Confer with AHS re legal writing project for opposition to summary judgment motion.	0.4	
9/19/2024	DLE	Draft paragraphs for opposition to summary judgment motion re in-room assistance with ADLs.	0.8	
9/19/2024	DLE	Search for depo transcript; confer with KES re issues.	0.2	
9/19/2024	DLE	Continue pulling and finalizing deposition citations to use as exhibits in summary judgment opposition.	1.4	
9/20/2024	GCG	RBGG meeting to discuss summary judgment briefing.	0.9	
9/20/2024	GCG	Confs with JSY and email BM re trial preparation and expert discovery.	0.2	
9/20/2024	GCG	Emails BBK-team re SJ exhibits and evidentiary objections.	0.4	
9/20/2024	JSY	Emails re Daubert opp dates and Kennedy depo stip; conf. w/ GCG re same.	0.3	
9/20/2024	JSY	Team meeting re opp to MSJ.	0.9	
9/20/2024	JSY	Emails and conf. re evidentiary objections to defs' MSJ evidence.	0.2	
9/20/2024	JSY	Messages and emails re MSJ opp; conf. w/ BBK re same.	0.3	
9/20/2024	JSY	Conf w/ BBK re MSJ Opp.	0.2	
9/20/2024	BBK	Emailing w/ AHS re draft MSJ Opp section re Title III applicability to resident rooms.	0.2	
9/20/2024	BBK	Emailing w/ RBGG team re evidence ISO MSJ Opp.	0.3	
9/20/2024	BBK	Meetings w/ JSY re MSJ Opp and supporting docs.	0.4	
9/20/2024	BBK	Emailing w/ JSY and BM re objections to Ds' evidence ISO MSJ.	0.1	
9/20/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re stipulation re Kennedy deposition and Daubert motion timing.	0.1	
9/20/2024	BBK	Meeting w/ RBGG team re preparing MSJ Opp.	0.9	
9/20/2024	BBK	Emailing w/ GW re preparing Mastin and Waters Decls ISO MSJ Opp.	0.1	
9/20/2024	BBK	Updating filing checklist for MSJ Opp.	0.1	
9/20/2024	BBK	Analyzing BM and AHS sections of MSJ Opp brief; drafting same.	6.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/20/2024	AHS	Communicated with team re next steps for drafting and fact identification re MSJ Opp.	0.4	
9/20/2024	AHS	Drafted section of MSJ Opp on so-called retroactive application of ADA.	5.7	
9/20/2024	AHS	Met with KS JY DLE GCG BBK re all components of and next steps for filing MSJ Opp.	1.0	
9/20/2024	AHS	Drafted section of MSJ Opp re defs' characterization of our pub accomm cases.	1.0	
9/20/2024	AHS	Drafted insert for MSJ Opp on tenants' rights and intersection with public accommodations law.	2.5	
9/20/2024	BM	Send email to KES and DLE with factual citations from Plaintiffs' Opposition to Defendants' Motion for Summary Judgment for exhibits to the Declaration of BBK in support of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	0.3	
9/20/2024	BM	Research upcoming federal civil jury trials in the Northern District of California for observation and send to GCG.	0.5	
9/20/2024	BM	Review documents and materials attached to Defendants' Motion for Summary Judgment and identify any possible evidentiary objections.	0.2	
9/20/2024	KES	Create chart of all Def MSJ pleadings and exhibits, detailing sealing status, and matching up with ECF Nos.	4.5	
9/20/2024	KES	Team check-in re MSJ opp.	0.3	
9/20/2024	KES	Continue review and gathering of documents and information for MSJ opp.	1.4	
9/20/2024	DLE	Attend and note-take internal meeting re opposition to summary judgment filing checklist.	1.0	
9/20/2024	DLE	Finalize and circulate notes from internal meeting.	0.2	
9/20/2024	DLE	Pull and finalize deposition excerpts to be used as exhibits in Plaintiffs' opposition to Defs' summary judgment motion.	2.1	
9/21/2024	JSY	Emails re MSJ Opp.	0.2	
9/21/2024	BBK	Emailing w/ RBGG team re plan for BBK Decl and Mastin/Waters Decls ISO MSJ Opp.	0.1	
9/21/2024	BBK	Emailing w/ G Waters re Decl ISO MSJ Opp.	0.1	
9/21/2024	BBK	Drafting MSJ Opp.	12.9	
9/21/2024	AHS	Pulled excerpts from PSPs, residency agreements, job descriptions, HWD manual for MSJ Opp.	2.2	
9/22/2024	GCG	Initial review of draft opposition to Defendants' MSJ.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/22/2024	GCG	Texts and emails with JSY re revision to same.	0.1	
9/22/2024	GCG	Email from GW re progress on his section of brief.	0.1	
9/22/2024	JSY	Review and edit Opp to MSJ; emails re same.	2.7	
9/22/2024	JSY	Further emails and messages re MSJ Opp.	0.2	
9/22/2024	BBK	Reviewing/responding to J. Mastin questions for Decl ISO MSJ Opp.	0.3	
9/22/2024	BBK	Analyzing JSY comments/revisions to draft MSJ Opp brief; emails re same.	0.8	
9/22/2024	BM	Review documents and materials attached to Defendants' Motion for Summary Judgment and identify any possible evidentiary objections.	3.8	
9/23/2024	GCG	Confs with JSY and emails JSY-BBK-team re research for and revisions to opposition to summary judgment.	0.2	
9/23/2024	GCG	Meet with co-counseling team to discuss same and supporting declarations.	0.5	
9/23/2024	GCG	Review and comment on BM section objecting to Defendants' evidence.	0.2	
9/23/2024	GCG	Review and revise draft opposition to motion for summary judgment.	0.5	
9/23/2024	JSY	Team meeting.	0.4	
9/23/2024	JSY	Review edits to MSJ Opp; emails re same.	0.2	
9/23/2024	JSY	Emails and conf. re evidentiary objections.	0.2	
9/23/2024	JSY	Draft JK decl re Opp to MSJ.	0.5	
9/23/2024	JSY	Draft stip re Daubert motions; emails and conf. re same.	0.6	
9/23/2024	JSY	Emails re Opp to MSJ.	0.2	
9/23/2024	JSY	Emails re stip re Daubert motions.	0.1	
9/23/2024	BBK	Conferring w/ AHS re preparing BBK Decl ISO MSJ Opp and identifying exhibits previously introduced by Ds' ISO MSJ and by Pls' ISO MPSJ.	0.3	
9/23/2024	BBK	Conferring w/ JSY re preparing Kailes Decl ISO MSJ Opp and Admin Sealing Motion for same.	0.1	
9/23/2024	BBK	Preparing Waters, Mastin and BBK Decls ISO MSJ Opp.	0.1	
9/23/2024	BBK	Reviewing BM report re potential evidentiary objections to Ds' evidence ISO MSJ.	0.1	
9/23/2024	BBK	Conferring w/ JSY and KES re inspection of Schmidt's resident room at BD Tracy.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
9/23/2024	BBK	Meeting w/ co-counsel re MSJ Opp prep.	0.4	
9/23/2024	BBK	Reviewing emails w/ opposing counsel re seeking extension of time on Daubert Motion and Opposition deadlines; emailing w/ JSY and co-counsel re same.	0.2	
9/23/2024	BBK	Emailing w/ G. Wallace re plan for Mastin & Waters Decls ISO MSJ.	0.1	
9/23/2024	BBK	Revising MSJ Opp (including incorporating JSY comments and reviewing/revising G. Wallace section, drafting introduction and intro to argument, and making cuts).	4.7	
9/23/2024	BBK	Emailing w/ RBGG team and co-counsel re revisions to MSJ Opp.	0.2	
9/23/2024	BBK	Conferring w/ RBGG team re preparing BBK Decl Exhibits for MSJ Opp.	0.2	
9/23/2024	BBK	Conferring w/ AHS, JSY and KES re preparing BBK Decl ISO MSJ Opp.	0.2	
9/23/2024	BBK	Emailing w/ GCG re draft MSJ Opp.	0.1	
9/23/2024	BBK	Planning/preparing Mastin Decl ISO MSJ Opp.	2.5	
9/23/2024	AHS	Drafted BBK decl ISO Opp to MSJ.	5.1	
9/23/2024	AHS	Emailed with team re: BBK Decl and questions and record evidence.	0.9	
9/23/2024	AHS	Meeting with co-counsel and BBK GCG JY DLE BM KS.	0.4	
9/23/2024	BM	Draft email to team regarding potential evidentiary objections to Defendants' Motion for Summary Judgment.	1.4	
9/23/2024	BM	Meeting with co-counsel to discuss case status and pending action items.	0.4	
9/23/2024	BM	Draft paragraph for brief regarding evidentiary objections to Defendants' Motion for Summary Judgment.	0.9	
9/23/2024	BM	Conduct legal research regarding evidentiary objections to Defendants' Motion for Summary Judgment.	1.1	
9/23/2024	KES	Co-counsel Zoom meeting re MSJ opp.	0.5	
9/23/2024	KES	Download and circulate order and calendar deadlines.	0.2	
9/23/2024	KES	Arrange for transcript payment.	0.2	
9/23/2024	KES	Organize final Mastin transcript in TextMap.	0.2	
9/23/2024	KES	Continue review and gathering of documents and information in connection with gathering evidence for opposition to MSJ.	4.0	
9/23/2024	DLE	Attend and note-take co-counsel meeting.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/23/2024	DLE	Finalize and circulate notes re: meeting with co-counsel.	0.2	
9/24/2024	GCG	Review and revise draft SJ opposition brief.	1.6	
9/24/2024	GCG	Confs with BBK and emails GW-team re same.	0.2	
9/24/2024	GCG	Review and analyze Defendants' settlement letter.	0.2	
9/24/2024	GCG	Email GW-team re same.	0.1	
9/24/2024	JSY	Emails re MSJ opp and Daubert deadline.	0.3	
9/24/2024	JSY	Emails re sealing pleadings for MSJ opp.	0.1	
9/24/2024	BBK	Emailing w/ R. Steyer re inspection of Schmidt's room at BD Tracy.	0.1	
9/24/2024	BBK	Emailing w/ co-counsel re proposed EOT for Daubert Motions and Oppositions.	0.1	
9/24/2024	BBK	Emails w/ AHS re preparing BBK Decl and Exhibits.	0.3	
9/24/2024	BBK	Phone call w/ G. Wallace re Mastin Decl ISO MSJ Opp.	0.1	
9/24/2024	BBK	Drafting Mastin Decl ISO MSJ Opp; revising per G. Wallace comments.	2.7	
9/24/2024	BBK	Phone calls w/ GCG re MSJ Opp revisions/comments.	0.3	
9/24/2024	BBK	Emailing w/ G. Wallace w/ MSJ Opp.	0.1	
9/24/2024	BBK	Drafting Waters Decl ISO MSJ Opp.	1.5	
9/24/2024	BBK	Emails w/ G. Wallace, G. Waters, and J. Mastin re declarations ISO MSJ Opp.	0.5	
9/24/2024	BBK	Revisions to MSJ Opp to incorporate GCG comments.	1.5	
9/24/2024	BBK	Conferring w/ KES and BM re locating 30(b)(6) depo excerpt to ID factual report for intentional refusal to comply w/ CBC.	0.2	
9/24/2024	BBK	Reviewing M. Johnson report re: Anderson Deposition; reviewing Ds' settlement counter-offer.	0.2	
9/24/2024	BBK	Conferring w/ JSY re status of MSJ Opp and supporting docs.	0.1	
9/24/2024	BBK	Further revisions to MSJ Opp.	1.0	
9/24/2024	BBK	Revising G. Waters and J. Mastin Decls ISO MSJ Opp to address their comments; emailing w/ G. Wallace re same.	0.8	
9/24/2024	BBK	Revising exhibits to G. Waters and J. Mastin Decls ISO MSJ Opp.	0.5	
9/24/2024	BBK	Updating filing checklist for MSJ Opp; emailing RBGG team re same.	0.2	
9/24/2024	AHS	Updated BBK Decl with medical records and job descriptions.	3.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/24/2024	AHS	Emailed with team re next steps for BBK declaration and deposition experts.	0.4	
9/24/2024	AHS	Reviewed potential medical record exhibits.	0.5	
9/24/2024	BM	Review Brookdale 30(b)(6) deposition testimony to identify excerpts to include in Plaintiffs' Opposition to Defendants' Motion for Summary Judgment with respect to California law on removal of access barriers.	0.9	
9/24/2024	KES	Continue review and gathering of information and documents for MSJ opp, including review of client medical records, updating depo excerpts, and review of transcripts.	4.0	
9/24/2024	KES	Send check with cover letter to court reporter for transcript.	0.3	
9/24/2024	KES	Update electronic files.	0.1	
9/25/2024	GCG	Research and draft letters to clients re Defendants' settlement offer and upcoming settlement conference.	0.6	
9/25/2024	GCG	Conf with JSY and emails GW re same.	0.2	
9/25/2024	GCG	Email with ER re principals' Zoom required by MJ Spero.	0.2	
9/25/2024	GCG	Conf with and emails JSY re MST opposition pleading.	0.2	
9/25/2024	JSY	Emails re Kailes decl.	0.1	
9/25/2024	JSY	Emails re MSJ opp meeting.	0.1	
9/25/2024	JSY	Conf. w/ GCG re Opp to MSJ and settlement offer.	0.2	
9/25/2024	JSY	Internal team meeting re Opp to MSJ.	0.6	
9/25/2024	JSY	Team meeting re Opp to MSJ and Daubert deadline.	0.2	
9/25/2024	JSY	Conf. w/ BBK re hearing re MSJ.	0.2	
9/25/2024	JSY	Emails re Kailes report.	0.1	
9/25/2024	JSY	Emails re Daubert deadline.	0.1	
9/25/2024	JSY	Prepare sealing pleadings for MSJ Opp.	0.5	
9/25/2024	JSY	Conf. w/ BBK re Opp to MSJ.	0.3	
9/25/2024	JSY	Conf. w/ GCG re settlement conference process.	0.1	
9/25/2024	JSY	Review and edit letter to plaintiffs.	0.1	
9/25/2024	JSY	Review and edit Opp to MSJ; emails re same.	1.1	
9/25/2024	JSY	Emails re Kailes decl.	0.1	
9/25/2024	JSY	Emails re Opp to MSJ.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/25/2024	BBK	Reviewing J. Mastin proposed additional revisions to Decl ISO MSJ Opp; emailing w/ GW re same.	0.2	
9/25/2024	BBK	Emailing T. Close re Kailes opinions re emergency evacuation claims related to BD Hemet.	0.1	
9/25/2024	BBK	Conferring w/ RBGG team re prepping MSJ Opp and immediate tasks for same.	0.2	
9/25/2024	BBK	Preparing immediate task list for MSJ Opp filing.	0.3	
9/25/2024	BBK	Phone call w/ GW re expert declarations & MSJ Opp.	0.2	
9/25/2024	BBK	Meeting w/ JSY/AHS/BM re preparing MSJ Opp.	0.5	
9/25/2024	BBK	Reviewing Court Order denying stipulated EOT for Daubert Motions; conferring w/ team re same.	0.1	
9/25/2024	BBK	Emailing w/ J. Mastin re revisions to Decl ISO MSJ Opp.	0.2	
9/25/2024	BBK	Conferring w/ JSY and BM re admin sealing motion.	0.1	
9/25/2024	BBK	Check-in meeting w/ co-counsel re MSJ Opp.	0.2	
9/25/2024	BBK	Phone call w/ JSY re dispositive motions hearing.	0.2	
9/25/2024	BBK	Conferring w/ RBGG team re preparing exhibits for BBK Decl.	0.4	
9/25/2024	BBK	Revising Mastin and Waters Decls ISO MSJ Opp.	1.5	
9/25/2024	BBK	Emailing w/ M. Johnson re Anderson deposition and obtaining expedited transcript of same.	0.1	
9/25/2024	BBK	Reviewing/incorporating GW revisions to MSJ Opp.	1.6	
9/25/2024	BBK	Phone call w/ JSY re next steps for completing MSJ Opp and supporting pleadings.	0.2	
9/25/2024	BBK	Preparing cite check assignment for BM and AHS; emailing them re same.	0.2	
9/25/2024	BBK	Emailing w/ G. Waters & J Mastin re finalizing/executing Decls ISO MSJ Opp.	0.2	
9/25/2024	BBK	Conferring w/ WP re finalizing G. Waters and J. Mastin decls and exhibits; reviewing/correcting same.	0.2	
9/25/2024	BBK	Conferring w/ AHS and KES re BBK Decl and exhibits to same.	0.5	
9/25/2024	BBK	Conferring w/ JSY re her proposed edits and cuts to brief.	0.1	
9/25/2024	BBK	Revising MSJ Opp to incorporate all record and declaration citations.	4.0	
9/25/2024	BBK	Researching/drafting MSJ Opp section re Quinlan emergency evacuation claims.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/25/2024	BBK	Revising MSJ Opp to incorporate JSY edits and make further cuts to same.	1.2	
9/25/2024	AHS	Met with BM JY BBK to discuss next steps for MSJ Opp and BBK Decl.	0.7	
9/25/2024	AHS	Met with cocounsel and BBK JY BM DLE KS to discuss status of MSJ Opp and other tasks.	0.2	
9/25/2024	AHS	Emailed with team re BBK declaration.	0.3	
9/25/2024	AHS	Revised BBK Decl. and record citations in draft MSJ Opp.	0.4	
9/25/2024	AHS	Reviewed potential medical record exhibits.	0.4	
9/25/2024	AHS	Conducted a legal cite-check of draft MSJ Opp Sections I.B, I.C., III.A, III.B. IV \\.	5.7	
9/25/2024	BM	Meeting with JSY, BBK, and AHS regarding pending action items for Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	0.5	
9/25/2024	BM	Meeting with co-counsel to discuss pending action items for Plaintiffs' Opposition to Defendants' Motion for Summary Judgment and other case tasks.	0.3	
9/25/2024	BM	Review L. Vallette deposition testimony, supplemental interrogatory responses and other evidence regarding Brookdale Hemet's emergency evacuation plans in connection with Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	0.9	
9/25/2024	BM	Conduct legal cite check of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	4.3	
9/25/2024	BM	Conduct legal research regarding opting out of arbitration after opt-out window ends.	1.5	
9/25/2024	KES	Download and organize Baird depo transcript.	0.2	
9/25/2024	KES	Review, revise and update exhibits in opposition to MSJ; confer team re same; review and update BBK decl re same; draft index re same.	7.0	
9/25/2024	DLE	Download and circulate filed pleading; send to BM.	0.2	
9/25/2024	DLE	Attend and note-take check-in meeting with co-counsel to discuss opposition to summary judgment tasks.	0.2	
9/25/2024	DLE	Finalize and circulate notes from check-in meeting with co-counsel.	0.1	
9/25/2024	DLE	Compile and add slip sheets to exhibits to BBK declaration of plaintiffs' opposition to defs motion for summary judgment.	1.5	
9/25/2024	KC	(Billing Judgment) Obtain article from San Francisco Daily Journal and route to team.	0.0	0.4

SERVICES

Date	Person	Description of Services	Hours	Discount
9/26/2024	GCG	Revise and send letters to 6 named Plaintiffs re settlement process and offer.	0.9	
9/26/2024	GCG	Conf with JSY and emails GW-MJ-KS re same.	0.3	
9/26/2024	GCG	Emails Judge Spero and ER re settlement Zooms.	0.2	
9/26/2024	GCG	Confs with JSY and BBK and emails TC-team re Hemet evacuation issues.	0.3	
9/26/2024	GCG	Emails BBK-team re finalizing opposition to Defendants' MSJ.	0.2	
9/26/2024	JSY	Conf. w/ GCG re status of Opp. and issue with emergency evac claims.	0.2	
9/26/2024	JSY	Two conf. w/ BBK re status of Opp.	0.5	
9/26/2024	JSY	Conf. w/ KES re sealing for Opp.	0.1	
9/26/2024	JSY	Conf. w/ GCG re emergency evac. claim for LV.	0.3	
9/26/2024	JSY	Draft memo re emergency evac. claims and access barrier claims; emails re same.	0.7	
9/26/2024	JSY	Prepare documents for filing Opp and related pleadings; multiple emails and conf. re same.	2.0	
9/26/2024	JSY	Further calls with BBK and GCG re settlement issues and MSJ Opp.	0.4	
9/26/2024	JSY	Conf. w/ BBK re MSJ Opp.; multiple emails re same.	0.4	
9/26/2024	JSY	Review Defs' Daubert motion; messages re same.	0.2	
9/26/2024	BBK	Conferring w/ JSY re MSJ Opp section on Quinlan emergency evac claims.	0.1	
9/26/2024	BBK	Conferring w/ JSY re Vallette's claims.	0.2	
9/26/2024	BBK	Reviewing JSY-TC emails re supp Kailes expert report.	0.1	
9/26/2024	BBK	Reviewing/commenting on JSY memo.	0.2	
9/26/2024	BBK	Phone calls w/ JSY re prepping for and plan for filing MSJ Opp.	0.4	
9/26/2024	BBK	Phone call w/ GW re reviewing MSJ Opp brief.	0.1	
9/26/2024	BBK	Meeting w/ KES re finalizing BBK Decl Exhibits and preparing Appendix A for sealing motion.	0.2	
9/26/2024	BBK	Emails/meetings w/ RBGG team re preparing/fixing/finding BBK Decl exhibits.	1.2	
9/26/2024	BBK	Conferring w/ RBGG team and M. Johnson re expedited transcript of Anderson deposition.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/26/2024	BBK	Revising MSJ Opp to incorporate legal cite check and proposed revisions by BM and AHS.	1.7	
9/26/2024	BBK	Conferring w/ JSY and KES re preparing sealing motion and supporting papers.	0.2	
9/26/2024	BBK	Revising BBK Decl ISO MSJ Opp and checking exhibits to same.	1.6	
9/26/2024	BBK	Conferring w/ JSY and CEG re preparing TOC/TOA for brief.	0.2	
9/26/2024	BBK	Conferring w/ JSY re plan for Reply ISO MPSJ.	0.1	
9/26/2024	BBK	Conferring w/ JSY, AHS, and BM re record/fact cite check.	0.3	
9/26/2024	BBK	Conferring w/ JSY and GW re GW review of brief.	0.3	
9/26/2024	BBK	Conducting record/fact cite check of Sections IV, V and V of Argument Section.	0.8	
9/26/2024	BBK	Revising brief to incorporate BM and AHS and BBK record cite check and cut space.	1.6	
9/26/2024	BBK	Conferring w/ CEG re finalizing brief.	0.2	
9/26/2024	BBK	Conferring w/ KES re finalizing BBK Decl and exhibits (under seal and public versions).	0.2	
9/26/2024	BBK	Reviewing/approving index of Exhibits for BBK decl and declaration itself.	0.2	
9/26/2024	BBK	Final review of docs before filing.	0.5	
9/26/2024	BBK	Filing of Admin Sealing Motion and MSJ Opp.	0.4	
9/26/2024	AHS	Communicated with BBK BM JY KS re fact citecheck plan for MSJ.	0.5	
9/26/2024	AHS	Conducted fact citecheck of Statement of Facts Sections B, C, D and Argument Sections I, III.	5.0	
9/26/2024	AHS	Updated case tasks list.	0.4	
9/26/2024	AHS	Proofread and helped finalize components of MSJ Opp and supervised filing.	2.8	
9/26/2024	BM	Conduct factual record cite check of Plaintiffs' Opposition to Defendants' Motion for Summary Judgment.	5.1	
9/26/2024	BM	Conduct legal research regarding opting out of arbitration after opt-out window ends.	0.5	
9/26/2024	BM	Draft email to team on legal research regarding opting out of arbitration after opt-out window ends.	0.4	
9/26/2024	KES	Download and organize Anderson transcript.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1024

SERVICES

Date	Person	Description of Services	Hours	Discount
9/26/2024	KES	Download and organize Defs Motion to Exclude Pltfs expert opinions.	0.4	
9/26/2024	KES	Review, revise and finalize redacted and unredacted versions of BBK exhibits in opposition to Defs MSJ; update and finalize index and Appendix A for sealing motion re same; finalize other supporting docs re same.	6.5	
9/26/2024	KES	Efile opposition to Defs MSJ and related admin motion to seal; serve under seal docs re same.	0.9	
9/26/2024	DLE	Create and modify caption pages for exhibits for upcoming opposition filing.	0.8	
9/26/2024	DLE	Reduce file size of exhibits for upcoming opposition filing.	0.3	
9/26/2024	DLE	Make changes to citations in exhibits per direction from AHS and BM cite checks.	2.3	
9/27/2024	GCG	Review and analyze Defendants' opposition to MSJ.	0.5	
9/27/2024	GCG	Meet with co-counseling team re reply brief and Daubert oppositions.	0.8	
9/27/2024	GCG	Conf with and emails GW re Defendants' settlement proposal.	0.4	
9/27/2024	GCG	Email Judge Spero re Plaintiffs' need to be on Zoom meeting.	0.2	
9/27/2024	GCG	Set up meeting of principals with ER.	0.2	
9/27/2024	GCG	Conf with JSY re summary judgment and settlement strategy.	0.2	
9/27/2024	JSY	Internal meeting re prep for Reply re MPSJ.	0.8	
9/27/2024	JSY	Conf. w/ BBK re MPSJ Reply.	0.1	
9/27/2024	JSY	Team meeting.	0.8	
9/27/2024	JSY	Emails re agenda for team meeting and case issues.	0.2	
9/27/2024	JSY	Emails re Barchuk transcript signature.	0.1	
9/27/2024	JSY	Review Defs' Opp to MPSJ.	0.1	
9/27/2024	JSY	Review Defs' Opp to MPSJ.	0.7	
9/27/2024	JSY	Conf. w/ GCG re settlement.	0.1	
9/27/2024	JSY	Conf w/ GCG re settlement issues.	0.2	
9/27/2024	BBK	Reviewing email from J. Bertino re: public filing of Allen Expert Report w/ Pls' Daubert motions; emails w/ B. Umpierre re same and reviewing filings to correct same.	0.2	
9/27/2024	BBK	Reviewing Pls' Daubert Motion challenging Allen's opinions on ADA issues.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/27/2024	BBK	Reviewing D' omnibus Daubert Motion challenging certain opinions of Mastin, Waters, Cross, Kailes and Barchuk.	0.4	
9/27/2024	BBK	Analyzing Ds' Opp to Pls' Motion for Partial Summary Judgment.	1.2	
9/27/2024	BBK	Emailing w/ G. Wallace re Ds' arguments re waiver of RABR and alterations claims in Opp to Pls' MPSJ.	0.1	
9/27/2024	BBK	Conferring w/ JSY re division of labor for Reply ISO Pls' MPSJ.	0.1	
9/27/2024	BBK	Preparing BBK notes for initial plan for Reply ISO Pls' MPSJ.	0.2	
9/27/2024	BBK	Meeting w/ JSY, AHS and BM re plan for Reply ISO Pls' MPSJ.	0.7	
9/27/2024	BBK	Meeting w/ co-counsel re Reply ISO MPSJ and Opps to Daubert Motion; other immediate case tasks.	0.8	
9/27/2024	BBK	Emailing w/ co-counsel and RBGG team re preparing witness list in order to make trial length estimate.	0.1	
9/27/2024	AHS	Reviewed Defs' Opp to MPSJ.	0.5	
9/27/2024	AHS	Met with JY BBK BM to discuss plan for our reply ISO MPSJ.	0.7	
9/27/2024	AHS	Met with co-counsel and JY BBK KS BM GCG to discuss defs opp to our MPSJ and other upcoming case tasks and work.	0.8	
9/27/2024	AHS	Summarized and circulated notes to team.	0.3	
9/27/2024	BM	Review Defendants' Opposition to Plaintiffs' Motion for Partial Summary Judgment.	0.8	
9/27/2024	BM	Attend meeting with JSY, BBK, and AHS to discuss planning for Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	0.8	
9/27/2024	BM	Attend weekly meeting with co-counsel to discuss case status and pending action items.	0.8	
9/27/2024	BM	Clean up notes from meeting with JSY, BBK, and AHS to discuss planning for Plaintiffs' Reply in support of Motion for Summary Judgment, and circulate to team.	0.3	
9/27/2024	KES	Download, organize and circulate Defs documents filed under seal in opposition to Pltfs MPSJ.	0.4	
9/27/2024	KES	Download and organize all public and sealed pleadings re Plfs and Defs oppositions to MSJs.	1.0	
9/27/2024	KES	Zoom meeting with co-counsel re summary judgment opp and upcoming deadlines.	0.8	
9/27/2024	KES	Emails with B. Umpierre re admin mot to seal and review draft re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
9/27/2024	KES	Email to court reporter with Barchuk depo signature.	0.2	
9/28/2024	GCG	Email GW-JSY re trial estimate and witness list.	0.1	
9/28/2024	JSY	Emails re witness list.	0.1	
9/30/2024	GCG	Conf with BBK re oral argument preparation and upcoming settlement conference.	0.2	
9/30/2024	GCG	Conf with AS re contacting named Plaintiffs for meeting of the principals.	0.1	
9/30/2024	GCG	Conf with JSY and BM and emails MJ-GW re same.	0.3	
9/30/2024	GCG	Draft and send letter to HF re settlement meeting.	0.2	
9/30/2024	GCG	Confs with HF re meeting.	0.2	
9/30/2024	GCG	Emails GW and JSY re trial time estimate.	0.2	
9/30/2024	JSY	Conf and messages re settlement conference.	0.2	
9/30/2024	JSY	Emails re Barchuk Daubert.	0.2	
9/30/2024	JSY	Messages re trial estimate.	0.2	
9/30/2024	BBK	Conferring w/ GCG re G. Wallace draft trial length estimate and reviewing same.	0.1	
9/30/2024	BBK	Conferring w/ GCG & JSY re notifying clients re attending 10/2 settlement meeting w/ BD.	0.1	
9/30/2024	BBK	Meeting w/ GCG re arguing dispositive motions hearing and outreach to clients re settlement meeting.	0.3	
9/30/2024	BBK	Reviewing materials in prep for outreach to clients re settlement meeting; emailing AHS re same.	0.3	
9/30/2024	BBK	Meeting w/ AHS re outreach to clients re settlement meeting.	0.2	
9/30/2024	BBK	Phone calls and FU emails w/ P. Lindstrom and J. Carlson re 10/2 settlement meeting w/ Ds.	0.6	
9/30/2024	BBK	Emails w/ GCG and B. Umpierre re outreach to H. Fisher re settlement offer and counter-offer.	0.1	
9/30/2024	BBK	Outlining Reply ISO MPSJ and conducting legal research for same.	4.0	
9/30/2024	AHS	Reviewed materials to named plfs re: settlement offer.	0.3	
9/30/2024	AHS	Met with BBK to discuss outreach to plfs re settlement offer and conference.	0.3	
9/30/2024	AHS	Met with GCG to discuss outreach to plfs re settlement offer and conference.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1027

SERVICES

Date	Person	Description of Services	Hours	Discount
9/30/2024	AHS	Reached out to named plfs BJH and LV re: settlement offer and conference.	0.4	
9/30/2024	AHS	Had phone call with Loresia Vallette re settlement conference and sent her follow-up e-mail.	0.5	
9/30/2024	AHS	Had call with Bernie Jestrabek-Hart re: settlement proposal and conference and sent follow up email.	0.4	
9/30/2024	BM	Outline sections on mootness and the former Fleet Safety Policy in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	1.5	
9/30/2024	BM	Review A. Barchuk Rule 26 expert report and deposition testimony in connection with Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	1.2	
9/30/2024	BM	Review prior briefing to exclude expert testimony in connection with Plaintiffs' Motion for Class Certification to identify legal research for Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	1.3	
9/30/2024	BM	Conduct legal research in connection with Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony related to A. Barchuk.	1.4	
9/30/2024	KES	Download and circulate filed pleadings.	0.2	
9/30/2024	KES	Review and update electronic MSJ opp files.	0.2	
9/30/2024	KES	Download and organize Anderson Vol 2 transcript.	0.2	
9/30/2024	KES	Review draft witness list.	0.1	
9/30/2024	DLE	Save and circulate filed pleadings.	0.3	
10/1/2024	GCG	Email team re Brookdale acquisition of additional communities.	0.1	
10/1/2024	GCG	Prepare for and conduct pre-settlement conference meeting with GW, MJ and JSY.	0.8	
10/1/2024	GCG	Follow up email and texts to clients re preparation for settlement meeting.	0.7	
10/1/2024	GCG	Confs with JSY re same.	0.3	
10/1/2024	GCG	Conf with KES re trial preparation.	0.1	
10/1/2024	GCG	Email team re same and re reply briefs.	0.1	
10/1/2024	JSY	Conf. w/ GCG re trial estimate.	0.1	
10/1/2024	JSY	Meeting with BM re Daubert re Barchuk; emails re same.	0.4	
10/1/2024	JSY	Messages re settlement meeting.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/1/2024	JSY	Review Daubert motion.	0.2	
10/1/2024	JSY	Meeting with GW, GCG, MTJ re settlement issues; emails re same.	0.5	
10/1/2024	BBK	Meeting w/ KS re supporting pleadings for Reply ISO MPSJ and re: trial prep.	0.2	
10/1/2024	BBK	Emailing w/ JSY and co-counsel re Daubert Motion opposition.	0.1	
10/1/2024	BBK	Emailing w/ GCG and co-counsel re settlement meeting w/ Ds and clients on 10/2.	0.1	
10/1/2024	BBK	Conducting record research for Reply ISO MPSJ.	1.7	
10/1/2024	BBK	Drafting Reply ISO MPSJ.	3.5	
10/1/2024	AHS	Discussed trial issues with KS.	0.5	
10/1/2024	BM	Meeting with JSY to discuss A. Barchuk portion of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	0.3	
10/1/2024	BM	Draft Fleet Safety Policy mootness portion of Plaintiffs' Reply in support of Partial Motion for Summary Judgment.	6.2	
10/1/2024	KES	Review and update case calendar.	0.2	
10/1/2024	KES	Organize co-counsel documents regarding Daubert opposition.	0.2	
10/1/2024	DLE	Save and circulate relevant article for fact research.	0.1	
10/1/2024	DLE	Save and circulate relevant cases for legal research.	0.1	
10/2/2024	GCG	Prepare for settlement conference.	0.6	
10/2/2024	GCG	Conf with JA's son re same.	0.2	
10/2/2024	GCG	Conduct settlement Zoom - "Meeting of the Principals".	0.7	
10/2/2024	GCG	Draft memo to file re same.	0.5	
10/2/2024	GCG	Draft letters to MJ Spero re same.	0.3	
10/2/2024	GCG	Follow up call with HF re same.	0.3	
10/2/2024	GCG	Conf with GW, MJ and JSY re settlement strategy.	0.4	
10/2/2024	JSY	Settlement meeting.	0.6	
10/2/2024	JSY	Multiple conf. with clients, co counsel, GCG re settlement meeting; emails re same.	1.1	
10/2/2024	BBK	Conferring w/ RBGG team re client participation in settlement meeting w/ Brookdale.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/2/2024	BBK	Reviewing GCG draft email to MJ Spero re settlement conf. and MJohnson proposed revisions to same.	0.2	
10/2/2024	BBK	Reviewing transcript of 9/19 hearing on motion to decertify access barrier subclasses and motion to certify interlocutory appeal rec'd from court reporter today.	0.2	
10/2/2024	BBK	Researching and drafting Reply Brief ISO MPSJ.	5.3	
10/2/2024	AHS	Outlined section of Reply ISO MPSJ on public accommodations.	3.2	
10/2/2024	BM	Draft portion of Plaintiffs' Reply in support of Motion for Partial Summary Judgment concerning Defendants' regulatory argument as to the Fleet Safety Policy.	3.8	
10/2/2024	BM	Conduct legal research on state of mind and intent expert testimony for Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	0.3	
10/2/2024	KES	Review and circulate hearing transcript received from court reporter.	0.2	
10/3/2024	GCG	Research, revise and send letter to Judge Spero re Defendants' tactics at settlement Zoom.	0.9	
10/3/2024	GCG	Confs with JC, LV, BJ-H, HF and PL re same.	1.0	
10/3/2024	GCG	Conf with GW and emails MJ-GW-JSY re settlement strategy.	0.5	
10/3/2024	GCG	Review and analyze Defendants' omnibus Daubert motion.	0.3	
10/3/2024	GCG	Email MJ-KES-DE re Plaintiffs' signed retainer agreements.	0.1	
10/3/2024	GCG	Draft memo to file re conversations GW-BBK re MSJ.	0.2	
10/3/2024	GCG	Emails w/ JSY re LV limited claims and agenda for co-counsel meeting.	0.1	
10/3/2024	GCG	Draft and revise memo to file re settlement process.	0.7	
10/3/2024	JSY	Emails and messages re settlement issues.	0.3	
10/3/2024	BBK	Reviewing emails w/ co-counsel re settlement meeting.	0.2	
10/3/2024	BBK	Reviewing Ds' portion of trial estimate pleading and G. Wallace draft Pls' portion of same.	0.2	
10/3/2024	BBK	Emailing w/ RBGG team re comm'ns w/ clients re 10/2 settlement meeting w/ Ds.	0.1	
10/3/2024	BBK	Emails w/ BM and AHS re drafting inserts for Reply ISO MPSJ.	0.3	
10/3/2024	BBK	Phone call w/ BM re additional research for Reply ISO MPSJ.	0.1	
10/3/2024	BBK	Drafting Reply ISO MPSJ.	5.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/3/2024	AHS	Reviewed emails re settlement conference of the principals.	0.3	
10/3/2024	AHS	Emailed with BBK re facts for public accomm section of Reply ISO MPSJ.	0.2	
10/3/2024	AHS	Drafted public accommodation section of Reply ISO MPSJ.	9.2	
10/3/2024	BM	Finalize draft portions of Plaintiffs' Reply in support of Motion for Partial Summary Judgment concerning Defendants' mootness and regulatory arguments as to the Fleet Safety Policy.	1.5	
10/3/2024	BM	Conduct legal research on state of mind and intent expert testimony for Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	0.5	
10/3/2024	BM	Draft portion of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony relate to A. Barchuk.	1.8	
10/3/2024	BM	Conduct research into issues of ADA compliance and aesthetic considerations and concerns regarding building accessibility in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	1.4	
10/3/2024	BM	Telephone call with BBK regarding issues of ADA compliance and aesthetic considerations and concerns as to building accessibility in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	0.2	
10/3/2024	BM	Draft email to BBK regarding research into issues of ADA compliance and aesthetic considerations and concerns regarding building accessibility in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	0.2	
10/3/2024	KES	Gather settlement documents and email GCG re same.	0.3	
10/3/2024	KES	Review and organize draft witness list.	0.1	
10/3/2024	KES	Update contacts list.	0.3	
10/3/2024	KES	Download and circulate pleading.	0.1	
10/3/2024	DLE	Confer with KES re trial prep software.	0.2	
10/4/2024	GCG	Emails BBK-JSY re direct threat defense and reply brief.	0.1	
10/4/2024	GCG	Confs w/ JSY re team meeting, reply brief and Judge Spero clerk contact.	0.1	
10/4/2024	GCG	Conf with Judge Spero clerk.	0.1	
10/4/2024	GCG	Draft email to ER re same.	0.2	
10/4/2024	GCG	Emails GW-MJ-JSY re authorities re class representative settlement negotiations.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/4/2024	GCG	Emails GW-MJ-JSY re trial focus group.	0.1	
10/4/2024	JSY	Emails re MSJ reply.	0.1	
10/4/2024	JSY	Emails re trial prep.	0.1	
10/4/2024	JSY	Conf. w/ GCG re settlement issues and MSJ reply.	0.2	
10/4/2024	JSY	Conf. w/ BBK re MSJ reply.	0.3	
10/4/2024	JSY	Emails re MSJ Reply.	0.1	
10/4/2024	JSY	Team meeting.	1.0	
10/4/2024	JSY	Edits to memo re settlement issues.	0.2	
10/4/2024	JSY	Edit notes and memo re settlement meeting; emails re same.	0.7	
10/4/2024	JSY	Conf. w/ GCG re settlement issues; emails re same.	0.3	
10/4/2024	JSY	Emails re jury consultant.	0.1	
10/4/2024	JSY	Emails re Daubert opp re Barchuk.	0.1	
10/4/2024	BBK	Emails w/ JSY and GCG re argument IRT Ds' direct threat affirmative defense for Reply ISO MPSJ.	0.1	
10/4/2024	BBK	Analyzing/commenting on AHS draft insert for Reply Brief re Title III coverage of BD's facilities.	0.7	
10/4/2024	BBK	Conferring w/ JSY re AHS draft insert and re status of Reply Brief.	0.2	
10/4/2024	BBK	Emailing w/ AHS re revisions to draft insert for Reply Brief.	0.1	
10/4/2024	BBK	Meeting w/ AHS re revisions to draft insert for Reply Brief.	0.5	
10/4/2024	BBK	Phone call w/ JSY re plan for finalizing draft Reply ISO MPSJ.	0.3	
10/4/2024	BBK	Emailing w/ JSY and KES re whether any exhibits to be filed ISO Reply must be sealed.	0.1	
10/4/2024	BBK	Meeting w/ co-counsel re Reply Brief, Daubert Opposition and settlement negotiations & RBGG debrief re same.	1.0	
10/4/2024	BBK	Emailing w/ RBGG team and co-counsel re settlement meeting w/ clients.	0.1	
10/4/2024	BBK	Emailing w/ co-counsel re draft Reply section on direct threat affirmative defense.	0.2	
10/4/2024	BBK	Drafting Reply ISO MPSJ.	6.2	
10/4/2024	AHS	Emailed w BBK re rearranging section of reply on public accommodatoins.	0.3	
10/4/2024	AHS	Revised section of reply ISO MPSJ on public accommodations.	3.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/4/2024	AHS	Call with BBK re Reply ISO MPSJ.	0.6	
10/4/2024	AHS	Discussed trial prep and current state of case with DLE.	0.3	
10/4/2024	AHS	Attended weekly meeting with cocounsel and JY BBK DLE BM KS.	1.0	
10/4/2024	BM	Weekly meeting with co-counsel to discuss case status and pending action items.	0.9	
10/4/2024	BM	Meeting with JSY, BBK, AHS, KES, and DLE to debrief after weekly co-counsel meeting.	0.2	
10/4/2024	BM	Draft insert regarding A. Barchuk portion of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony.	6.0	
10/4/2024	KES	Participate in Zoom meeting with co-counsel.	1.1	
10/4/2024	DLE	Confer with AHS re case tasks.	0.3	
10/4/2024	DLE	Save and circulate filed pleadings.	0.2	
10/4/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.0	
10/4/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.4	
10/5/2024	GCG	Email with JSY and BBK re trial.	0.1	
10/5/2024	GCG	Revise memo to file re meeting with SS.	0.1	
10/5/2024	GCG	Email with GW re injunctive relief component of settlement.	0.1	
10/5/2024	AHS	Revised section of reply ISO MPSJ on public accommodations.	3.5	
10/6/2024	GCG	Emails GW-JSY re ER responses re settlement posture and plan.	0.2	
10/6/2024	GCG	Email GW-team re settlement conference statement.	0.1	
10/6/2024	JSY	Review and edit sections of Daubert opp re Barchuk.	0.5	
10/6/2024	BBK	Reviewing GCG-E Rutner emails re Ds' demand to negotiate individual damages claims of Pls' B4 claims of certified and putative classes.	0.1	
10/6/2024	BBK	Emailing w/ GCG and G. Wallace re preparing settlement conference statement.	0.1	
10/6/2024	BBK	Drafting Reply ISO MPSJ.	7.5	
10/6/2024	BBK	Analyzing Ds' Rog Resps re legality of FSP and emailing w/ co-counsel re same.	0.2	
10/7/2024	GCG	Review and comment on draft settlement statement.	0.1	
10/7/2024	GCG	Email ER-GW-MJ-JSY re settlement conference.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/7/2024	GCG	Conf with JSY re reply brief.	0.1	
10/7/2024	JSY	Emails re mock trial.	0.1	
10/7/2024	JSY	Conf. w/ BBK re Reply.	0.2	
10/7/2024	JSY	Conf. w/ GCG re Reply and settlement conference.	0.1	
10/7/2024	JSY	Review and edit reply; emails re same.	1.6	
10/7/2024	JSY	Emails re sealing motion.	0.1	
10/7/2024	JSY	Emails re reply.	0.1	
10/7/2024	BBK	Emailing re Reply ISO Pls' MPSJ filing.	0.1	
10/7/2024	BBK	Reviewing/responding to BM re research on Ds' aesthetics v. accessibility argument.	0.2	
10/7/2024	BBK	Drafting filing checklist for Reply.	0.2	
10/7/2024	BBK	Preparing Exhibits (including IDing all depo excerpts) for BBK Decl ISO Reply Brief; emailing w/ AHS and KES re same.	1.2	
10/7/2024	BBK	Drafting BBK Reply Decl.	0.5	
10/7/2024	BBK	Conferring w/ KES and JSY re whether to file Johnson Depo Excerpts conditionally under seal.	0.2	
10/7/2024	BBK	Reviewing emails w/ BM and co-counsel re Barchuk insert for Daubert Opposition.	0.1	
10/7/2024	BBK	Meeting w/ AHS re Reply Brief and legal research for same.	0.4	
10/7/2024	BBK	Emailing w/ JSY re Reply brief revisions.	0.1	
10/7/2024	BBK	Drafting/sending email to RBGG team re status of Reply Brief and supporting papers.	0.2	
10/7/2024	BBK	Reviewing JSY comments on Reply Brief; revising same.	2.2	
10/7/2024	BBK	Phone call w/ JSY re Reply Brief.	0.2	
10/7/2024	BBK	Emailing w/ co-counsel re Reply Brief.	0.2	
10/7/2024	BBK	Reviewing R. Steyer comments on Reply Brief and revising accordingly; conferring w/ JSY re same.	0.3	
10/7/2024	AHS	Read draft reply ISO MPSJ and related emails.	1.0	
10/7/2024	AHS	Met with BBK to discuss legal citation for Reply ISO MPSJ.	0.4	
10/7/2024	AHS	Researched case for footnote in Reply ISO MPSJ.	0.7	
10/7/2024	BM	Finalize draft insert regarding A. Barchuk portion of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony and send to co-counsel.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/7/2024	BM	Revise draft insert regarding A. Barchuk portion of Plaintiffs' Opposition to Defendants' Motion to Exclude Expert Testimony based on JSY edits and comments.	0.8	
10/7/2024	BM	Draft email to BBK regarding research into issues of ADA compliance and aesthetic considerations and concerns regarding building accessibility in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	0.8	
10/7/2024	KES	Prepare exhibits for BBK reply decl ISO MPSJ and confer BBK and AS re same.	1.4	
10/7/2024	KES	Email GCG re list of client representatives as named in complaint.	0.1	
10/7/2024	KES	Check status of attorney appearances.	0.1	
10/8/2024	GCG	Emails GW-team re settlement statement.	0.2	
10/8/2024	GCG	Emails ER-Spero clerk re pre-registration for settlement conference.	0.2	
10/8/2024	GCG	Review and analyze reply brief.	0.5	
10/8/2024	GCG	Conf w/ BBK and JSY re issue raised regarding new facility claim.	0.2	
10/8/2024	GCG	Email JSY-team re potential plaintiff.	0.1	
10/8/2024	JSY	Conf. w/ BM re Daubert opp; emails re same.	0.2	
10/8/2024	JSY	Conf w/ BM re Daubert opp.	0.1	
10/8/2024	JSY	Conf w/ GCG and BBK re access barrier claims.	0.3	
10/8/2024	JSY	Emails re settlement conference.	0.1	
10/8/2024	JSY	Emails re reply brief and other docs.	0.2	
10/8/2024	JSY	Conf. w/ GCG re settlement conference email; emails re same.	0.2	
10/8/2024	BBK	Reviewing emails w/ co-counsel re draft settlement conference statement; conferring w/ JSY re same.	0.2	
10/8/2024	BBK	Prepare pleadings for Reply ISO Pls' MPSJ.	0.1	
10/8/2024	BBK	Reviewing emails w/ co-counsel and BM re Daubert Opposition draft.	0.1	
10/8/2024	BBK	Reviewing/responding to AHS report re legal research for Reply ISO MPSJ.	0.3	
10/8/2024	BBK	Reviewing G. Wallace thoughts re alterations claims at San Ramon and Scotts; planning/preparing position re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/8/2024	BBK	Phone call w/ GCG and JSY re strategy for alterations claims at San Ramon and Scotts Valley.	0.3	
10/8/2024	BBK	Drafting/sending email to G. Wallace re strategy for alterations claims at San Ramon and Scotts Valley and re: REply ISO MPSJ.	0.1	
10/8/2024	BBK	Revising Reply ISO MPSJ per GCG comments.	0.2	
10/8/2024	BBK	Reviewing emails w/ OC re settlement conference.	0.1	
10/8/2024	BBK	Conferring w/ BM and KES re admin motion to consider whether to seal Ds' designated materials.	0.2	
10/8/2024	BBK	Reviewing/commenting on BM's draft admin motion to consider whether to seal Ds' designated materials.	0.2	
10/8/2024	BBK	Emailing w/ AHS and BM re legal and record cite check for Reply Brief.	0.1	
10/8/2024	BBK	Emailing w/ G. Wallace re review of Reply Brief.	0.1	
10/8/2024	AHS	Researched case for footnote in Reply ISO MPSJ.	2.8	
10/8/2024	BM	Review draft Opposition to Defendants' Motion to Exclude Expert Testimony sent by co-counsel MTJ.	0.3	
10/8/2024	BM	Telephone call with JSY to discuss draft Opposition to Defendants' Motion to Exclude Expert Testimony sent by co-counsel MTJ.	0.1	
10/8/2024	BM	Revise draft Opposition to Defendants' Motion to Exclude Expert Testimony and send to co-counsel.	0.5	
10/8/2024	BM	Draft administrative motion and proposed order to consider whether to file under seal Defendants' designated materials in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment.	1.1	
10/8/2024	BM	Revise administrative motion and proposed order to consider whether to file under seal Defendants' designated materials in connection with Plaintiffs' Reply in support of Motion for Partial Summary Judgment based on BBK feedback.	0.3	
10/8/2024	FGL	(Billing Judgment) Review KES email re additional opposing counsel and run supplemental conflicts check re same.	0.0	0.2
10/8/2024	KES	Email BM re sealing motion for MPSJ reply.	0.1	
10/9/2024	JSY	Emails re Reply.	0.2	
10/9/2024	JSY	Emails with clients re settlement conf.	0.4	
10/9/2024	JSY	Emails re settlement conference attendance.	0.1	
10/9/2024	JSY	Emails re tasks for reply.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/9/2024	BBK	Preparing/sending assignment to AHS and BM re legal and record cite check for Reply ISO MPSJ.	0.3	
10/9/2024	BBK	Reviewing emails w/ co-counsel and clients re attending 10/15 settlement conference.	0.1	
10/9/2024	BBK	Conferring w/ KES re exhibits for BBK Reply Decl.	0.1	
10/9/2024	BBK	Conferring w/ JSY re revisions to Reply Brief.	0.1	
10/9/2024	BBK	Conferring w/ AHS and BM re cite check for Reply brief.	0.1	
10/9/2024	BBK	Analyzing Ds' Opp to MPSJ and GW comments on Reply Brief; revising Reply Brief accordingly.	2.8	
10/9/2024	BBK	Drafting/sending update to GCG and JSY re Reply Brief and supporting pleadings.	0.1	
10/9/2024	BBK	Revising Admin Motion re Sealing and Proposed Order and BBK Reply Dec.	0.6	
10/9/2024	BBK	Drafting assignment for DLE re preparing under seal and public versions of BBK Reply Decl and Exhibits; phone call w/ DLE re same.	0.3	
10/9/2024	BBK	Reviewing/revising Johnson Depo Excerpt Exhibit to BBK Reply Decl; conferring w/ DLE re same.	0.5	
10/9/2024	BBK	Reviewing/approving under seal and public versions of BBK Reply Decl.	0.2	
10/9/2024	BBK	Updating filing checklist for Reply ISO MPSJ and sending email update to RBGG team.	0.1	
10/9/2024	BBK	Reviewing Ds' Daubert Motion to exclude Kennedy testimony.	0.1	
10/9/2024	BBK	Revising Reply Brief to incorporate AHS and BM legal and record cite check and further revisions to same.	2.2	
10/9/2024	AHS	Emailed with team re legal and fact citecheck for Reply ISO MPSJ.	0.1	
10/9/2024	AHS	Conducted legal and fact cite-check of Fleet Safety Portion of Reply ISO MPSJ.	3.9	
10/9/2024	BM	Conduct legal and record cite check of portions of Plaintiffs' Reply in Support of Motion for Partial Summary Judgment.	5.3	
10/9/2024	DLE	Attend demonstration for trial presentation software with KES.	0.5	
10/9/2024	DLE	Confer with BBK re finalizing exhibits for summary judgment reply.	0.1	
10/9/2024	DLE	Compile and finalize exhibits for summary judgment reply.	0.7	
10/10/2024	GCG	Conf with GW re settlement conference.	0.1	
10/10/2024	GCG	Review and revise memo to file re settlement process.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/10/2024	GCG	Research re Judge Spero approach.	0.2	
10/10/2024	GCG	Conf with BBK and emails team re reply brief ISO MSJ.	0.2	
10/10/2024	JSY	Emails re reply.	0.1	
10/10/2024	JSY	Emails re memo re plaintiffs' claims.	0.2	
10/10/2024	JSY	Emails and messages re Chapman and scope of relief.	0.2	
10/10/2024	JSY	Emails re Daubert opp.	0.2	
10/10/2024	JSY	Emails re settlement.	0.1	
10/10/2024	JSY	Conf. w/ GCG re settlement issues.	0.1	
10/10/2024	JSY	Emails re mock trial and team meeting.	0.2	
10/10/2024	JSY	Review Defs' Reply brief.	0.2	
10/10/2024	BBK	Reviewing/revising Reply ISO MPSJ.	0.7	
10/10/2024	BBK	Finalizing Reply brief.	0.1	
10/10/2024	BBK	Emailing RBGG team re status of Reply Brief and supporting papers.	0.1	
10/10/2024	BBK	Reviewing/responding to G. Wallace email re strategy for seeking injunctive relief to remediate barriers in resident rooms other than named Pls'; conferring w/ JSY and GCG re same.	0.3	
10/10/2024	BBK	Reviewing G. Wallace email analyzing number of resident rooms that must be brought into compliance under ADAAG and M. Johnson response to same.	0.1	
10/10/2024	BBK	Emailing w/ RBGG team re preparing analysis of Pls' remaining individual and class/putative class claims for settlement conference.	0.1	
10/10/2024	BBK	Emailing w/ JSY, BM, and co-counsel re finalizing Daubert Opposition.	0.2	
10/10/2024	BBK	Conferring w/ JSY and GCG re finalizing and filing Reply ISO MPSJ.	0.2	
10/10/2024	BBK	Reviewing/correcting TOA/TOC for Reply Brief; conferring w/ CEG re same.	0.4	
10/10/2024	BBK	Conferring w/ GM re intake call from family member of BD Danville resident.	0.1	
10/10/2024	BBK	Conferring w/ JSY/GCG/KES/DLE re serving under seal docs on Ds and filing Admin Motion re Sealing and proposed order emailed to Judge's chambers; reviewing/revising DLE drafts of same.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/10/2024	BBK	Emailing w/ team re meeting to prep for settlement conference.	0.1	
10/10/2024	BBK	Final review and proof-read of Reply Brief before filing.	0.8	
10/10/2024	BBK	Final review of supporting pleadings for Reply Brief prior to filing.	0.2	
10/10/2024	BBK	Attending to filing Reply Brief w/ DLE.	0.2	
10/10/2024	BBK	Reviewing Ds' Opp to Pls' Daubert Motion re Allen Opinions on ADA coverage.	0.1	
10/10/2024	AHS	Discussed MPSJ with BBK.	0.3	
10/10/2024	AHS	Discussed filing with DLE.	0.3	
10/10/2024	AHS	Emailed with team re: assignment to categorize claims by named plaintiff.	0.2	
10/10/2024	AHS	Reviewed emails from team re standing.	0.2	
10/10/2024	AHS	Reviewed team e-mails re filing Reply ISO MPSJ and weekly meeting.	0.2	
10/10/2024	AHS	Read Defendants Reply ISO their MSJ.	0.5	
10/10/2024	BM	Review draft Opposition to Defendants' Motion to Exclude Expert Testimony sent by co-counsel.	0.5	
10/10/2024	BM	Send email to team with thoughts on draft Opposition to Defendants' Motion to Exclude Expert Testimony sent by co-counsel.	0.3	
10/10/2024	KES	Efile admin motion to seal re opposition to MSJ.	0.4	
10/10/2024	DLE	Discussed filing with AHS.	0.3	
10/10/2024	DLE	Prepare and finalize exhibits to BBK declaration ISO Reply re motion for partial summary judgment.	1.6	
10/10/2024	DLE	Confer with BBK re exhibits for Plaintiffs' Reply re Motion for Partial Summary Judgment.	0.2	
10/10/2024	DLE	Create and sign proof of service re under seal docs for Plaintiffs' Reply re Motion for Partial Summary Judgment.	0.3	
10/10/2024	DLE	File Plaintiffs' Reply re Motion for Partial Summary Judgment; serve under seal docs re same.	0.4	
10/10/2024	DLE	Save and circulate filed pleadings.	0.3	
10/11/2024	GCG	Conf with JSY and emails GW-team re preparation for settlement conference and potential objections to reply evidence.	0.2	
10/11/2024	JSY	Conf w/ GCG re Defs' Reply.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/11/2024	JSY	Emails re mock trial.	0.1	
10/11/2024	JSY	Meeting with AHS re memo re named plaintiffs' claims.	0.7	
10/11/2024	JSY	Review Defs' reply; multiple emails and messages re same.	1.3	
10/11/2024	JSY	Conf. w/ BBK re Defs' Reply and intakes from class members.	0.3	
10/11/2024	JSY	Edit memo re settlement communications.	0.2	
10/11/2024	JSY	Emails re transition of access barrier info.	0.2	
10/11/2024	BBK	Conferring w/ RBGG team re identifying potential objections to reply evidence.	0.2	
10/11/2024	BBK	Conferring w/ DLE re Ds' under seal filings ISO Reply ISO MSJ.	0.2	
10/11/2024	BBK	Reviewing Ds' Reply ISO MSJ.	0.5	
10/11/2024	BBK	Analyzing Ds' Reply ISO MSJ and conferring w/ JSY re responding to new arguments in same.	1.3	
10/11/2024	BBK	Reviewing BM and AHS emails re legal research on arbitration opt-outs.	0.1	
10/11/2024	BBK	Emailing w/ GCG and JSY re preparing for dispositive motions hearing and moot for same.	0.2	
10/11/2024	BBK	Emailing w/ JSY and GW re Ds' Reply ISO MSJ.	0.2	
10/11/2024	BBK	Reviewing BM's analysis re Ds' Reply Evidence; analyzing whether there is grounds to object to Anderson deposition testimony and emailing team re same.	0.6	
10/11/2024	BBK	Phone call w/ JSY re intakes from family of Brookdale residents and dispositive motion oral argument.	0.3	
10/11/2024	BBK	Conferring w/ AHS re outreach to intakes from family of Brookdale residents.	0.2	
10/11/2024	AHS	Prepared for meeting with JY re claims memo.	0.2	
10/11/2024	AHS	Call with JY re: claims memo.	0.7	
10/11/2024	AHS	Reviewed team emails re: evidence and arguments in Defs' reply brief.	0.3	
10/11/2024	AHS	Emailed with BM and team re arbitration agreements.	0.2	
10/11/2024	AHS	Responded to intakes.	0.4	
10/11/2024	BM	Draft email to team on legal research regarding opting out of arbitration after opt-out window ends.	0.4	
10/11/2024	BM	Conduct legal research regarding opting out of arbitration after opt-out window ends.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/11/2024	BM	Review Defendants' Reply in support of Motion for Summary Judgment.	0.5	
10/11/2024	BM	Review evidence attached to Defendants' Reply in Support of Motion for Summary Judgment for any potential evidentiary or other objections.	1.4	
10/11/2024	DLE	Download and circulate filed pleadings.	0.3	
10/11/2024	DLE	Troubleshoot issues downloading under seal documents from defendants; download and circulate same.	0.6	
10/13/2024	GCG	Review and analyze BM research re arbitration clause opt outs.	0.2	
10/13/2024	GCG	Begin reviewing defendants' reply ISO motion from summary judgment.	0.1	
10/14/2024	GCG	Review and analyze defendants' reply ISO summary judgment.	1.0	
10/14/2024	GCG	Confs with BBK and JSY re same and re trial and settlement preparation.	0.3	
10/14/2024	GCG	Emails BBK-team re preparation for oral argument.	0.2	
10/14/2024	GCG	Conf with GW re settlement strategy.	0.2	
10/14/2024	GCG	Conf with ML and emails named plaintiffs re settlement conference.	0.3	
10/14/2024	GCG	Review and analyze plaintiffs' settlement statement.	0.5	
10/14/2024	GCG	Conf with JSY and emails AS-BBK re memo re plaintiffs' claims.	0.3	
10/14/2024	JSY	Conf. two times w/ GCG re settlement conf., trial prep, pending motions.	0.3	
10/14/2024	JSY	Emails re objections to reply evidence.	0.2	
10/14/2024	JSY	Emails re moot.	0.1	
10/14/2024	JSY	Conf. w/ GCG re settlement conference.	0.2	
10/14/2024	JSY	Emails re memo re plaintiff claims; review chart re same; conf. w/ GCG and AHS re same.	1.0	
10/14/2024	BBK	Emailing w/ BM and AHS re legal research on arbitration opt-outs.	0.1	
10/14/2024	BBK	Reviewing Pls' Opp to Ds' MIL to exclude certain testimony of Pls' experts.	0.4	
10/14/2024	BBK	Attending to setting up moot dispositive motion hearing.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/14/2024	BBK	Conferring w/ JSY, BM, and GCG re objections to Ds' Reply Evidence ISO MSJ (including analyzing testimony submitted on reply).	0.5	
10/14/2024	BBK	Reviewing emails w/ clients re 10/15 settlement conference.	0.1	
10/14/2024	BBK	Phone call w/ GCG re objections to Reply Evidence.	0.2	
10/14/2024	BBK	Reviewing/commenting on AHS draft chart re status of named Pls' and class claims; conferring w/ AHS re revisions for same.	0.7	
10/14/2024	BBK	Conferring w/ JSY re chart re status of named Pls' and class claims.	0.2	
10/14/2024	AHS	Created claims chart to show what claims remain.	4.1	
10/14/2024	BM	Draft Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.7	
10/14/2024	BM	Review Douglas Anderson deposition testimony cited in Defendants' Reply in support of Motion for Summary Judgment for potential evidentiary objection.	0.6	
10/14/2024	BM	Send email to co-counsel regarding plan for Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.4	
10/14/2024	BM	Review Josh Allen deposition testimony cited in Defendants' Reply in support of Motion for Summary Judgment for potential evidentiary objection.	0.8	
10/15/2024	GCG	Prepare for and conduct settlement conference with Judge Spero.	4.0	
10/15/2024	GCG	Follow up call with JA and JSY re same.	0.2	
10/15/2024	GCG	Call with GW re next steps.	0.2	
10/15/2024	GCG	Draft and revise memo to file re settlement process and status.	1.0	
10/15/2024	GCG	Research re Brookdale carriers.	0.2	
10/15/2024	GCG	Conf with JSY re same.	0.1	
10/15/2024	GCG	Emails JSY-BM re objection to reply evidence.	0.1	
10/15/2024	JSY	Review and edit objections document; emails re same.	0.6	
10/15/2024	JSY	Conf. w/ GCG and JA re settlement conference.	0.4	
10/15/2024	JSY	Conf. w/ GCG re settlement conference.	0.2	
10/15/2024	BBK	Reviewing AHS report re PCs to Brookdale resident family members who reached out to RBGG; emailing w/ AHS re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/15/2024	BBK	Emails w/ RBGG team re settlement conference and re: draft Objections to Reply Evidence.	0.1	
10/15/2024	AHS	Intake calls with sister of Brookdale resident, family member of resident and circulated notes re same to team.	2.5	
10/15/2024	AHS	Phone call and emailed with named plaintiff re settlement conference.	0.4	
10/15/2024	BM	Review Defendants' citation to the ADAAG Manual in their Reply in support of Motion for Summary Judgment for potential objection in Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.2	
10/15/2024	BM	Draft Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	4.1	
10/15/2024	BM	Conduct legal research regarding Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.2	
10/15/2024	BM	Revise Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment based on JSY feedback.	1.1	
10/15/2024	BM	Draft email to team with questions on Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.4	
10/15/2024	KES	Review minute entry and calendar deadline.	0.2	
10/15/2024	KES	Email team re video for potential use at trial.	0.1	
10/15/2024	DLE	Research opposing counsel.	0.2	
10/16/2024	GCG	Draft email to Judge Spero re upcoming settlement conferences.	0.1	
10/16/2024	GCG	Conf with JSY and emails GW-MJ re same.	0.2	
10/16/2024	GCG	Review local rule re settlement conference confidentiality.	0.1	
10/16/2024	GCG	Conf with KES re trial exhibits.	0.2	
10/16/2024	GCG	Conf with JSY and email team re trial preparation and oral argument preparation.	0.3	
10/16/2024	GCG	Email GW re Daubert motions.	0.1	
10/16/2024	GCG	Email SC re focus group planning.	0.1	
10/16/2024	JSY	Conf. w/ GCG two times re settlement conf.	0.2	
10/16/2024	JSY	Emails re reply objections; review edits to same.	0.3	
10/16/2024	JSY	Emails re meeting re trial prep.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/16/2024	JSY	Emails re settlement conf. process.	0.2	
10/16/2024	JSY	Review memo re settlement conf. process.	0.2	
10/16/2024	JSY	Further emails re Reply objections.	0.3	
10/16/2024	JSY	Conf. w/ GCG re reply objections and MSJ hearing prep.	0.1	
10/16/2024	JSY	Emails re settlement conference process.	0.1	
10/16/2024	JSY	Conf. w/ GCG re Reply re Daubert.	0.1	
10/16/2024	JSY	Emails re Daubert reply.	0.1	
10/16/2024	BBK	Reviewing/revising draft Objections to Ds' Reply Evidence.	0.7	
10/16/2024	BBK	Conferring w/ BM and JSY re draft Objections to Ds' Reply Evidence.	0.2	
10/16/2024	BBK	Reviewing GCG notes from 10/15 settlement conference.	0.2	
10/16/2024	BBK	Preparing assignment for DLE to create binders for dispositive motions hearing; conferring w/ DLE re same.	0.2	
10/16/2024	BBK	Reviewing G. Wallace proposed edits to draft Objections to Reply Evidence; conferring w/ JSY/BM re same and drafting proposed revisions to same.	0.5	
10/16/2024	BBK	Reviewing M. Johnson comments on draft Objections to Reply Evidence; conferring w/ JSY/BM re same and reviewing/revising BM's proposed edits to address same.	0.5	
10/16/2024	AHS	Reviewed notes from settlement conference memo.	0.3	
10/16/2024	AHS	Reviewed emails re trial prep and objections to evidence.	0.2	
10/16/2024	BM	Send revised draft of Plaintiffs' Objections to Defendants' Reply Evidence in support of their Motion for Summary Judgment to co-counsel for review and input.	0.2	
10/16/2024	BM	Send draft of Plaintiffs' Objections to Defendants' Reply Evidence in support of their Motion for Summary Judgment to co-counsel for review and input.	0.4	
10/16/2024	BM	Revise draft of Plaintiffs' Objections to Defendants' Reply Evidence in support of their Motion for Summary Judgment based on co-counsel edits and comments.	1.1	
10/16/2024	BM	Revise Brookdale case tasks list before internal planning meeting.	0.8	
10/16/2024	KES	Email L. Castro re depo transcripts.	0.1	
10/17/2024	GCG	Prepare for and conduct meeting with trial team to plan for exhibit exchange.	0.9	
10/17/2024	GCG	Emails JSY-team re demonstratives and exhibits for trial.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/17/2024	JSY	Conf. w/ BM re trial prep.	0.1	
10/17/2024	JSY	Team meeting re trial prep.	0.9	
10/17/2024	JSY	Emails re Reply Objections.	0.2	
10/17/2024	JSY	Review Daubert Reply; emails re same.	0.5	
10/17/2024	JSY	Prepare agenda for team meeting; multiple emails re same.	0.4	
10/17/2024	JSY	Emails re memo re inspections.	0.1	
10/17/2024	BBK	Emailing w/ JSY and BM re finalizing/filing Objections to Reply Evidence.	0.1	
10/17/2024	BBK	Reviewing/responding to KES query re binders for dispositive motions hearing.	0.1	
10/17/2024	BBK	Reviewing BM's updates to case task list and emails w/ RBGG team in advance of team meeting on trial prep.	0.2	
10/17/2024	BBK	Reviewing B. Umpierre draft Reply ISO Pls' Daubert Motion re Josh Allen; emailing w/ JSY re same.	0.2	
10/17/2024	BBK	Meeting w/ RBGG team re trial prep.	0.9	
10/17/2024	BBK	Reviewing emails w/ RBGG team re further settlement conferences set by MJ Spero.	0.1	
10/17/2024	BBK	Reviewing/commenting on JSY draft agenda for 10/18 co-counsel meeting; reviewing M. Johnson and KES proposed additions to same.	0.1	
10/17/2024	BBK	Preparing for dispositive motions hearing.	0.8	
10/17/2024	BM	Revise Brookdale case tasks list before internal planning meeting.	1.1	
10/17/2024	BM	Conduct cite check and proofread of Plaintiffs' Objections to Defendants' Reply Evidence in support of their Motion for Summary Judgment.	0.7	
10/17/2024	BM	Meeting with internal RBGG to discuss trial preparation.	0.8	
10/17/2024	BM	Telephone call with KES to discuss filing of Plaintiffs' Objections to Defendants' Reply Evidence in support of Motion for Summary Judgment.	0.1	
10/17/2024	BM	Review initial witness list and trial time estimates from GW before internal trial preparation meeting.	0.2	
10/17/2024	KES	Email team re potential videographer and review files re same.	0.5	
10/17/2024	KES	Update TextMap transcript files and circulate Kennedy transcript.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/17/2024	KES	Efile objections to evidence.	0.3	
10/17/2024	KES	Calendar further settlement conference related deadlines.	0.5	
10/17/2024	KES	Download and circulate pleadings.	0.4	
10/17/2024	KES	Update master depo transcript chart and locate and upload video-synced transcripts.	2.5	
10/17/2024	DLE	Attend and note-take internal trial preparation meeting.	0.9	
10/17/2024	DLE	Finalize and circulate notes from internal trial prep meeting.	0.4	
10/17/2024	DLE	Prep for internal trial prep meeting.	0.1	
10/17/2024	DLE	Confer with KES re summary judgment hearing prep for BBK.	0.3	
10/17/2024	DLE	Make list and compile filings and exhibits for BBK summary judgment hearing prep.	0.7	
10/18/2024	GCG	Text and email JSY re trial preparation meeting.	0.1	
10/18/2024	JSY	Attend team meeting.	1.1	
10/18/2024	JSY	Emails re trial prep documents.	0.1	
10/18/2024	JSY	Multiple emails re pre-trial tasks and division of work.	0.5	
10/18/2024	BBK	Reviewing Ds' Reply ISO Motion to Exclude Certain Opinions of Pls' Experts.	0.2	
10/18/2024	BBK	Conferring w/ DLE re preparing binders for dispositive motions hearing.	0.2	
10/18/2024	BBK	Conferring w/ co-counsel re trial prep.	0.1	
10/18/2024	BBK	Meeting w/ RBGG team and co-counsel re trial prep.	1.7	
10/18/2024	BBK	Debriefing w/ JSY and BM re co-counsel meeting and assignments to RBGG from same.	0.2	
10/18/2024	BBK	Emails w/ RBGG team re preparing exhibits and witness list.	0.1	
10/18/2024	BBK	Preparing for dispositive motions hearing.	0.5	
10/18/2024	BM	Attend meeting with co-counsel to discuss case tasks and pending action items, including trial preparation.	1.7	
10/18/2024	BM	Review and recirculate legal research on use of videotaped deposition testimony during trial to team.	0.3	
10/18/2024	KES	Participate in Zoom meeting with co-counsel re trial prep.	1.7	
10/18/2024	KES	Update master depo chart and prepare version for determination of video-syncing.	0.9	
10/18/2024	KES	Draft shell for master proposed trial exhibit list and consider initial exhibits for upload.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/18/2024	KES	Confer DE re MSJ hearing prep materials.	0.2	
10/18/2024	KES	Review files and follow up with team re missing Def exhibit media file.	0.2	
10/18/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.7	
10/18/2024	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.4	
10/18/2024	DLE	Call with KES re preparing for dispositive motion hearing.	0.1	
10/18/2024	DLE	Confer with BBK and KES re preparing for dispositive motion hearing.	0.2	
10/18/2024	DLE	Prepare materials for BBK for dispositive motion hearing.	1.7	
10/19/2024	JSY	Emails re request for CMC.	0.1	
10/21/2024	GCG	Conf with JSY re trial preparation.	0.6	
10/21/2024	GCG	Conf with BBK re preparation for MSJ oral argument.	0.3	
10/21/2024	GCG	Begin preparing for MSJ moot.	0.1	
10/21/2024	GCG	Email BBK-team re trial preparation.	0.1	
10/21/2024	JSY	(Reduced Charge) Travel back to office from jury selection.	0.2	0.3
10/21/2024	JSY	Meeting with GCG re pretrial tasks.	0.6	
10/21/2024	JSY	Emails re pretrial tasks.	0.1	
10/21/2024	JSY	Prepare memo re jury selection observation; emails re same.	1.0	
10/21/2024	JSY	Prepare memo re pretrial tasks; emails re same.	0.4	
10/21/2024	JSY	Emails re exhibit list.	0.1	
10/21/2024	JSY	Emails re pretrial deadlines.	0.1	
10/21/2024	JSY	Observe jury selection in trial in Judge Gilliam's courtroom.	4.4	
10/21/2024	BBK	Emailing w/ RBGG team and co-counsel re outreach to opposing counsel re requesting CMC to clarify trial and pre-trial issues; reviewing OC response to same.	0.2	
10/21/2024	BBK	Meeting w/ GCG re prep for dispositive motions hearing.	0.5	
10/21/2024	BBK	Emailing w/ DLE re preparing binders for dispositive motions hearing.	0.1	
10/21/2024	BBK	Preparing for dispositive motions hearing.	2.5	
10/21/2024	BBK	Reviewing JSY memo to team re observation of jury selection at Judge Gilliam trial.	0.1	
10/21/2024	BBK	Emailing w/ G. Wallace re Ds' position on Unruh Act coverage of their assisted living facilities.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/21/2024	BBK	Emailing w/ RBGG team re JSY's proposed internal deadlines and assignments for pre-trial tasks.	0.2	
10/21/2024	AHS	Reviewed notes from o-counsel meeting and emailed team re claims memo.	0.7	
10/21/2024	AHS	Drafted memo on remaining claims organized by plaintiff.	0.6	
10/21/2024	BM	Emails re meeting re pretrial tasks.	0.2	
10/21/2024	KES	Upload documents and indiicies to Sharepoint in connection with creation of exhibit lists and exhibits as well as additional doc production.	3.3	
10/21/2024	KES	Follow up re purchase of Sanction licenses for trial presentation.	0.3	
10/21/2024	KES	Gather materials for hearing prep binder.	0.1	
10/21/2024	KES	Update hearing transcripts folder.	0.2	
10/22/2024	GCG	Initial review of motion to strike.	0.1	
10/22/2024	GCG	Confs with JSY and KES re trial preparation.	0.1	
10/22/2024	GCG	Email JSY-GW re Kennedy opp.	0.1	
10/22/2024	JSY	Meeting with AHS and BM re pretrial assignments.	0.7	
10/22/2024	JSY	Emails re MILs and request for CMC.	0.2	
10/22/2024	JSY	Emails re Dr. Barchuk testimony time.	0.2	
10/22/2024	JSY	Emails re various pretrial assignments.	0.4	
10/22/2024	JSY	Conf. w/ GCG re request for CMC.	0.1	
10/22/2024	JSY	Review and edit Opp to Daubert motion re Kennedy.	0.9	
10/22/2024	BBK	Reviewing JSY-M. Johnson emails re proposed MILs and request for CMC.	0.2	
10/22/2024	BBK	Conferring w/ RBGG team re IDing trial exhibits.	0.1	
10/22/2024	BBK	Reviewing JSY follow-up email to co-counsel re pre-trial tasks.	0.1	
10/22/2024	BBK	Reviewing exemplar joint pre-trial brief and exhibits/witness/discovery excerpt lists for Judge Gilliam's current trial; conferring w/ RBGG team re same.	0.3	
10/22/2024	BBK	Planning/preparing for dispositive motions hearing.	5.0	
10/22/2024	AHS	Reviewed emails with co-counsel re pretrial work.	0.3	
10/22/2024	AHS	Worked on memo re: remaining claims organized by Plaintiff.	2.8	
10/22/2024	AHS	Met with JY and BM to discuss pretrial filings.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/22/2024	BM	Meeting with JSY and AHS to discuss internal deadlines and tasks related to pretrial conference filings.	0.7	
10/22/2024	BM	Review docket of Pacific Steel Group v. Commercial Metals Company, 20-cv-07683-HSG, current jury trial before Judge Gilliam and pull exemplar pretrial filings for team review.	1.0	
10/22/2024	BM	Review docket of Pacific Steel Group v. Commercial Metals Company, 20-cv-07683-HSG, current jury trial before Judge Gilliam, to determine timeline of when Judge Gilliam decided dispositive motions in relation to pretrial filings for team review.	0.8	
10/22/2024	BM	Begin reviewing Request for Admission discovery responses from all parties and Interrogatory discovery responses from Plaintiffs as part of pretrial filing required by Judge Gilliam standing order.	0.7	
10/22/2024	KES	Update master depo exhibit chart with post July 2021 exhibits.	4.0	
10/23/2024	GCG	Observe jury trial before Judge Gillian to prepare for trial.	2.2	
10/23/2024	GCG	(Reduced Charge) Travel from court to office.	0.2	0.3
10/23/2024	GCG	Revise memo to file re same.	0.2	
10/23/2024	GCG	Conf with and email JSY re defendants' motion to strike our objection.	0.1	
10/23/2024	GCG	Email w/ JSY re opposition to Kennedy Daubert and focus group.	0.1	
10/23/2024	GCG	Conf with JSY re trial preparation.	0.1	
10/23/2024	GCG	Review draft CMC statement and request for CMC.	0.1	
10/23/2024	JSY	Review memo re trial observation; emails re same.	0.3	
10/23/2024	JSY	Emails re discovery responses.	0.1	
10/23/2024	JSY	Emails re request for CMC.	0.1	
10/23/2024	JSY	Emails and conf. re motion to strike.	0.2	
10/23/2024	JSY	Conf w/ GCG re jury consulting.	0.1	
10/23/2024	JSY	Emails re jury consulting services.	0.1	
10/23/2024	JSY	Emails re Kennedy Daubert opp.	0.1	
10/23/2024	JSY	Emails re pretrial issues.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/23/2024	BBK	Reviewing emails w/ co-counsel/RBGG team re filing joint request for CMC, responding to Ds' Motion to Strike Objections to Reply Evidence, finalizing/filing Opp to Ds' Daubert Motion v. Kennedy, and plan for pre-trial exchanges and filings.	0.2	
10/23/2024	BBK	Reviewing GCG memo re observation of third day of Judge Gilliam's current trial w/ take-aways for trial prep.	0.1	
10/23/2024	AHS	Continued drafting memo on remaining claims organized by plaintiff.	3.2	
10/23/2024	AHS	Reviewed team emails re pretrial work.	0.2	
10/23/2024	BM	Draft chart of Request for Admission responses and Plaintiffs' responses to Defendants' Interrogatories as part of reviewing discovery responses for pretrial filings.	1.6	
10/23/2024	BM	Draft email to team regarding missing Request for Admission responses and Plaintiffs' responses to Defendants' Interrogatories as part of reviewing discovery responses for pretrial filings.	0.4	
10/23/2024	BM	Review Request for Admission responses as part of reviewing discovery responses for pretrial filings.	2.3	
10/23/2024	BM	Review Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of Motion for Summary Judgment.	0.8	
10/23/2024	BM	Conduct legal research in connection with Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of Motion for Summary Judgment.	0.5	
10/23/2024	KES	Review memo re courtroom observations.	0.2	
10/23/2024	KES	Review files for missing discovery requests and responses.	1.0	
10/23/2024	KES	Complete update of master deposition exhibit chart in preparation for trial and exhibit lists.	4.0	
10/23/2024	KES	Download and circulate pleadings.	0.2	
10/23/2024	DLE	Circulate filed pleadings and calendar new deadlines re same.	0.2	
10/24/2024	GCG	Review court order canceling MSJ oral argument.	0.1	
10/24/2024	GCG	Communications w/ co-counsel re same.	0.2	
10/24/2024	GCG	Review potential demonstratives for trial.	0.2	
10/24/2024	GCG	Conf with KES re same.	0.1	
10/24/2024	GCG	Research video demonstrative of barriers experienced by named plaintiffs.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/24/2024	GCG	Email PL re photos for trial demonstratives.	0.1	
10/24/2024	GCG	Review court order setting CMC.	0.1	
10/24/2024	JSY	Emails and conf re cancelation of hearing.	0.2	
10/24/2024	BBK	Reviewing notices taking dispositive motions and related hearings off calendar and setting further CMC; conferring w/ JSY and GCG re same.	0.1	
10/24/2024	AHS	Updated internal case tasks list.	0.4	
10/24/2024	AHS	Read JY/GCG memo re jury selection.	0.5	
10/24/2024	BM	Draft email to co-counsel regarding missing Request for Admission responses and Plaintiffs' responses to Defendants' Interrogatories as part of reviewing discovery responses for pretrial filings.	0.4	
10/24/2024	BM	Draft Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	2.4	
10/24/2024	BM	Conduct legal research for Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.9	
10/24/2024	BM	Revise chart of Request for Admission responses and Plaintiffs' responses to Defendants' Interrogatories as part of reviewing discovery responses for pretrial filings.	0.4	
10/24/2024	BM	Review master spreadsheet of Defendants' responses to Plaintiffs' Interrogatories shared by co-counsel as part of reviewing discovery responses for pretrial filings.	0.2	
10/24/2024	KES	Review order and calendar deadlines.	0.2	
10/24/2024	KES	Update discovery files.	0.2	
10/24/2024	KES	Review documents and gather photos of named plaintiffs for potential use as trial demonstratives.	3.0	
10/24/2024	KES	Review files, reports and online sources for facility photos for potential use as demonstratives.	0.8	
10/24/2024	KES	Check for updated BKD financial statements.	0.3	
10/24/2024	DLE	Save and circulate filed pleading; update office calendar with new deadlines.	0.2	
10/24/2024	DLE	Confer with KES re question about dispositive motion hearing prep.	0.1	
10/25/2024	GCG	Conf with MJ re demonstrative exhibits-videos.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
10/25/2024	GCG	Confs with and emails JSY re trial plan.	0.6	
10/25/2024	GCG	Conf with and email AS re meeting with BJH and demonstrative.	0.3	
10/25/2024	GCG	Conf with PL re trial and demonstratives.	0.2	
10/25/2024	GCG	Conf with and emails KES re demonstrative exhibits for trial.	0.3	
10/25/2024	JSY	Emails re agenda for team meeting.	0.1	
10/25/2024	JSY	Team meeting.	1.5	
10/25/2024	JSY	Conf. w/ GCG re trial prep tasks.	0.3	
10/25/2024	JSY	Emails re mock trial.	0.1	
10/25/2024	JSY	Emails re response to motion to strike reply obj.	0.1	
10/25/2024	AHS	Edited memo re: remaining claims organized by plf.	1.0	
10/25/2024	AHS	Identified exhibits for trial from Defs' rog responses.	1.1	
10/25/2024	AHS	Attended weekly meeting with cocounsel do discuss upcoming deadlines and tasks.	1.5	
10/25/2024	AHS	Consolidated notes and circulated notes and meeting invitations to team post co-counsel meeting.	0.3	
10/25/2024	AHS	Call with GCG re potential demonstrative videos.	0.2	
10/25/2024	BM	Draft Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	2.2	
10/25/2024	BM	Draft email to team circulating draft Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.2	
10/25/2024	BM	Conduct legal research for draft Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	1.4	
10/25/2024	BM	Attend weekly meeting with co-counsel to discuss case status and pending action items.	1.3	
10/25/2024	KES	Participate in team Zoom re trial prep.	1.5	
10/25/2024	KES	Telephone calls with trial exhibit/demonstrative companies re potential assistance with trial.	0.3	
10/25/2024	KES	Brief review of draft witness list, consider potential subpoenas and online research re location of witness.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/25/2024	KES	Update depo transcript coding relating to access barriers for two plaintiffs and create TextMap report for team re same.	1.3	
10/25/2024	KES	Gather Plaintiff declarations, discovery responses and other materials relating to access barriers in connection with trial prep and potential demonstratives.	1.5	
10/25/2024	DLE	Attend and note-take weekly meeting with co-counsel.	1.6	
10/25/2024	DLE	Finalize and circulate notes from weekly meeting with co-counsel.	0.2	
10/25/2024	DLE	Save and circulate filed pleading.	0.1	
10/26/2024	GCG	Communications with JSY re named plaintiffs claims.	0.1	
10/26/2024	JSY	Emails re memo re clients' claims.	0.2	
10/27/2024	GCG	Email AS re script for demonstrative.	0.1	
10/28/2024	GCG	Conf with trial preparation and exhibit vendor and KES re demonstratives for trial.	0.7	
10/28/2024	GCG	Follow up meeting with AS and KES re same.	0.3	
10/28/2024	GCG	Conf with BJH and AS re status of barriers to access at Scotts Valley.	0.3	
10/28/2024	GCG	Review and revise memo to file re same.	0.3	
10/28/2024	GCG	Email GW-team re demonstratives for trial.	0.2	
10/28/2024	GCG	Revise AS memo re plaintiffs' claims.	0.4	
10/28/2024	JSY	Meeting with BBK, AHS, BM re pretrial tasks.	1.1	
10/28/2024	JSY	Emails re meeting re pretrial tasks.	0.1	
10/28/2024	JSY	Emails re meet and confer re pretrial issues.	0.1	
10/28/2024	JSY	Emails re contact from former BKD employee.	0.2	
10/28/2024	JSY	Emails re MIL exemplars; research same.	0.2	
10/28/2024	JSY	Emails re photos of clients for demonstratives.	0.1	
10/28/2024	JSY	Edit opp to motion to strike objections.	0.8	
10/28/2024	JSY	Research re MILs; emails re same.	0.2	
10/28/2024	JSY	Review potential exhibits; emails re same.	0.3	
10/28/2024	JSY	Review memo re BJH; emails re same.	0.2	
10/28/2024	BBK	Reviewing Ds' admin motion to appear remotely at 11/12 CMC and emails w/ OC re same; reviewing Order granting motion.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1053

SERVICES

Date	Person	Description of Services	Hours	Discount
10/28/2024	BBK	Reviewing emails w/ RBGG team re preparing materials for pre-trial exchanges and conferring w/ clients re same.	0.1	
10/28/2024	BBK	Prep trial team site.	0.2	
10/28/2024	BBK	Reviewing proposed demonstratives w/ photographs of plaintiffs.	0.1	
10/28/2024	BBK	Conferring w/ JSY, AHS and BM re meeting re: pre-trial prep tasks.	0.1	
10/28/2024	BBK	Reviewing Pls' Opp to Daubert Motion to exclude Kennedy testimony.	0.2	
10/28/2024	BBK	Reviewing DLE notes from 10/25 co-counsel meeting re: trial prep.	0.2	
10/28/2024	BBK	Conferring w/ co-counsel and RBGG team re meeting and conferring w/ Ds in advance of 10/31 joint statement re: items for discussion at 11/12 CMC; reviewing emails w/ OC re same.	0.2	
10/28/2024	BBK	Emailing w/ RBGG team re preparing demonstrative videos.	0.2	
10/28/2024	BBK	Reviewing VM from former BD employee; emailing w/ co-counsel and JSY re same.	0.1	
10/28/2024	BBK	Reviewing/updating AHS draft updated case task list.	0.1	
10/28/2024	BBK	Meeting w/ JSY, AHS and BM re preparing pre-trial exchanges and filings.	0.9	
10/28/2024	BBK	Emailing w/ RBGG team re MILs.	0.2	
10/28/2024	BBK	Analyzing Ds' Motion to Strike Pls' Objections to Reply Evidence ISO Ds' MSJ and BM draft Opp to same.	0.3	
10/28/2024	BBK	Drafting proposed addition to Opp to Motion to Strike Pls' Objections to Reply Evidence; emailing w/ RBGG team re same.	0.3	
10/28/2024	BBK	Reviewing AHS memo re GCG/AHS phone call w/ B. Jestrabek-Hart re trial prep; conferring w/ RBGG team re same.	0.2	
10/28/2024	AHS	Emailed with team re: filming demonstrative for trial.	0.5	
10/28/2024	AHS	Coordinated logistics for internal team meeting.	0.1	
10/28/2024	AHS	Reviewed team emails re meet and confer.	0.1	
10/28/2024	AHS	Met with JY BBK BM re up-coming pretrial tasks.	1.0	
10/28/2024	AHS	Reviewed Defendants' supplemental rog responses in file to identify missing docs and emailed KS re same.	0.5	
10/28/2024	AHS	Met with GCG and KS to discuss demonstrative videos.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1054

SERVICES

Date	Person	Description of Services	Hours	Discount
10/28/2024	AHS	Conf. w/ named plaintiff with GCG re barriers.	0.4	
10/28/2024	AHS	Drafted memo documenting call with GCG and named plaintiff.	0.7	
10/28/2024	AHS	Reviewed supplemental interrogatories by named Plaintiff.	0.2	
10/28/2024	AHS	Emailed team re call with named plaintiff and supplemental rogs.	0.3	
10/28/2024	BM	Meeting with JSY, BBK, and AHS to discuss status of pretrial filing case tasks and assignments.	1.0	
10/28/2024	BM	Review Request for Admission discovery responses as part of pretrial filing required by Judge Gilliam standing order.	0.3	
10/28/2024	BM	Review JSY edits to Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.3	
10/28/2024	BM	Draft email to co-counsel circulating draft Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.2	
10/28/2024	FGL	Email from/to AHS re potential videographer for videos to use at trial and research previous videographer.	0.2	
10/28/2024	KES	Coordinate Zoom meeting with potential trial demonstrative company; participate in meeting and follow up discussion with GCG.	1.8	
10/28/2024	KES	Prepare newly discovered client docs for production and determine next Bates number; review files and Relativity and confer R. Bonner re same.	1.7	
10/28/2024	KES	Emails AS re plaintiff interrogatories and Defs responses for trial prep.	0.2	
10/28/2024	KES	Export and organize Algarme production from Relativity for JY review for trial exhibits.	0.7	
10/28/2024	KES	Confer AS and DE re potential trial demonstratives.	0.4	
10/28/2024	DLE	Save and circulate filed pleading.	0.1	
10/28/2024	DLE	Confer with KES re video project for demonstratives at trial.	0.1	
10/29/2024	GCG	Attend part of meeting with co-counsel re trial plan proposal and demonstratives.	0.4	
10/29/2024	GCG	Confs with JSY and KES and emails JSY-BBK-EG re scope of trial and proposal to court.	0.3	
10/29/2024	GCG	Conf with JSY re BJH claims.	0.2	
10/29/2024	GCG	Review and respond to TG settlement email.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/29/2024	GCG	Review Judge Spero settlement conference order.	0.1	
10/29/2024	GCG	Email team re notifying client re same.	0.1	
10/29/2024	GCG	Email with videogrpaher re demonstrative video.	0.1	
10/29/2024	JSY	Meet and confer with Defs re trial issues.	0.7	
10/29/2024	JSY	Team meeting re trial issues.	1.2	
10/29/2024	JSY	Multiple conf. with GCG and BBK (separately) re trial issues and trial prep.	1.0	
10/29/2024	JSY	Draft agenda for team meeting.	0.2	
10/29/2024	JSY	Emails re supplemental production from Lytle.	0.1	
10/29/2024	JSY	Review memo re client claims; emails re trial structure.	0.7	
10/29/2024	BBK	Emailing w/ co-counsel re preparing demonstrative re: S. stiner barrier encounters for trial.	0.2	
10/29/2024	BBK	Reviewing MJ Spero order setting further settlement conferences.	0.1	
10/29/2024	BBK	Reviewing JSY proposed agenda for co-counsel meeting re: trial prep.	0.1	
10/29/2024	BBK	Conferring w/ KES and R. Bonner re BBK access to Relativity.	0.2	
10/29/2024	BBK	Emailing w/ RBGG team re finalizing/serving FRCP 26(e) supp doc production by M. Lytle.	0.1	
10/29/2024	BBK	Meeting w/ co-counsel re trial prep and plan for M&C w/ Ds re joint status statement.	1.1	
10/29/2024	BBK	Debriefing w/ JSY re meeting and trial prep tasks.	0.3	
10/29/2024	BBK	Meeting and conferring w/ Ds re joint status statement.	0.6	
10/29/2024	BBK	Preparing/sending notes and high level summary to RBGG team and co-counsel re M&C w/ Ds.	0.2	
10/29/2024	BBK	Phone call w/ JSY re brainstorming implications of Ds' proposed trial plan for plaintiffs.	0.2	
10/29/2024	BBK	Drafting/sending emails to Carlsons and Lindstrom re attending further settlement conference.	0.3	
10/29/2024	BBK	Reviewing/responding to Carlsons and Lindstrom emails re: settlement conference and updating RBGG team re same.	0.1	
10/29/2024	BBK	Emailing w/ JSY and GCG re meeting re implications of Ds' proposed trial plan for clients.	0.1	
10/29/2024	BBK	Emailing w/ RBGG re IDing discovery responses for use at trial.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/29/2024	BBK	Brainstorming implications of Ds' proposed trial plan for clients; emailing w/ JSY & GCG re same.	0.8	
10/29/2024	BBK	Reviewing draft ASH memo re remaining claims organized by client and class; emailing w/ JSY re same.	0.3	
10/29/2024	AHS	Attended part of co-counsel call to discuss upcoming pretrial tasks, etc.	0.8	
10/29/2024	BM	Attend weekly meeting with co-counsel to discuss case status and pending action items.	1.1	
10/29/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	0.8	
10/29/2024	KES	Review order re settlement conference and update calendar re same.	0.7	
10/29/2024	KES	Serve Plaintiff supplement document production; confer team re same.	0.4	
10/29/2024	KES	Emails with R. Bonner re Plaintiff productions.	0.3	
10/29/2024	KES	Emails re potential demonstratives.	0.2	
10/29/2024	KES	Prepare chart of all Plaintiff interrogatory requests and Defs Responses; review and organize requests re same; confer AS re same.	1.3	
10/29/2024	KES	Participate in team Zoom re exhibits and demonstratives.	1.0	
10/29/2024	DLE	Confer with KES re case tasks and statuses.	0.2	
10/29/2024	DLE	Attend and note-take meeting with co-counsel re trial preparation.	1.1	
10/29/2024	DLE	Organize and circulate notes from meeting with co-counsel.	0.4	
10/30/2024	GCG	Confs with and emails JSY and BBK re approach to joint CMC statement and trial planning.	0.6	
10/30/2024	GCG	Meet with GW, MJ, BBK and JSY re same.	0.7	
10/30/2024	GCG	Review and revise joint statement.	0.3	
10/30/2024	GCG	Conf with MJ re video and inspection of Plaintiff's room.	0.5	
10/30/2024	GCG	Review memos to file re inspections.	0.3	
10/30/2024	GCG	Confs with KES and emails team re RS and Tracy allegations.	0.4	
10/30/2024	GCG	Text with SS re video session and meeting.	0.1	
10/30/2024	GCG	Email videogrpaher re same.	0.1	
10/30/2024	GCG	Review and analyze SS residency agreement.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2024	JSY	Emails re settlement conference.	0.1	
10/30/2024	JSY	Multiple conf. w/ BBK re issues re structure of trial; emails re same; draft joint statement re same.	3.3	
10/30/2024	JSY	Meeting with GCG and BBK re trial structure issues; team meeting re same; further emails re same.	1.0	
10/30/2024	JSY	Emails re depo designations.	0.1	
10/30/2024	JSY	Work on trial exhibits.	0.4	
10/30/2024	JSY	Conf. w/ GCG re joint statement re trial process.	0.1	
10/30/2024	JSY	Edit draft joint status report; emails re same.	0.2	
10/30/2024	BBK	Emailing w/ GCG re updating co-counsel w/ our thoughts on the implications of Ds' proposed trial plan for clients.	0.1	
10/30/2024	BBK	Meeting w/ JSY re implications of Ds' proposed trial plan for clients.	0.5	
10/30/2024	BBK	Drafting/sending email to G. Wallace & M. Johnson re implications of Ds' proposed trial plan for clients.	0.6	
10/30/2024	BBK	Meeting w/ JSY re draft joint status report in advance of CMC.	0.2	
10/30/2024	BBK	Emailing w/ JSY, GCG, G. Wallace and M. Johnson re meeting on Ds' proposed trial plan and re: JSY draft joint status report re trial.	0.2	
10/30/2024	BBK	Emailing w/ KES re analysis of Pls' doc productions to ID potential trial exhibits.	0.1	
10/30/2024	BBK	Emailing w/ KES re transcript of Kelly Rubin depo.	0.1	
10/30/2024	BBK	Analyzing exhibits ISO Pls' MPSJ and Pls' Opp to Ds' MSJ for potential inclusion as trial exhibits; emailing w/ RBGG team re same.	1.0	
10/30/2024	BBK	Analyzing depo transcripts to ID additional recommendations for video syncing for trial; emailing w/ RBGG team and co-counsel re same.	0.8	
10/30/2024	BBK	Meeting w/ GCG and JSY in prep for co-counsel meeting re our position on Ds' proposed trial plan.	0.2	
10/30/2024	BBK	Meeting w/ GCG, JSY, G. Wallace and M. Johnson re our position on Ds' proposed trial plan.	0.5	
10/30/2024	BBK	Debriefing w/ JSY re co-counsel meeting re our position on Ds' proposed trial plan.	0.2	
10/30/2024	BBK	Reviewing M. Johnson memo re phone call w/ potential witness.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1058

SERVICES

Date	Person	Description of Services	Hours	Discount
10/30/2024	BBK	Emailing w/ GCG, KES and co-counsel re evidence ISO named Pls' individual claims.	0.2	
10/30/2024	BBK	Reviewing/commenting on JSY's revised draft joint status report re trial issues; emailing w/ GCG, JSY and co-counsel re same.	0.2	
10/30/2024	AHS	Read notes from meet and confer.	0.3	
10/30/2024	AHS	Communicated with named plaintiffs re upcoming settlement conference.	0.3	
10/30/2024	AHS	Emailed with team re: case tasks list and claims memo.	0.2	
10/30/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	4.4	
10/30/2024	KES	Confer GCG re potential trial exhibits and other witness related materials and review documents re same.	1.5	
10/30/2024	KES	Gather and organize documents produced by Carlson and Lindstrom for trial exhibit selection.	1.3	
10/30/2024	KES	Review and circulate Anderson depo errata and update electronic files.	0.2	
10/30/2024	KES	Review and circulate depo chart to team for video sync determination.	0.2	
10/31/2024	GCG	Confs with KES re trial exhibits.	0.3	
10/31/2024	GCG	Conf with and email JC re photo shoot.	0.2	
10/31/2024	GCG	Text with SS re same.	0.2	
10/31/2024	GCG	Conf with and email AS re barriers in SS room.	0.2	
10/31/2024	GCG	Email MJ re meeting re demonstratives.	0.1	
10/31/2024	GCG	Emails BM-GW-team re revisions to draft opposition.	0.1	
10/31/2024	GCG	Conf with and email JSY re edit to joint status report.	0.2	
10/31/2024	JSY	Conf. w/ GCG re joint status report.	0.1	
10/31/2024	JSY	Emails re response to motion to strike objections.	0.1	
10/31/2024	JSY	Review and edit joint status report; emails re same.	0.4	
10/31/2024	JSY	Finalize and file joint report.	0.3	
10/31/2024	JSY	Emails re demonstratives.	0.2	
10/31/2024	JSY	Emails and messages re response to motion to strike objections.	0.2	
10/31/2024	JSY	Emails re meeting re demonstratives.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
10/31/2024	BBK	Reviewing M. Johnson comments/revisions to draft Opp to Ds' Motion to Strike Objections to Reply Evidence; conferring w/ JSY and BM re revising/finalizing same.	0.5	
10/31/2024	BBK	Reviewing/commenting on Ds' proposed revisions to joint status report re trial issues; conferring w/ co-counsel and JSY/GCG re same.	0.3	
10/31/2024	BBK	Reviewing JSY-ER emails re finalizing/filing joint status report re trial issues.	0.1	
10/31/2024	BBK	Reviewing Ds' Reply ISO Daubert Motion v Kennedy.	0.2	
10/31/2024	BBK	Emailing w/ co-counsel re plan for trial demonstratives; meeting w/ contractor re same.	0.2	
10/31/2024	BBK	Reviewing/commenting on AHS updates to case tasklist.	0.3	
10/31/2024	BBK	Reviewing M. Johnson proposed list of trial demonstratives and analysis of barriers encountered by S. Stiner from different sources.	0.3	
10/31/2024	BBK	Emailing w/ co-counsel re photographs of named plaintiffs and other evidence for trial.	0.1	
10/31/2024	BBK	Conferring w/ RBGG team re analyzing docs for trial.	0.3	
10/31/2024	AHS	Reviewed emails re documents, joint status report, draft opposition.	0.6	
10/31/2024	AHS	Read co-counsel memo re: potential witness.	0.2	
10/31/2024	AHS	Discussed document review with KS.	0.8	
10/31/2024	AHS	Reviewed interrogatories for potential trial exhibits.	0.9	
10/31/2024	AHS	Assessed barrier lists to prep for filming demonstrative of named plaintiff.	0.7	
10/31/2024	BM	Review MJT edits to Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.7	
10/31/2024	BM	Review JSY and BBK edits to Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.2	
10/31/2024	BM	Emails regarding revised Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.3	
10/31/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	2.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1060

SERVICES

Date	Person	Description of Services	Hours	Discount
10/31/2024	KES	Create CaseMap test case for potential use with discovery requests and depo excerpt designations for trial exchange; confer AS, BM and BBK re same.	3.5	
10/31/2024	KES	Gather information for team re plaintiff barriers for trial prep.	0.4	
10/31/2024	KES	Review document productions and emails in connection with potential exhibit; emails with team re same.	0.8	
10/31/2024	DLE	Save and circulate filed pleadings.	0.2	
10/31/2024	DLE	Confer with KES re exhibit saving and organizing.	0.2	
11/1/2024	GCG	Prepare for meeting with SS to film day in life demonstrative.	0.4	
11/1/2024	GCG	Emails JC-MJ-team re same.	0.2	
11/1/2024	GCG	Conduct meeting with co-counsel re exhibits and deposition excerpts.	0.9	
11/1/2024	GCG	Conf with and email JSY re same.	0.2	
11/1/2024	GCG	Review and analyze SS barriers.	0.2	
11/1/2024	GCG	Review and analyze Kennedy expert report.	0.2	
11/1/2024	GCG	Meet with TG and GW re potential settlement.	0.4	
11/1/2024	GCG	Follow up conference with GW re same.	0.2	
11/1/2024	GCG	Draft memo to file re same.	0.2	
11/1/2024	GCG	Conf with and email JSY re same.	0.1	
11/1/2024	GCG	Emails AS re memo re plaintiffs' claims.	0.1	
11/1/2024	GCG	Email GW-partners re settlement issues.	0.1	
11/1/2024	JSY	Conf. w/ KES re doc review re exhibits.	0.2	
11/1/2024	JSY	Team meeting.	0.8	
11/1/2024	JSY	Conf. w/ GCG re settlement discussions and pretrial tasks.	0.3	
11/1/2024	JSY	Conf. w/ AHS re pretrial tasks.	0.3	
11/1/2024	JSY	Conf. w/ GCG re pretrial tasks.	0.1	
11/1/2024	JSY	Review JA documents for trial exhibits.	1.5	
11/1/2024	JSY	Emails re RS claims.	0.3	
11/1/2024	JSY	Review memo re settlement discussion.	0.2	
11/1/2024	JSY	Emails re memo re plaintiff claims.	0.2	
11/1/2024	JSY	Emails re contact with SV class member.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1061

SERVICES

Date	Person	Description of Services	Hours	Discount
11/1/2024	JSY	Emails re fees for settlement discussions.	0.1	
11/1/2024	JSY	Emails re damages for clients.	0.3	
11/1/2024	MWB	Review memos re settlement issues.	0.2	
11/1/2024	SJR	Email and conference with GG re status.	0.3	
11/1/2024	BBK	Emailing w/ JSY and BM re finalizing/filing Opp to Ds' Motion to Strike Objections to Reply Evidence.	0.1	
11/1/2024	BBK	Conferring w/ JSY, KES and DLE re plaintiff-specific trial exhibits.	0.2	
11/1/2024	BBK	Meeting w/ co-counsel re trial prep; post-meeting debrief w/ RBGG team.	1.0	
11/1/2024	BBK	Evaluating R. Schmidt's disability claims for trial and reporting to RBGG team re same.	1.0	
11/1/2024	BBK	Emailing w/ JSY and AHS re R. Schmidt's claims.	0.2	
11/1/2024	BBK	Emailing MSN re physical access barriers for blind/low vision people at assisted living facilities.	0.2	
11/1/2024	BBK	Meeting w/ MSN re physical access barriers for blind/low vision people at assisted living facilities.	1.0	
11/1/2024	BBK	Emailing w/ RBGG team re outreach to BD Scotts Valley residents interested in participation in lawsuit.	0.1	
11/1/2024	BBK	Emailing w/ RBGG team re revisions to AHS memo re Pls' surviving claims.	0.1	
11/1/2024	BBK	Emailing w/ co-counsel re supplementing Kennedy Expert Report to include Unruh Act statutory damages for Algarme's claims.	0.1	
11/1/2024	BBK	Reviewing MJ Beeler Discovery Order.	0.1	
11/1/2024	BBK	Reviewing AHS updated case task list.	0.1	
11/1/2024	MSN	(Billing Judgment) Meeting with BBK regarding potential access barriers faced by blind client/plaintiff.	0.0	1.0
11/1/2024	AHS	Discussed Brookdale trial prep and upcoming tasks with DLE.	0.6	
11/1/2024	AHS	Drafted rog response portion of trial exhibit list.	3.3	
11/1/2024	AHS	Attended weekly co-counsel meeting to discuss upcoming tasks and deadlines.	1.0	
11/1/2024	AHS	Updated internal case tasks list.	0.8	
11/1/2024	AHS	Emailed with team re fourth amended complaint and live claims.	0.6	
11/1/2024	AHS	Call with JY re case priorities and tasks.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/1/2024	AHS	Updated plaintiff claims memo.	0.8	
11/1/2024	AHS	Emailed with BBK and JY re MIL.	0.6	
11/1/2024	BM	Weekly meeting with co-counsel to discuss case status and pending action items, including pretrial tasks.	0.9	
11/1/2024	BM	Meeting with GCG, BBK, JSY, AHS, KES, and DLE to debrief after weekly co-counsel meeting.	0.2	
11/1/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	3.1	
11/1/2024	BM	Finalize Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment.	0.4	
11/1/2024	BM	Review final Plaintiffs' Opposition to Defendants' Motion to Strike Plaintiffs' Objections to Defendants' Reply Evidence in Support of their Motion for Summary Judgment before filing.	0.2	
11/1/2024	KES	Review and efile opposition to motion to strike; confer BM re same.	0.4	
11/1/2024	KES	Participate in Zoom meeting with co-counsel re pretrial matters.	1.0	
11/1/2024	KES	Email team re testimony re Stiner barriers.	0.3	
11/1/2024	KES	Create Relativity searches and organize documents for potential exhibits relating to Lytle/Boris and Vallette/Quinlan.	2.8	
11/1/2024	DLE	Confer with AHS re case tasks and assignments.	0.6	
11/1/2024	DLE	Attend and note-take weekly co-counsel meeting.	1.0	
11/1/2024	DLE	Finalize and circulate notes from weekly meeting with co-counsel.	0.4	
11/1/2024	DLE	Add plaintiff documents to exhibit list and folders for upcoming exchanges.	1.6	
11/2/2024	GCG	Review and analyze SS deposition, day 2.	0.4	
11/2/2024	GCG	Conf with SS re meeting at San Ramon.	0.2	
11/2/2024	GCG	Research and plan video demonstrative.	0.5	
11/2/2024	GCG	Review and analyze Kennedy report in preparation for settlement demand.	0.7	
11/2/2024	GCG	Review and analyze memo re interview by MJ of potential witness.	0.4	
11/2/2024	GCG	Draft emails to MJ re pre-trial materials needed.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/2/2024	JSY	Emails re supplemental Kennedy report.	0.1	
11/2/2024	JSY	Emails re pretrial deadlines.	0.1	
11/3/2024	GCG	Email with MJ re planning meeting with SS.	0.1	
11/3/2024	GCG	Review and analyze AX memo to file re damages.	0.1	
11/3/2024	GCG	Conf with, emails and texts with JSY re plan for settlement process.	0.8	
11/3/2024	GCG	Review memos to file re same.	0.2	
11/3/2024	GCG	Email with BBK re pre-trial statement and trial brief.	0.1	
11/3/2024	JSY	Conf w/ GCG re settlement issues.	0.6	
11/3/2024	JSY	Emails re settlement prep.	0.1	
11/3/2024	AHS	Drafted rog response portion of trial exhibit list.	1.6	
11/4/2024	GCG	(Reduced Charge) Travel to meet with SS in San Ramon to prepare video.	1.0	1.0
11/4/2024	GCG	Conf with JSY re same.	0.1	
11/4/2024	GCG	Email JSY-GW re Kennedy supplemental report.	0.2	
11/4/2024	GCG	Meet with JSY and MC re damages research and settlement spreadsheets.	0.5	
11/4/2024	GCG	Emails BBK-team re same and re DRBA research.	0.1	
11/4/2024	GCG	Meet with SS in San Ramon to prepare video.	2.0	
11/4/2024	JSY	Conf. w/ BBK re pretrial tasks.	0.2	
11/4/2024	JSY	Conf. w/ BBK re settlement issues.	0.2	
11/4/2024	JSY	Meeting with GCG and MEC re settlement demand projects.	0.8	
11/4/2024	JSY	Emails re settlement related projects.	0.2	
11/4/2024	JSY	Emails re supplementation of Kennedy report.	0.1	
11/4/2024	JSY	Document review for trial exhibits.	1.0	
11/4/2024	JSY	Work on damages models; emails re same.	0.8	
11/4/2024	BBK	Emails w/ co-counsel re demonstrative video of S. Stiner's encounters w/ access barriers and re: deposition video syncing; emails w/ OC re providing final list of access barriers to be litigated at trial.	0.2	
11/4/2024	BBK	Reviewing AHS memo on pls' surviving claims and drafting comments/proposed revisions to same; emailing w/ AHS re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/4/2024	BBK	Analyzing 2019 and 2024 access barrier reports for Tracy and Fisher Rog Response to ID potential barriers affecting blind people; emailing RBGG team re: potential barriers for Schmidt's Unruh Act claims based on above and meeting w/ MSN.	0.8	
11/4/2024	BBK	Meeting w/ JSY re identifying exhibits and deposition excerpts for pre-trial exchanges.	0.1	
11/4/2024	BBK	Phone call w/ JSY re analysis of Unruh Act statutory damages for named plaintiffs for settlement negotiations.	0.2	
11/4/2024	BBK	Drafting email to DRBA Listserv seeking info re calculating Unruh Act statutory damages.	0.3	
11/4/2024	BBK	Reviewing/commenting w/ RBGG team on DRBA Listserv responses re: calculating Unruh Act damages; conferring w/ JSY and MC re same.	0.4	
11/4/2024	BBK	Reviewing AHS report re phone call w/ BD Scotts Valley resident and member of facility-specific access barrier class.	0.1	
11/4/2024	AHS	Reviewed comments on claims-by-plaintiff memo.	0.2	
11/4/2024	AHS	Finalized and circulated partial exhibit list for trial to team.	0.5	
11/4/2024	AHS	Prepared for call with class member at Scotts Valley.	0.1	
11/4/2024	AHS	Had phone call with class member at Scotts Valley and summarized and circulated notes from call.	0.3	
11/4/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	5.3	
11/4/2024	MEC	Meeting with JSY GCG to discuss settlement research project.	0.4	
11/4/2024	MEC	Meeting with JSY to discuss settlement research project.	0.4	
11/4/2024	MEC	Read materials and did preliminary research into unruh act claims.	1.5	
11/4/2024	MEC	Unruh act research and memo.	2.2	
11/4/2024	KES	Continue review of need for video and/or video syncing for depositions for trial.	1.8	
11/4/2024	DLE	Save and circulate filed pleading.	0.1	
11/4/2024	DLE	Add documents to exhibit list; confer with KES re same.	1.2	
11/5/2024	GCG	Email with JSY and BBK re trial.	0.1	
11/5/2024	GCG	Revise memo to file re meeting with SS.	0.1	
11/5/2024	GCG	Email with GW re injunctive relief component of settlement.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/5/2024	JSY	Document review for trial exhibits; emails re same and re pretrial prep.	1.5	
11/5/2024	JSY	Work on damages model.	0.7	
11/5/2024	JSY	Emails re settlement issues.	0.2	
11/5/2024	JSY	Review draft sealing motion; emails re same.	0.2	
11/5/2024	BBK	Reviewing Law360 articles re: Judge Gilliam's current trial; updating RBGG team re same.	0.1	
11/5/2024	BBK	Emailing w/ RBGG team re preparing witness list, exhibits list, and list of disc responses for pre-trial exchange.	0.3	
11/5/2024	BBK	Follow-up re doc review.	0.1	
11/5/2024	BBK	Analyzing Lindstrom Doc Production to ID trial exhibits.	2.0	
11/5/2024	BBK	Reviewing M. Johnson updates to list of potential MILs; emails w/ co-counsel & RBGG team re master exhibits list.	0.2	
11/5/2024	AHS	Discussed document review for exhibit list with KS.	0.2	
11/5/2024	AHS	Reviewed email from team re: exhibit list.	0.2	
11/5/2024	BM	Review Plaintiffs' responses to Defendants' Interrogatories as part of pretrial filings mandated by Judge Gilliam's standing order.	3.5	
11/5/2024	BM	Draft email to BBK regarding chart of Plaintiffs' responses to Defendants' Interrogatories.	0.4	
11/5/2024	MEC	Response to BBK re unruh act damages.	0.2	
11/5/2024	MEC	Unruh Act research memo.	9.3	
11/5/2024	KES	Order video and video sync for multiple depo transcripts for trial; review status of transcripts, court reporter information and depo chart re same.	2.3	
11/5/2024	KES	Emails wtih team re witness and exhibit lists and update same.	1.1	
11/5/2024	DLE	Add plaintiff documents to exhibit spreadsheet for upcoming exchange.	0.6	
11/6/2024	GCG	Confs with JSY re settlement spreadsheet and research.	0.3	
11/6/2024	GCG	Email JSY-GW re Kennedy supplemental report.	0.1	
11/6/2024	GCG	Review and analyze MC memo re Unruh Act damages.	0.2	
11/6/2024	GCG	Revise memo to file re visit w/ SS.	0.3	
11/6/2024	GCG	Text SS and MJ re same.	0.1	
11/6/2024	GCG	Emails MJ-team re exhibit list.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/6/2024	JSY	Conf. w/ BM and KES re sealing motion.	0.4	
11/6/2024	JSY	Conf. w/ EG re interest for damages analysis.	0.1	
11/6/2024	JSY	Conf. w/ MEC re meeting re settlement issues.	0.1	
11/6/2024	JSY	Conf. w/ BBK and AHS re pretrial tasks; emails re same.	0.3	
11/6/2024	JSY	Work on damages analysis.	3.1	
11/6/2024	JSY	Conf w/ GCG multiple times re damages analysis and Unruh Act memo.	0.6	
11/6/2024	JSY	Conf w/ AHS re trial prep tasks.	0.1	
11/6/2024	JSY	Review and edit ROG and RFA designations memo; emails re same.	1.0	
11/6/2024	BBK	Reviewing emails from OC re draft omnibus sealing motion and supporting documents; emails w/ RBGG team re same.	0.1	
11/6/2024	BBK	Emailing w/ co-counsel re plan for omnibus sealing motion, preparing exhibits list and other docs for pre-trial exchanges, and supplementing Kennedy Expert Report.	0.2	
11/6/2024	BBK	Reviewing GCG memo to team re 11/4 meeting w/ S. Stiner.	0.1	
11/6/2024	BBK	Conferring w/ KES re IDing deposition excerpts and trial exhibits.	0.3	
11/6/2024	BBK	Meeting w/ JSY re pre-trial exchanges and other pre-trial deadlines.	0.2	
11/6/2024	BBK	Reviewing/responding to AHS query re FU w/ intake from putative class member.	0.1	
11/6/2024	BBK	Emails re doc review.	0.4	
11/6/2024	BBK	Emailing w/ KES re identifying trial exhibits from Ds' doc productions.	0.2	
11/6/2024	BBK	Emailing w/ co-counsel re charting evidence and allegations re barriers encountered by Pls.	0.2	
11/6/2024	BBK	Analyzing Carlson doc production to ID potential trial exhibits.	1.0	
11/6/2024	BBK	Meeting w/ KES re trial prep.	0.7	
11/6/2024	BBK	Reviewing T. Close legal memo re: trial demonstratives.	0.2	
11/6/2024	BBK	Emails w/ RBGG team and co-counsel re draft list of citations to ROG/RFA responses for pre-trial exchanges.	0.1	
11/6/2024	BBK	Reviewing JSY damages analysis for named Pls.	0.2	
11/6/2024	BBK	Analyzing Ds' doc production to ID trial exhibits for Carlson and Lindstrom claims.	2.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/6/2024	AHS	Emailed with team re message from current Brookdale resident.	0.4	
11/6/2024	AHS	Discussed upcoming tasks and trial prep with DLE.	0.3	
11/6/2024	AHS	Call with JY re exhibit list.	0.2	
11/6/2024	AHS	Discussed document identification for exhibit list with KES.	0.1	
11/6/2024	AHS	Implemented edits to draft exhibit list from Rogs and RFAs and sent to co-counsel.	1.4	
11/6/2024	AHS	Met with KES to discuss doc review for named plaintiff for exhibit list.	0.4	
11/6/2024	AHS	Responded to intake from family member of current Brookdale resident.	0.1	
11/6/2024	AHS	Reviewed named plaintiff at Hemet's docs for exhibit list.	0.6	
11/6/2024	BM	Telephone call with JSY to discuss Defendants' draft omnibus sealing motion, declaration, and proposed order.	0.3	
11/6/2024	BM	Review draft omnibus motion to seal shared by Defendants along with Declaration of Michael Jacobsen and proposed order.	1.1	
11/6/2024	BM	Revise draft proposed order of omnibus motion to seal with Plaintiffs' position on sealing based on review of documents to be sealed or redacted.	2.5	
11/6/2024	MEC	Additional edits to unruh act research memo.	3.0	
11/6/2024	KES	Download and organize Defs proposed redactions for omnibus motion to seal.	0.4	
11/6/2024	KES	Continue creation of Relativity searches for documents relating to named plaintiffs for potential use as trial exhibits; emails with co-counsel re Plaintiff productions re same; review documents re same.	3.4	
11/6/2024	KES	Follow up re requests for depo video syncs for trial prep.	0.2	
11/6/2024	DLE	Confer with AHS re tasks and deadlines.	0.3	
11/7/2024	GCG	Review and revise draft stipulated injunction.	0.5	
11/7/2024	GCG	Confs with MC and emails GW-JSY re Unruh Act research.	0.6	
11/7/2024	GCG	Meet with GW-team and demonstratives expert to plan trial demonstratives.	1.0	
11/7/2024	GCG	Conf with GW re settlement issues.	0.4	
11/7/2024	GCG	Research and draft letter to named plaintiffs re potential settlement demand.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/7/2024	GCG	Conf with JSY and emails JSY-GW re same.	0.2	
11/7/2024	GCG	Conf with and email KES re barriers and Tracy inspection.	0.2	
11/7/2024	GCG	Emails TG and GW re next settlement meeting.	0.3	
11/7/2024	GCG	Emails with visual evidence re video of SS.	0.2	
11/7/2024	GCG	Revise memo to file re settlement process and issues.	0.3	
11/7/2024	GCG	Review and analyze video of SS.	0.4	
11/7/2024	GCG	Text with SS re same.	0.2	
11/7/2024	JSY	Emails re meeting with PK re supplementing report re damages.	0.2	
11/7/2024	JSY	Meeting re demonstratives, plus team meeting after.	1.1	
11/7/2024	JSY	Meeting re depo designations.	0.4	
11/7/2024	JSY	Emails re sealing motion; conf. re same; research re same.	0.9	
11/7/2024	JSY	Multiple conf. and emails re settlement issues.	0.7	
11/7/2024	JSY	Prep for meeting re demonstratives; emails re same.	0.1	
11/7/2024	JSY	Review and edit letter to named plaintiffs re settlement.	0.3	
11/7/2024	JSY	Emails and conf. re Tracy photos and re inspection.	0.4	
11/7/2024	JSY	Emails and conf. re depo designations; review same.	0.4	
11/7/2024	JSY	Review potential trial exhibits; emails re same.	1.1	
11/7/2024	BBK	Further comm'ns w/ co-counsel re charting named Pls' barrier encounters for trial testimony prep, supp Kennedy Expert Report, and preparing exhibits and witness lists for pre-trial exchange.	0.3	
11/7/2024	BBK	Planning/preparing proposal to JSY and AHS re depo transcript analysis to ID depo excerpts for pre-trial exchanges.	0.6	
11/7/2024	BBK	Meeting w/ JSY and AHS re preparing exhibits and depo designations for pre-trial exchanges.	0.5	
11/7/2024	BBK	Meeting w/ JSY and AHS re preparing exhibits and depo designations for pre-trial exchanges.	0.5	
11/7/2024	BBK	Reviewing BM-JSY-M.Johnson emails re plan for Omnibus Sealing Motion; emailing re same.	0.2	
11/7/2024	BBK	Reviewing emails re settlement negotiations and damages claims.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/7/2024	BBK	Reviewing emails w/ RBGG team and co-counsel re supplementing Waters Expert Report and/or seeking re-inspection of BD Tracy.	0.1	
11/7/2024	BBK	Analyzing deposition transcripts to ID depo excerpts for trial.	1.3	
11/7/2024	BBK	Emailing w/ JSY re analyzing deposition transcripts to ID depo excerpts for trial.	0.1	
11/7/2024	AHS	Reviewed Scotts Valley named plaintiff's docs for exhibit list and emailed team re same.	4.5	
11/7/2024	AHS	Call with BBK and JY re plf document and deposition review for exhibit list.	0.5	
11/7/2024	AHS	Read memo re: settlement discussions.	0.1	
11/7/2024	AHS	Read emails re omnibus motion to seal.	0.2	
11/7/2024	BM	Draft Plaintiffs' section of the draft omnibus motion to seal.	3.0	
11/7/2024	BM	Revise draft proposed order of omnibus motion to seal with Plaintiffs' position on sealing based on review of documents to be sealed or redacted.	2.4	
11/7/2024	BM	Conduct legal research in connection with Plaintiffs' section of omnibus motion to seal.	0.4	
11/7/2024	BM	Draft email circulating draft proposed order for omnibus motion to seal for JSY and team review.	0.4	
11/7/2024	BM	Draft email to co-counsel regarding position on named Plaintiffs' medical records and interrogatory responses for omnibus motion to seal.	0.8	
11/7/2024	BM	Meeting with JSY to discuss named Plaintiffs' medical records and interrogatory responses in connection with draft omnibus motion to seal.	0.3	
11/7/2024	MEC	Circulated unruh act damage award memo to team.	0.1	
11/7/2024	MEC	Updated to Unruh memo.	0.4	
11/7/2024	MEC	Follow up conversation with GCG.	0.2	
11/7/2024	KES	Continue creation of Relativity targeted searches for named Plaintiff-related documents, as well as downloads and organization of documents for attorney review for potential inclusion on trial exhibit list.	3.2	
11/7/2024	KES	Review, gather and emails with team re draft barrier lists and related facility photos.	1.4	
11/7/2024	LHW	(Billing Judgment) Supplemental Conflicts Check - Brookdale Legal VP.	0.0	0.5
11/7/2024	DLE	Save and circulate relevant article.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/7/2024	DLE	Save and circulate memo by co-counsel.	0.1	
11/8/2024	GCG	Zoom meetings with Cvisual Evidence to review and edit SS video.	1.8	
11/8/2024	GCG	Research and draft memo to file re issues to present at CMC.	0.3	
11/8/2024	GCG	Email from Ms. Riley to JSY re CMC.	0.1	
11/8/2024	GCG	Confs with KES re trial exhibits.	0.1	
11/8/2024	GCG	Meet with co-counseling team re pre-trial preparation.	1.0	
11/8/2024	GCG	Emails JSY-BU-BW re revisions to and supplementation of Kennedy Report.	0.3	
11/8/2024	GCG	Emails MJ-BU-GW-JSY re settlement analysis and plan.	0.5	
11/8/2024	GCG	Email GW-TG re same.	0.1	
11/8/2024	JSY	Emails re meeting with PK re supplemental report.	0.1	
11/8/2024	JSY	Emails re costs.	0.1	
11/8/2024	JSY	Conf. w/ GCG re prep for team meeting.	0.1	
11/8/2024	JSY	Meeting with PK, LP, GW re supplemental report.	0.3	
11/8/2024	JSY	Team meeting.	1.5	
11/8/2024	JSY	Draft agenda for team meeting.	0.1	
11/8/2024	JSY	Emails and conf. re settlement issues.	0.1	
11/8/2024	JSY	Emails re sealing motion.	0.1	
11/8/2024	JSY	Emails re trial prep issues.	0.1	
11/8/2024	JSY	Emails re mock trial.	0.1	
11/8/2024	JSY	Further emails re supplementation of PK report.	0.2	
11/8/2024	JSY	Depo review for depo designations.	2.8	
11/8/2024	JSY	Emails re settlement issues.	0.2	
11/8/2024	BBK	Emailing w/ JSY and AHS re analyzing deposition transcripts to ID depo excerpts for pre-trial exchange.	0.2	
11/8/2024	BBK	Emailing w/ RBGG team/co-counsel re IDing exhibits and demonstratives for trial.	0.1	
11/8/2024	BBK	Conferring w/ JSY re Kennedy's Unruh Act damages calculations for Lindstrom.	0.1	
11/8/2024	BBK	Meeting w/ co-counsel re: plan for 11/12 CMC and re prep for pre-trial deadlines.	1.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1071

SERVICES

Date	Person	Description of Services	Hours	Discount
11/8/2024	BBK	Debriefing w/ JSY, BM and AHS re co-counsel meeting and next steps ILO same.	0.5	
11/8/2024	BBK	Reviewing JSY emails w/ opposing counsel re: finalizing/filing of Omnibus Sealing Motion and re: agreeing to exchange exhibits lits rather than actual exhibits on 11/19.	0.1	
11/8/2024	BBK	Meeting w/ KES re preparing exhibits for trial and re: omnibus sealing motion.	0.2	
11/8/2024	BBK	Preparing/sending assignments of deposition transcript analysis for JSY and AHS for identification of depo excerpts for pre-trial exchange; conferring w/ AHS and JSY re same.	0.3	
11/8/2024	BBK	Reviewing Ds' Reply ISO Motion to Strike Objections to Reply Evidence.	0.1	
11/8/2024	BBK	Reviewing/responding to GCG query re: prep for 11/12 CMC.	0.1	
11/8/2024	AHS	Reviewed named plaintiff at Hemet's Def produced docs.	1.4	
11/8/2024	AHS	Attended weekly co-counsel call to discuss pretrial work and case management conference.	1.5	
11/8/2024	AHS	Updated case tasks list.	0.2	
11/8/2024	AHS	Reviewed casemap and textmap functionalities for creating exhibit list for trial.	0.3	
11/8/2024	BM	Meeting with co-counsel to discuss trial preparation and other case tasks and pending action items.	1.0	
11/8/2024	BM	Meeting with JSY, BBK, AHS, KES, and DLE to debrief after co-counsel meeting.	0.4	
11/8/2024	BM	Draft Plaintiffs' section of the draft omnibus motion to seal.	3.9	
11/8/2024	MEC	Additional unruh damage amount research.	1.2	
11/8/2024	KES	Review and organize documents relating to Lindstrom, Carlson and Jestrabek-Hart selected for inclusion for trial exhibit list; emails with BBK, AHS and DLE re same.	3.1	
11/8/2024	KES	Participate in Zoom meeting with co-counsel and follow up with team re pretrial exchanges among other case tasks.	1.3	
11/8/2024	KES	Download and circulate pleading.	0.1	
11/8/2024	KES	Emails with L. Castro re witness depo exhibits.	0.2	
11/8/2024	KES	(Billing Judgment) Review article and organize in file.	0.0	0.2
11/8/2024	KES	Email GCG re HSG standing order.	0.1	
11/8/2024	DLE	Attend and note-take team meeting and firm-only debrief.	1.3	
11/8/2024	DLE	Finalize and circulate notes from team meeting.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/8/2024	DLE	Save and circulate demonstrative images from GCG.	0.2	
11/8/2024	DLE	Upload plaintiff files to exhibit list and exhibit saving folder for upcoming exchange.	1.4	
11/9/2024	GCG	Review and analyze MSJ pleadings and pleading file to prepare for CMC.	1.3	
11/9/2024	GCG	Draft CMC outline.	0.5	
11/9/2024	GCG	Review and analyze motion in limine list.	0.2	
11/9/2024	GCG	Emails with MJ re motions in limine and insurance policies.	0.2	
11/9/2024	GCG	Email BU re conservator issue.	0.1	
11/9/2024	GCG	Emails with BBK and JSY re CMC preparation, jury focus group and pre trial preparation.	0.5	
11/9/2024	GCG	Review and analyze Judge Gilliam standing orders.	0.3	
11/9/2024	GCG	Emails GW-team re same.	0.1	
11/9/2024	JSY	Emails re demonstratives and exhibits.	0.2	
11/9/2024	JSY	Emails re prep for status conference.	0.1	
11/9/2024	JSY	Emails re mock trial.	0.1	
11/9/2024	BBK	Reviewing/commenting on GCG outline for 11/12 CMC.	0.2	
11/9/2024	BBK	Emailing w/ co-counsel and RBGG team re trial exhibits and demonstratives and re: MILs.	0.1	
11/10/2024	GCG	Continued review and analysis of MSJ pleadings in preparation for CMC.	1.7	
11/10/2024	GCG	Revise talking points for CMC.	0.3	
11/10/2024	GCG	Emails GW-MJ-JSY re motions in limine and trial preparation.	0.5	
11/10/2024	JSY	Emails re meeting re pretrial tasks.	0.1	
11/10/2024	BBK	Reviewing JSY comments on GCG outline for 11/12 CMC, and GCG revised version of same incorporating BBK and JSY comments.	0.1	
11/10/2024	BBK	Reviewing emails re: draft revised list of access barriers Pls' will raise at trial.	0.1	
11/10/2024	BBK	Emailing w/ GCG and JSY re meeting on preparing for trial.	0.1	
11/10/2024	BBK	Reviewing/responding to GCG queries re BBK memo re: dispositive motions.	0.2	
11/10/2024	AHS	Read through depo transcripts of EDs and HWDs to identify citations for list of depo excerpts at trial per Judge's standing order.	2.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/10/2024	BM	Draft Plaintiffs' section of the draft omnibus motion to seal.	2.7	
11/11/2024	GCG	Review and analyze summary judgment pleadings.	0.5	
11/11/2024	GCG	Review and revise outline for CMC.	0.5	
11/11/2024	GCG	Confs with GW and JSY and emails team re same and issues to raise with court.	0.4	
11/11/2024	GCG	Meet with MJ, GW, JSY and BU to discuss settlement issues and letter to named plaintiffs.	1.3	
11/11/2024	GCG	Review and revise letter to named plaintiff re potential settlement.	0.2	
11/11/2024	GCG	Email with TG and GW re postponing settlement meeting.	0.1	
11/11/2024	GCG	Review and analyze court's standing order.	0.3	
11/11/2024	GCG	Meet with BBK and JSY to discuss pretrial statement.	0.5	
11/11/2024	GCG	Conf with and emails KES re barrier lists and demonstratives.	0.2	
11/11/2024	GCG	Email DM re barrier lists and demonstratives.	0.3	
11/11/2024	GCG	Conf with GW re potential settlement and preparation for CMC.	0.3	
11/11/2024	GCG	Emails JSY-BM-KES re omnibus motion to seal.	0.2	
11/11/2024	GCG	Revise memo to file re settlement process.	0.3	
11/11/2024	GCG	Email RS re potential witness re transfer difficulty.	0.1	
11/11/2024	GCG	Texts with SS re video of balcony.	0.1	
11/11/2024	GCG	Email BU and HF re meeting to discuss RS barriers.	0.1	
11/11/2024	GCG	Conf with JSY re HF interrogations.	0.1	
11/11/2024	GCG	Conf with and emails MC re Unruh Act and conservator research.	0.3	
11/11/2024	JSY	Emails re mock trial.	0.1	
11/11/2024	JSY	Conf. two times w/ GCG re trial and settlement issues.	0.3	
11/11/2024	JSY	Emails re memo re Unruh Act damages.	0.1	
11/11/2024	JSY	Emails re demonstratives.	0.1	
11/11/2024	JSY	Review sealing motion draft; emails re same.	0.5	
11/11/2024	JSY	Multiple conf. w/ BM and KES re sealing motion issues.	0.5	
11/11/2024	JSY	Meeting re settlement issues.	1.4	
11/11/2024	JSY	Meeting re pretrial tasks.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/11/2024	JSY	Emails re subclass definitions.	0.1	
11/11/2024	JSY	Review sealing pleadings and multiple emails re same.	0.7	
11/11/2024	JSY	Emails re modifications to report; research same.	0.5	
11/11/2024	BBK	Emailing w/ RBGG team and co-counsel re: narrowing proposed MILs.	0.1	
11/11/2024	BBK	Emailing w/ RBGG team and co-counsel re: FU w/ opposing counsel re insurance policies and re: legal research on scope of testimony of court-appointed conservator for conservatee.	0.1	
11/11/2024	BBK	Emailing w/ RBGG team re: omnibus sealing motion and position re: sealing of client medical records.	0.3	
11/11/2024	BBK	Reviewing/revising AHS draft case task list.	0.1	
11/11/2024	BBK	Conferring w/ AHS re analysis of deposition transcripts to identify depo excerpts for trial.	0.1	
11/11/2024	BBK	Conferring w/ JSY and GCG re meeting on preparation for trial and joint pretrial statement.	0.1	
11/11/2024	BBK	Reviewing/responding to GCG queries to prepare for 11/12 CMC.	0.2	
11/11/2024	BBK	Conducting legal research for GCG re form of trial; reporting to GCG re same.	0.6	
11/11/2024	BBK	Analyzing pretrial statement and trial briefs in Judge Gilliam's recently completed trial in prep for meeting w/ GCG and JSY re trial prep.	0.4	
11/11/2024	BBK	Meeting w JSY and GCG re trial prep and strategy for CMC.	0.6	
11/11/2024	BBK	Emailing w/ GCG/JSY and co-counsel re strategy for 11/12 CMC and re potential areas for stipulation w/ Ds.	0.2	
11/11/2024	BBK	Emailing w/ RBGG team and co-counsel re materials for D. Murov to prepare trial demonstratives.	0.1	
11/11/2024	BBK	Analyzing deposition transcripts to ID potential depo excerpts for trial.	4.1	
11/11/2024	AHS	Emailed with team re status of tasks and updated case tasks list.	0.2	
11/11/2024	AHS	Reviewed transcripts of Defendants' resident declarants to identify citations for pre-trial exchange per Judge's standing order.	1.7	
11/11/2024	BM	Revise chart of Interrogatory and Request for Admission responses with additional responses concerning transportation claims and R. Schmidt's discrimination claim.	2.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/11/2024	BM	Revise Plaintiffs' section of omnibus motion to seal based on JSY edits and comments.	0.6	
11/11/2024	BM	Draft email to JSY with questions and comments on revised Plaintiffs' section of omnibus motion to seal.	0.5	
11/11/2024	BM	Draft email to JSY and BBK regarding whether to seal certain portions of named Plaintiffs' medical records as part of omnibus motion to seal.	0.4	
11/11/2024	BM	Conduct legal research regarding whether to seal certain portions of named Plaintiffs' medical records as part of omnibus motion to seal.	0.5	
11/11/2024	BM	Review case law in response to JSY edits and comments to Plaintiffs' section of omnibus motion to seal.	0.4	
11/11/2024	BM	Draft declaration of Brenda Munoz in support of Plaintiffs' section of omnibus motion to seal moving to redact portions of named Plaintiffs' medical records and residency agreements.	1.2	
11/11/2024	BM	Revise proposed order of omnibus motion to seal with respect to named Plaintiffs' residency agreements and medical records.	1.3	
11/11/2024	BM	Revise Plaintiffs' section of omnibus motion to seal to move to redact portions of named Plaintiffs' medical records and residency agreements.	1.7	
11/11/2024	BM	Telephone call with JSY and KES to discuss plan for redacting portions of named Plaintiffs' medical records and residency agreements for omnibus motion to seal.	0.3	
11/11/2024	BM	Telephone call with JSY to discuss Plaintiffs' section of omnibus motion to seal.	0.2	
11/11/2024	BM	Telephone call with KES to discuss redacting portions of named Plaintiffs' medical records and residency agreements as part of omnibus motion to seal.	0.2	
11/11/2024	BM	Draft email circulating Plaintiffs' section of omnibus motion to seal, proposed order, and declaration of Brenda Munoz in support of omnibus motion to seal to co-counsel.	0.2	
11/11/2024	MEC	Call with GCG to discuss updates to memo and additional research.	0.1	
11/11/2024	MEC	Updates to memo and additional research.	2.2	
11/11/2024	MEC	Research into scope of conservatorship testimony.	1.9	
11/11/2024	KES	Review and redact documents in connection with omnibus sealing motion; confer BM and DLE re same; review prior filings and orders in connection with same.	3.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/11/2024	KES	Review and circulate revised draft witness list.	0.2	
11/11/2024	KES	Follow up with team re Quinlan docs for draft exhibit list.	0.2	
11/11/2024	KES	(Billing Judgment) Review and forward depo synching invoices to accounting.	0.0	0.2
11/11/2024	DLE	Confer with KES re redactions for client medical records for omnibus sealing motion.	0.4	
11/11/2024	DLE	Mark redactions for client PII on medical records for omnibus sealing motion.	0.7	
11/12/2024	GCG	Review and analyze summary judgment pleadings.	0.7	
11/12/2024	GCG	Confs with and emails BBK re same and re implications of defendants' arguments for trial.	0.6	
11/12/2024	GCG	Draft demonstrative exhibits for trial.	0.7	
11/12/2024	GCG	Meet with DM and co-counseling team re demonstratives.	0.7	
11/12/2024	GCG	Prepare for CMC.	0.5	
11/12/2024	GCG	(Reduced Charge) Travel to court to conduct CMC.	0.2	0.3
11/12/2024	GCG	(Reduced Charge) Meet with MJ and JSY after court to plan trial exhibits and witness list.	0.2	0.3
11/12/2024	GCG	(Reduced Charge) Travel from court to office.	0.2	0.2
11/12/2024	GCG	Conf with and emails KES re trial preparation.	0.3	
11/12/2024	GCG	Conf with JSY and emails JSY-MJ re omnibus sealing motion.	0.3	
11/12/2024	GCG	Draft and revise memo to file re interview of SS.	0.5	
11/12/2024	GCG	Draft communication to named plaintiffs re trial plan.	0.3	
11/12/2024	GCG	Conduct CMC.	1.0	
11/12/2024	JSY	Meeting re demonstratives.	0.7	
11/12/2024	JSY	(Reduced Charge) Travel to and from status conference.	0.5	0.5
11/12/2024	JSY	Conf. w/ BBK re depo designations.	0.3	
11/12/2024	JSY	Review depo transcript for designations.	0.7	
11/12/2024	JSY	Emails and conf w/ LP re supplemental PK report.	0.3	
11/12/2024	JSY	Emails re exhibit exchange.	0.1	
11/12/2024	JSY	Review and edit sealing pleadings; multiple emails and conf. re same.	1.1	
11/12/2024	JSY	Draft and edit notes from status conference; emails re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/12/2024	JSY	Attend status conference; conf. w/ GCG and MTJ before and after.	1.5	
11/12/2024	BBK	Reviewing GCG's updated outline for CMC.	0.2	
11/12/2024	BBK	Reviewing/responding to GCG query re: expert opinions and discovery.	0.1	
11/12/2024	BBK	Emailing w/ GCG re summarizing/IDing key common area access barriers for demonstrative consultant D. Murov.	0.2	
11/12/2024	BBK	Reviewing Ds' response re proposal on exhibits exchange; conferring w/ co-counsel and JSY re same.	0.1	
11/12/2024	BBK	Meeting w/ demonstratives consultant D. Murov (w/ GCG, MJ, JSY and TC).	0.5	
11/12/2024	BBK	Emailing w/ RBGG team, co-counsel, and D. Murov re photographs and other materials for demonstratives.	0.2	
11/12/2024	BBK	Multiple phone calls w/ JSY re plan for creating text for demonstratives re: common area barriers and for analyzing deposition transcripts to ID depo excerpts.	0.3	
11/12/2024	BBK	Emailing w/ RBGG team and co-counsel re Pls' Portion of Omnibus Motion to Seal and supporting decl.	0.2	
11/12/2024	BBK	Drafting/sending assignment to BM re IDing depo excerpts.	0.2	
11/12/2024	BBK	Further emails w/ BM and JSY re IDing depo excerpts.	0.1	
11/12/2024	BBK	Multiple phone calls w/ GCG re opening statement, demonstratives, and preparations for CMC.	0.5	
11/12/2024	BBK	Conducting legal research re: response to Ds' Unruh Act intentionality argument; emailing results of same to GCG.	0.3	
11/12/2024	BBK	Analyzing common area access barriers for inclusion in demonstratives and drafting text for same.	2.3	
11/12/2024	BBK	Emailing w/ TC re analysis of common area access barriers for inclusion in demonstratives.	0.1	
11/12/2024	BBK	Reviewing JSY report re upshot from CMC and TC w/ JSY re same; emailing w/ co-counsel re meeting on implications of same on 11/13.	0.2	
11/12/2024	BBK	Reviewing emails w/ opposing counsel re: finalizing and filing Omnibus Sealing Motion and supporting pleadings.	0.2	
11/12/2024	BBK	Emailing w/ D. Murov re: narrowed scope of trial and required demonstratives ILO CMC.	0.2	
11/12/2024	BBK	Reviewing JSY's detailed notes from CMC and emailing w/ RBGG team re same.	0.2	
11/12/2024	BBK	Analyzing deposition transcripts to ID depo excerpts for trial.	2.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/12/2024	BM	Revise chart of Interrogatory and Request for Admission responses with additional responses concerning transportation claims and R. Schmidt's discrimination claim.	0.5	
11/12/2024	BM	Proofread omnibus motion to seal and declaration of Brenda Munoz in support of omnibus motion to seal.	0.3	
11/12/2024	BM	Finalize draft proposed order to omnibus motion to seal with citations to portions Plaintiffs are seeking to redact.	1.1	
11/12/2024	BM	Review M. Johnson deposition transcript on transportation and Brookdale's Fleet Safety Policy and mark potential excerpts for use at trial.	4.5	
11/12/2024	BM	Review deposition transcripts of J. Toomer, R. Dolcater, and S. Garner and identify excerpts of testimony for potential use at trial.	1.8	
11/12/2024	BM	Review Defendants' edits to the omnibus motion to seal and proposed order before Plaintiffs sign off on filing.	0.3	
11/12/2024	KES	Review emails re CMC.	0.2	
11/12/2024	KES	Revise draft exhibit list form in light of CMC rulings and email team re same.	0.2	
11/12/2024	KES	Review and select client photos for demonstratives and email GCG re same.	0.7	
11/12/2024	KES	Review and gather documents for demonstratives and email with GCG re same.	0.6	
11/12/2024	KES	Review, revise, further redactions, finalize exhibits and efile BM decl ISO omnibus motion to seal; multiple emails with JY re same; review emails and filings by opposing counsel re omnibus motion; review local rules re same.	3.4	
11/13/2024	GCG	Confs with and emails JSY re trial preparation.	0.5	
11/13/2024	GCG	Review and revise memo to file re SS visit and follow up.	0.4	
11/13/2024	GCG	Research and draft demonstratives for trial.	0.6	
11/13/2024	GCG	Confs with BBK and MC re same.	0.2	
11/13/2024	GCG	Emails DM-team re demonstratives.	0.2	
11/13/2024	GCG	Revise communication to clients re trial planning.	0.2	
11/13/2024	GCG	Email GW re same.	0.1	
11/13/2024	GCG	Conf with and emails GW re opening statement.	0.3	
11/13/2024	GCG	Email GW-defendants re Exhibit A to complaint.	0.2	
11/13/2024	JSY	Emails re team meeting.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/13/2024	JSY	Team meeting, incl. RBGG only portion.	1.5	
11/13/2024	JSY	Emails re MILs.	0.1	
11/13/2024	JSY	Emails with Defs re pretrial meet and confers, etc.	0.1	
11/13/2024	JSY	Emails and conf. re pretrial exchanges.	0.3	
11/13/2024	JSY	Work on settlement analysis; emails re same.	0.4	
11/13/2024	JSY	Prepare stip re extension; emails re same.	0.4	
11/13/2024	JSY	Emails re mock trial proposal.	0.1	
11/13/2024	JSY	Work on depo designations and RFA/ROG designations; emails and conf. re same.	1.2	
11/13/2024	BBK	Reviewing minute entry for 11/12 CMC.	0.1	
11/13/2024	BBK	Prep for meeting w/ co-counsel re pre-trial tasks ILO clarification re scope of trial at CMC.	0.2	
11/13/2024	BBK	Co-counsel meeting re pre-trial prep ILO narrowed scope of trial and post-meeting debrief w/ RBGG team.	1.4	
11/13/2024	BBK	Emailing w/ co-counsel re status of final draft revised Exhibit A to complaint w/ barriers to be litigated at trial.	0.1	
11/13/2024	BBK	Emailing w/ co-counsel & RBGG team re witness list, exhibits list, discovery and deposition designations.	0.3	
11/13/2024	BBK	Phone call w/ G. Wallace re demonstratives; updating RBGG team re same.	0.2	
11/13/2024	BBK	Revising text of demonstrative re common area barriers; sending same to D. Murov.	0.3	
11/13/2024	BBK	Create pleading for Joint Pretrial Statement and Trial Brief.	0.4	
11/13/2024	BBK	Reviewing JSY-E. Rutner emails re meet and confers w/ Ds re pre-trial exchanges and MILs and request for EOT to submit updated trial time estimates.	0.1	
11/13/2024	BBK	Conferring w/ JSY re depo designations and ROG Resp designations.	0.3	
11/13/2024	BBK	Conferring w/ MC re legal research into testimony by conservators.	0.1	
11/13/2024	BBK	Conducting research and drafting text for demonstrative re: Ds' intentional violations of disability access law.	1.3	
11/13/2024	BBK	Conferring w/ co-counsel and RBGG team re demonstratives relating to access barriers.	0.2	
11/13/2024	BBK	Meeting w/ GCG and MR re preparing demonstratives and legal research re conservator testimony.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/13/2024	BBK	Phone call w/ GCG re preparing demonstratives.	0.1	
11/13/2024	BBK	Locating materials for MR to prepare demonstratives and conferring w/ MR re same.	0.3	
11/13/2024	BBK	Emailing w/ JSY re revised Exhibit A to Complaint listing barriers to be litigated at trial.	0.2	
11/13/2024	BBK	Reviewing GCG draft comm'n to clients re court's narrowing of scope of January 2025 trial.	0.1	
11/13/2024	AHS	Attended meeting with co-counsel and with internal team to discuss tasks in light of 11/12 case management conference.	1.4	
11/13/2024	AHS	Emailed with team re research question re interest rates.	0.1	
11/13/2024	AHS	Discussed pretrial schedule and dates with BM.	0.2	
11/13/2024	BM	Revise chart of Interrogatory and Request for Admission responses with additional responses concerning transportation claims and R. Schmidt's discrimination claim.	0.7	
11/13/2024	BM	Attend RBGG meeting with co-counsel to discuss tasks related to pretrial filings.	1.0	
11/13/2024	BM	Attend internal RBGG debrief after meeting with co-counsel to discuss tasks related to pretrial filings.	0.4	
11/13/2024	MEC	Conduct further Conservatorship research.	3.9	
11/13/2024	MEC	Meeting with GCG and BBK re demonstrative assignment.	0.3	
11/13/2024	MEC	Began compiling demonstratives.	0.6	
11/13/2024	KES	Participate in Zoom meeting with co-counsel and follow up with RBGG only re pretrial filings and revisions following CMC.	1.4	
11/13/2024	KES	Confer DLE re revisions to exhibit list in light of narrowed trial scope; review same and make adjustments; emails with team re same.	1.1	
11/13/2024	KES	Review depo designations for pre-trial filings sent to CaseMap; create reports, and revise tagging for first trial issues; emails with team re same.	1.8	
11/13/2024	KES	Review status of client docs for exhibit list and email team re Stiner doc selection.	0.2	
11/13/2024	KES	Review exemplar exhibits and discovery designation lists and email team re same.	0.2	
11/13/2024	KES	Gather additional docs selected for potential exhibits for upload to Sharepoint for exchange.	1.0	
11/13/2024	DLE	Attend and note-take meeting with co-counsel re pre-trial tasks.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/13/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.4	
11/13/2024	DLE	Work in exhibit list to classify documents for trial; confer with KES re same.	0.4	
11/13/2024	DLE	Save and circulate filed pleadings; calendar new deadlines.	0.3	
11/14/2024	GCG	Draft and revise demonstrative exhibits.	0.5	
11/14/2024	GCG	Meet with DM and trial team re same.	0.9	
11/14/2024	GCG	Review and revise TC fleet safety demonstratives.	0.3	
11/14/2024	GCG	Meet with TC and JSY via Zoom re same.	0.5	
11/14/2024	GCG	Conf with and emails RS re class member witnesses.	0.2	
11/14/2024	GCG	Review witness list.	0.2	
11/14/2024	GCG	Review exhibit list.	0.3	
11/14/2024	GCG	Confs with and emails MJ, JSY, and KES re revisions to exhibit, witness and demonstrative lists.	0.5	
11/14/2024	GCG	Conf with MC re legal research re conservator and HF meeting.	0.2	
11/14/2024	GCG	Email BU re HF meeting.	0.1	
11/14/2024	GCG	Emails PL-BBK-JSY re PL testimony re Scotts Valley.	0.2	
11/14/2024	GCG	Revise and send communication to named plaintiffs re scope of trial.	0.3	
11/14/2024	GCG	Text from SS and emails from PL and ML re same.	0.2	
11/14/2024	GCG	Conf with ML re Fountaingrove testimony.	0.2	
11/14/2024	GCG	Research and plan opening statement.	0.2	
11/14/2024	JSY	Conf. w/ JA re trial update.	0.1	
11/14/2024	JSY	Meeting re demonstratives.	0.8	
11/14/2024	JSY	Conf. w/ GCG re exhibit list, demonstratives, and other trial prep.	0.4	
11/14/2024	JSY	Finalize and file stip re extension request; emails re same.	0.2	
11/14/2024	JSY	Review depo designations and RFA/ROG designations; emails re same.	0.3	
11/14/2024	JSY	Review and edit supp. Kennedy report; emails re same.	0.6	
11/14/2024	JSY	Emails re MILs.	0.1	
11/14/2024	JSY	Work on other trial prep tasks, incl. witness list, exhibit list; emails re same.	2.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/14/2024	JSY	Conf. w/ KES re exhibit list.	0.5	
11/14/2024	JSY	Further emails re edits to PK report.	0.2	
11/14/2024	JSY	Emails re FSP demonstratives.	0.1	
11/14/2024	JSY	Draft witness list; emails re same.	1.0	
11/14/2024	JSY	Conf w/ GCG re trial prep tasks.	0.1	
11/14/2024	JSY	Emails re trial prep tasks.	0.4	
11/14/2024	BBK	Reviewing Stipulation re EOT to provide updated trial time estimate.	0.1	
11/14/2024	BBK	Reviewing emails re preparing exhibits lists, demonstratives, witness lists, etc.	0.2	
11/14/2024	AHS	Reviewed updates from team re exhibit list and motions in limine.	0.7	
11/14/2024	AHS	Researched pre-judgment interest rates.	2.3	
11/14/2024	BM	Research exemplars regarding formatting and filing of motions in limine for Judge Gilliam.	0.5	
11/14/2024	BM	Draft Plaintiffs' motion in limine regarding arguments and evidence from Defendants on the direct threat exception.	1.9	
11/14/2024	BM	Review background materials in preparation for drafting Plaintiffs' motion in limine regarding arguments and evidence from Defendants on the direct threat exception.	0.8	
11/14/2024	BM	Draft outline of Plaintiffs' motion in limine regarding arguments and evidence from Defendants on the direct threat exception.	0.7	
11/14/2024	MEC	Completed draft legal text demonstratives.	2.3	
11/14/2024	MEC	Conversation with GCG re scope of conservator testimony.	0.2	
11/14/2024	MEC	Conservator testimony research.	5.5	
11/14/2024	KES	Review and gather photos and documents for demonstratives and upload to Sharepoint folder for exchange; email GCG and JY re same.	1.2	
11/14/2024	KES	Review draft depo designations report and confer JY re issues for finalizing.	0.3	
11/14/2024	KES	Review draft exhibit list and consider potential issues for revisions; multiple emails with JY re same.	0.8	
11/14/2024	KES	Confer with DLE and AJA re efficient comparison of draft exhibit list with depo exhibit list in connection with proper exhibit identification.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/14/2024	KES	Review, revise, update exhibit list; confirm Bates numbers and cross reference depo exhibits corresponding to same; emails with team re same.	5.0	
11/14/2024	KES	Email with R. Bonner re PLTF production.	0.2	
11/14/2024	DLE	Save and circulate filed pleadings.	0.2	
11/14/2024	DLE	Confer with KES re tasks for exhibit list.	0.4	
11/14/2024	DLE	Work on making changes to exhibit list per KES and JSY.	1.1	
11/15/2024	EG	Meeting with GCG and JSY re damages in the Brookdale case and prep for same.	0.8	
11/15/2024	GCG	Review and revise demonstrative exhibits for trial.	1.0	
11/15/2024	GCG	Meet with DM re co-counseling team re same.	1.3	
11/15/2024	GCG	Conf with and emails JSY re exhibit, demonstrative and witness lists.	0.7	
11/15/2024	GCG	Meet via Zoom with trial team re revisions to same.	0.7	
11/15/2024	GCG	Meet via Zoom with HF, BU and MC re RS competency to testify at trial.	0.4	
11/15/2024	GCG	Follow up conf with MC re legal research re conservatorship and follow up to meeting.	0.2	
11/15/2024	GCG	Conf with MR re Scotts Valley.	0.1	
11/15/2024	GCG	Conf with PL re Pat Lindstrom testimony.	0.3	
11/15/2024	GCG	Conf with AS re Scotts Valley witness.	0.1	
11/15/2024	GCG	Email team re same.	0.1	
11/15/2024	GCG	Conf with SS re injunctive relief.	0.1	
11/15/2024	GCG	Meet with EG and JSY re settlement issues and letter to named plaintiffs.	0.4	
11/15/2024	GCG	Emails BBK re demonstratives.	0.2	
11/15/2024	GCG	Review Judge Gillian decision on motion to decertify.	0.1	
11/15/2024	JSY	Team meeting.	1.1	
11/15/2024	JSY	Meeting re settlement issues with GG & GCG.	0.8	
11/15/2024	JSY	Emails re order on motion to decertify.	0.1	
11/15/2024	JSY	Emails re supplemental PK report.	0.1	
11/15/2024	JSY	Meeting re demonstratives and other trial prep issues.	1.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/15/2024	JSY	Work on exhibit list, demonstratives, and other pretrial exchanges; multiple emails and conf. re same.	2.4	
11/15/2024	JSY	Further work on exhibit list.	0.4	
11/15/2024	BBK	Analyzing/revising demonstratives, exhibits list, and witness list; reviewing emails w/ team re same.	3.9	
11/15/2024	BBK	Meeting w/ co-counsel re case tasks.	1.0	
11/15/2024	BBK	Reviewing/sharing w/ RBGG team recent bench trial decision in E.D. Cal. re Title III and Unruh Act claims relevant to settlement negotiations and trial prep.	0.1	
11/15/2024	BBK	Reviewing/commenting on Order Denying Motion to Decertify Subclasses.	0.1	
11/15/2024	AHS	Emailed with team re research projects and exhibits.	0.7	
11/15/2024	AHS	Discussed exhibit spreadsheet with DLE.	0.3	
11/15/2024	AHS	Call with co-counsel re: exhibit spreadsheet.	0.1	
11/15/2024	AHS	Researched prejudgment interest.	0.4	
11/15/2024	AHS	Attended weekly co-counsel meeting.	1.1	
11/15/2024	AHS	Discussed named plaintiff depositions with MEC.	0.2	
11/15/2024	AHS	Met with GCG and sent her materials re class member.	0.2	
11/15/2024	AHS	Reviewed exhibits for trial.	2.5	
11/15/2024	BM	Meeting with co-counsel and RBGG to discuss pretrial filing tasks, including list of exhibits, demonstratives, and evidence to be served on Defendants.	1.1	
11/15/2024	BM	Review exhibits from draft master proposed exhibit list and revise with respect to document descriptions.	3.4	
11/15/2024	BM	Review exhibits from draft master proposed exhibit list and revise with respect to document descriptions based on new batch assignments from JSY.	0.6	
11/15/2024	MEC	Meeting with HF re Unruh Act claims.	0.5	
11/15/2024	MEC	Continued conservator testimony research memo.	4.9	
11/15/2024	MEC	Meeting with Heather Fisher re: scope of knowledge.	0.5	
11/15/2024	MEC	Meeting with GCG re various case issues.	0.3	
11/15/2024	MEC	(Billing Judgment) Conf. with CEJ re conservator testimony research question.	0.0	0.2
11/15/2024	KES	Review and circulate court order.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/15/2024	KES	Participate in Team Zoom re pretrial exchanges and other tasks.	1.1	
11/15/2024	KES	Review exhibit - depo list comparison chart and revise exhibit list re same; email team re same.	1.0	
11/15/2024	KES	Gather and review documents and information in connection with team review of exhibit list for pre-trial exchanges; resolve attorney questions; multiple emails with team re same; additional revisions to exhibit list re same.	5.7	
11/15/2024	DLE	Confer with AHS re assigning exhibits on spreadsheet.	0.3	
11/15/2024	DLE	Attend and note-take meeting with co-counsel.	1.1	
11/15/2024	DLE	Work on adding and cleaning up exhibits to the master exhibit list to exchange with defendants.	2.2	
11/16/2024	GCG	Review and revise demonstrative exhibits for trial.	1.0	
11/16/2024	GCG	Conf with JSY re same and re exhibit and witness list editing.	0.2	
11/16/2024	GCG	Emails KES-team re revisions to exhibit list.	0.2	
11/16/2024	GCG	Emails DM re revisions to demonstratives list.	0.3	
11/16/2024	GCG	Email SJR-VS-JSY re court order and footnote.	0.3	
11/16/2024	GCG	Revise and send email to HF re questions for RS.	0.2	
11/16/2024	GCG	Emails MJ re demonstratives list.	0.2	
11/16/2024	JSY	Emails re order re motion to decertify.	0.3	
11/16/2024	JSY	Work on exhibit list; multiple emails and calls re same.	5.4	
11/16/2024	SJR	Emails re order and status.	0.4	
11/16/2024	BBK	Preparing materials for demonstratives; emailing w/ GCG and D. Murov re same.	1.0	
11/16/2024	BBK	Reviewing emails w/ co-counsel and RBGG team re preparing demonstratives and exhibits list.	0.2	
11/16/2024	BBK	Reviewing GCG email to H. Fisher re prep for trial testimony.	0.1	
11/16/2024	BBK	Emailing w/ JSY and AHS re BD Scotts Valley EDs for exhibits list.	0.1	
11/16/2024	AHS	Reviewed emails re: demonstratives and exhibits.	0.4	
11/16/2024	AHS	Researched and wrote memo on pre-judgment interest on plfs' claims.	3.9	
11/16/2024	AHS	Call with JY re plf Stiner exhibits for trial.	0.2	
11/16/2024	AHS	Reviewed plf Steiner's documents to identify exhibits for trial.	0.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/16/2024	MEC	Read recent decision from ED Cal and updated unruh act research memo.	0.3	
11/16/2024	KES	Review and gather demonstrative photos and docs and email GCG re same.	1.0	
11/16/2024	KES	Create Relativity searches for docs relating to Stiner for addition to exhibit list; review team emails re same.	0.8	
11/16/2024	KES	Review and revise exhibit list to include comments, proper titles and dates for attorney final determination; respond to multiple emails re exhibits; gather PDFs of additional exhibits; confer DLE re additional exhibits and organization.	5.0	
11/16/2024	DLE	Work on uploading exhibits to master exhibit list for pretrial exchange with defendants; review and revise same; confer with KES and JSY re same.	5.1	
11/17/2024	GCG	Review and revise exhibit, witness and demonstrative lists for service.	1.0	
11/17/2024	GCG	Meet with DM and co-counsel to plan demonstratives for trial.	0.9	
11/17/2024	GCG	Meet with co-counseling team to plan meet and confer with defendants.	0.4	
11/17/2024	GCG	Prepare trial testimony.	1.0	
11/17/2024	GCG	Draft and revise demonstratives for trial.	2.1	
11/17/2024	GCG	Meet with Scotts Valley subclass member MR via Zoom.	0.7	
11/17/2024	GCG	Draft memo to file and team re same.	0.3	
11/17/2024	JSY	Emails re prejudgment interest memo; review same.	0.2	
11/17/2024	JSY	Meeting with GCG, MTJ, GW re pretrial prep tasks.	0.8	
11/17/2024	JSY	Work on exhibit list, witness list, and other trial prep tasks; multiple conf. and emails re same.	5.0	
11/17/2024	JSY	Draft proposed process for pretrial filings; emails re same.	1.0	
11/17/2024	JSY	Conf. w/ GCG re trial prep.	0.3	
11/17/2024	MWB	Emails re Order denying class decertification.	0.1	
11/17/2024	BBK	Conferring w/ JSY and GCG re plan for completing and filing materials due on 12/3.	0.2	
11/17/2024	BBK	Emailing w/ RBGG team and co-counsel re preparing demonstratives and exhibits list and witness list.	0.5	
11/17/2024	BBK	Phone call w/ JSY re revising witness list and exhibits list.	0.3	
11/17/2024	BBK	Reviewing/revising GCG draft list of areas of potential stipulation for 11/18 meet and confer.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1087

SERVICES

Date	Person	Description of Services	Hours	Discount
11/17/2024	BBK	Drafting/sending email to G. Wallace re reviewing witness list.	0.1	
11/17/2024	BBK	Reviewing JSY's draft proposed process for pretrial filings for 11/18 meet and confer; emails w/ team re same.	0.2	
11/17/2024	BBK	Emailing/texting w/ JSY re analyzing exhibits added by T. Close from D. Cross Expert Report.	0.1	
11/17/2024	BBK	Analyzing/revising witness list and exhibits list.	3.1	
11/17/2024	AHS	Reviewed exhibits concerning plaintiff Jestrabek-Hart to eliminate duplicates.	1.0	
11/17/2024	AHS	Read and exchanged emails re exhibits and demonstratives.	0.4	
11/17/2024	KES	Review and gather documents and information for demonstratives; emails with GCG re same.	2.2	
11/17/2024	KES	Emails with team re issues in exhibit list review including FSP and barrier lists documents; gather documents re same; review and revise exhibit list and update with additional exhibits.	3.5	
11/17/2024	DLE	Work on uploading exhibits to master exhibit list for pretrial exchange with defendants; review and revise same; confer with KES and JSY re same.	4.5	
11/18/2024	EG	Reviewing document re settlement issues for Brookdale.	0.5	
11/18/2024	GCG	Meet and confer with ER and defendant team re pre-trial issues.	0.5	
11/18/2024	GCG	Review defendants' revisions to factual stipulations.	0.2	
11/18/2024	GCG	Conf with GW, MJ and JSY re defendants' positions and pre-trial filings.	0.4	
11/18/2024	GCG	Confs with and emails JSY re assignments for pre-trial filings.	0.3	
11/18/2024	GCG	Review and analyze bio of new defendant lawyer seeking pro hac vice admission.	0.2	
11/18/2024	GCG	Confs with KES re exhibit list.	0.5	
11/18/2024	GCG	Review and revise demonstrative list.	0.5	
11/18/2024	GCG	Research and draft demonstratives.	1.0	
11/18/2024	GCG	Review case notes to plan trial.	1.0	
11/18/2024	GCG	Revise witness list.	1.0	
11/18/2024	GCG	Emails BBK-MJ-team re same.	0.2	
11/18/2024	GCG	Conf with AS re MIL work.	0.1	
11/18/2024	GCG	Revise exhibit list.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/18/2024	GCG	Emails DM-JU-team re demonstratives.	0.2	
11/18/2024	GCG	Email JSY-ER re same.	0.1	
11/18/2024	GCG	Email MJ re SS issues.	0.1	
11/18/2024	JSY	Meeting with Defendants re pretrial filings.	0.5	
11/18/2024	JSY	Conf. w/ JA re trial testimony.	0.1	
11/18/2024	JSY	Emails re new trial counsel.	0.2	
11/18/2024	JSY	Emails re finalizing PK supp report.	0.2	
11/18/2024	JSY	Emails re settlement.	0.2	
11/18/2024	JSY	Emails re schedule and process for pretrial filings.	0.2	
11/18/2024	JSY	Draft plan for internal assignments for pretrial filings; emails re same.	0.5	
11/18/2024	JSY	Work on pretrial exchanges, including witness list and exhibit list; multiple emails and conf. re same.	6.6	
11/18/2024	BBK	Reviewing Ds' proposed revisions and additions re: areas for stipulation.	0.1	
11/18/2024	BBK	Phone call w/ JSY re plan for drafting joint pretrial statement, proposed neutral statement of case, and trial brief.	0.4	
11/18/2024	BBK	Emailing w/ RBGG team and co-counsel re: Ds' PHV application for trial specialist attorney.	0.1	
11/18/2024	BBK	Researching format and contents of joint neutral statement of case.	0.3	
11/18/2024	BBK	Drafting joint pretrial statement.	0.5	
11/18/2024	BBK	Multiple phone calls w/ JSY re revisions to exhibits list and witness list.	0.7	
11/18/2024	BBK	Analyzing/preparing/revising witness list and exhibits list; conferring w/ team re same.	4.6	
11/18/2024	BBK	Emailing w/ RBGG team and co-counsel re preparing demonstratives.	0.2	
11/18/2024	AHS	Emailed with team re witness list, exhibits, etc.	0.2	
11/18/2024	AHS	Researched state/federal law question for prejudgment interest.	1.2	
11/18/2024	AHS	Discussed upcoming filings with DLE.	0.2	
11/18/2024	AHS	Discussed exhibit list with KS.	0.2	
11/18/2024	AHS	Researched Brookdale executive directors.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/18/2024	AHS	Drafted motion in limine #1.	4.5	
11/18/2024	BM	Conduct legal research in connection with drafting motion in limine to exclude evidence regarding an ADA direct threat affirmative defense.	0.9	
11/18/2024	BM	Draft motion in limine to exclude evidence regarding an ADA direct threat affirmative defense.	4.6	
11/18/2024	FGL	Review GCG, KES emails re new defense counsel S. Moore and run supplemental conflicts check re same.	0.2	
11/18/2024	KES	Review pro hac vice and brief research re new attorney.	0.2	
11/18/2024	KES	Confer JY re exhibit list for pretrial exchange.	0.4	
11/18/2024	KES	Review and revise exhibit list and gather additional exhibits; multiple emails and conferences with team re same and re proper versions of documents for use as exhibits.	3.2	
11/18/2024	KES	Review issues and documents re which exhibits and demonstratives to exchange; confer team re same.	1.2	
11/18/2024	KES	Consider logistics for pretrial exchange.	0.2	
11/18/2024	DLE	Confer with AHS re upcoming pre-trial tasks and deadlines.	0.2	
11/18/2024	DLE	Prepare documents to send to graphic designer for trial demonstratives.	0.5	
11/18/2024	DLE	Discuss with KES additions and edits to current pre-trial exhibit list.	0.8	
11/18/2024	DLE	Review and revise current pre-trial exhibit list; identify and add exhibits to folder to exchange with defendants; make edits to names and other info on exhibit list.	4.0	
11/19/2024	GCG	Review and respond to emails re defendants' position on exchange of demonstratives.	0.5	
11/19/2024	GCG	Meet with DM and co-counseling team to review demonstratives.	0.6	
11/19/2024	GCG	Meet with co-counsel to discuss documents due today.	0.3	
11/19/2024	GCG	Edit demonstratives.	0.2	
11/19/2024	GCG	Begin memo to file re meet and confer with defendants.	0.1	
11/19/2024	GCG	Begin revising MIL list in preparation for meet and confer with defendants.	0.4	
11/19/2024	GCG	Review and revise Direct threat MIL.	1.0	
11/19/2024	GCG	Email MC re cite checking demonstratives.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1090

SERVICES

Date	Person	Description of Services	Hours	Discount
11/19/2024	GCG	Confs with and emails JSY, KS and DE re demonstratives and exhibits for trial and service today.	1.0	
11/19/2024	GCG	Research and draft statement of undisputed facts.	0.6	
11/19/2024	GCG	Review and analyze proposed exhibits for inclusion.	0.5	
11/19/2024	GCG	Emails BBK-team re vision disabilities and legal research for trial.	0.3	
11/19/2024	JSY	Prepare and finalize pretrial exchanges; multiple emails, meetings, and conf. re same.	7.8	
11/19/2024	JSY	Emails and conf. re research re admissibility of exhibits.	0.3	
11/19/2024	JSY	Edit MILs; emails re same.	0.5	
11/19/2024	BBK	Emailing w/ RBGG team and co-counsel re revising and finalizing witness list, exhibits list, depo/ROG/RFA designations, and demonstratives for pre-trial exchange.	1.0	
11/19/2024	BBK	Emailing w/ RBGG team and co-counsel re Ds' proposed compromise re: 1-week EOT for disclosure of demonstratives.	0.2	
11/19/2024	BBK	Conferring w/ RBGG team re legal research into admitting evidence at trial.	0.1	
11/19/2024	BBK	Reviewing/responding to GCG questions re Ds' position on Pls' vision disabilities, evidence of same, and legal standard for qualifying vision disabilities; emailing w/ team and researching same.	1.5	
11/19/2024	BBK	Phone call w/ GCG re undisputed facts, stipulations, and disputed legal issues for pretrial statement.	0.2	
11/19/2024	BBK	Reviewing/responding to GCG queries re: scope of FSP class claims and MIL hearing.	0.2	
11/19/2024	BBK	Drafting joint pretrial statement.	1.6	
11/19/2024	BBK	Reviewing/commenting on AHS draft MIL re evidence going to Title III applicability.	0.3	
11/19/2024	BBK	Reviewing/revising GCG list of undisputed facts and stipulations; emailing re same.	1.6	
11/19/2024	BBK	Reviewing emails w/ opposing counsel re pretrial exchange.	0.1	
11/19/2024	AHS	Reviewed team emails re demonstratives, exhibit list, work plan.	0.7	
11/19/2024	AHS	Looked up information re named plaintiffs from exhibits and rog responses.	1.0	
11/19/2024	AHS	Reviewed team e-mails re exhibits and demonstratives.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/19/2024	BM	Conduct legal research in connection with drafting motion in limine to exclude evidence regarding an ADA direct threat affirmative defense.	0.5	
11/19/2024	BM	Draft motion in limine to exclude evidence regarding an ADA direct threat affirmative defense.	1.3	
11/19/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense based on JSY feedback.	0.4	
11/19/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense based on GCG feedback.	1.2	
11/19/2024	BM	Draft email to GCG and JSY circulating revised draft motion in limine to exclude evidence regarding an ADA direct threat affirmative defense.	0.1	
11/19/2024	MEC	Conf. with AS re various case issues.	0.2	
11/19/2024	MEC	Call with JSY re: scope of research assignment.	0.2	
11/19/2024	MEC	Reviewed demonstratives for issues/nits.	0.3	
11/19/2024	MEC	Evidence questions research.	6.9	
11/19/2024	FGL	Review GCG email re draft potential areas of stipulation doc and revise same.	0.1	
11/19/2024	FGL	Review JSY email re Pltfs' witness list and finalize same.	0.2	
11/19/2024	KES	Review, revise and update exhibit list and confirm additional expert related materials to be included; respond to multiple questions confirming inclusion of various docs on list; cross-reference list with PDFs of exhibits to be exchanged that were not previously produced and review and organize same for exchange; multiple conferences and emails with team re same.	6.0	
11/19/2024	KES	Brief review of all final documents for pretrial exchange and confer GCG and JY re same; serve pretrial exchanges.	1.2	
11/19/2024	DLE	Review and add expert relied upon documents to exhibit list and folder for exhibit exchanging.	1.6	
11/19/2024	DLE	Review and make changes to photos on exhibit list and folder for exhibit exchanges.	0.8	
11/19/2024	DLE	Confer with KES re changes to make to exhibit list and other exchanges.	0.4	
11/19/2024	DLE	Reorder items on exhibit list per JSY.	0.7	
11/19/2024	DLE	Confer with JSY and KES re plan for exhibit list.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/19/2024	DLE	Make additional final changes to exhibit list; confer with KES re same.	1.9	
11/19/2024	DLE	Download and circulate demonstratives.	0.3	
11/19/2024	DLE	Serve exhibit list and other exchanges with KES.	0.3	
11/20/2024	GCG	Review and revise draft MIL list.	0.3	
11/20/2024	GCG	Prepare for meet and confer with defendants re same.	0.1	
11/20/2024	GCG	Revise demonstratives.	0.3	
11/20/2024	GCG	Meet with co-counseling team re pre-trial assignments.	0.6	
11/20/2024	GCG	Initial review of defendants' evidence.	0.2	
11/20/2024	GCG	Confs with and emails JSY re preparation for trial.	0.5	
11/20/2024	GCG	Draft memo re meet and confers.	0.1	
11/20/2024	GCG	Email from ER re meet and confer.	0.1	
11/20/2024	JSY	Emails re pretrial filings.	0.3	
11/20/2024	JSY	Meeting re pretrial filings.	1.0	
11/20/2024	JSY	Emails re Supp PK report.	0.1	
11/20/2024	JSY	Edit trial time estimates; emails re same.	0.5	
11/20/2024	JSY	Work on pretrial filings; review exchanges; multiple conf and emails re same.	2.6	
11/20/2024	BBK	Reviewing Ds' witness list & exhibits list; emailing w/ trial team re same.	0.3	
11/20/2024	BBK	Meeting w/ co-counsel re plan for pretrial filings.	0.5	
11/20/2024	BBK	Meeting w/ JSY re plan for pretrial filings.	0.2	
11/20/2024	BBK	Emailing w/ trial team re: preparing MILs and analyzing/objecting to exhibits and discovery designations; reviewing analyses and memos re same.	0.7	
11/20/2024	BBK	Emailing w/ trial team re serving supp Kennedy Expert Report.	0.1	
11/20/2024	BBK	Reviewing notes from remainder of co-counsel meeting and RBGG team debrief.	0.1	
11/20/2024	BBK	Reviewing GW draft updated trial time estimates and GCG/JSY proposed revisions to same.	0.1	
11/20/2024	BBK	Reviewing emails w/ opposing counsel re meet and confers on pretrial filings and exchanges.	0.1	
11/20/2024	BBK	Researching/drafting joint pretrial statement.	2.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1093

SERVICES

Date	Person	Description of Services	Hours	Discount
11/20/2024	BBK	Reviewing/revising/commenting on updated draft MIL to exclude evidence/argument re: whether facilities qualify as PPAs; emailing w/ AHS and JSY re same.	0.8	
11/20/2024	AHS	Call with co-counsel to discuss Defs' disclosures and next steps.	1.0	
11/20/2024	AHS	Revised motion in limine re public accommodations.	2.1	
11/20/2024	AHS	Reviewed e-mails re upcoming tasks.	0.2	
11/20/2024	AHS	Researched objections to documents and depo designations.	1.4	
11/20/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense based on JSY feedback.	0.2	
11/20/2024	BM	Draft email to entire trial team circulating draft motion in limine to exclude evidence regarding an ADA direct threat affirmative defense for review.	0.2	
11/20/2024	BM	Meeting with RBGG and co-counsel to discuss pretrial filing tasks.	1.0	
11/20/2024	BM	Circulate to team exemplar joint pretrial statement and exhibits from Pacific Steel Group v. Commercial Metals Company, recent trial case in front of Judge Gilliam.	0.3	
11/20/2024	BM	Review Defendants' proposed trial exhibit list and create chart summarizing types of documents on the list.	2.5	
11/20/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense and evidence regarding generalized safety concerns based on MTJ feedback.	0.2	
11/20/2024	MEC	Draft evidence questions research memo.	0.4	
11/20/2024	MEC	Check-in meeting with cocounsel plus break off meeting with JSY BM AS KS.	1.0	
11/20/2024	MEC	Draft evidentiary questions memo.	5.4	
11/20/2024	MEC	Reviewed division of labor for trial.	0.2	
11/20/2024	MEC	(Billing Judgment) Began review of background info.	0.0	0.5
11/20/2024	KES	Participate in team and co-counsel Zoom re pretrial filings.	1.0	
11/20/2024	KES	Review Defendants' pretrial exchanges, including proposed exhibits not previously produced.	0.8	
11/20/2024	KES	Email Defs with Excel version of exchanged exhibit list; brief review and confer JY re same.	0.6	
11/20/2024	KES	Consider issues re comparing P's and D's exhibit list; confer DLE and email to team re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/20/2024	KES	Brief review of supplemental expert report for second trial and serve on Defs by email.	0.3	
11/20/2024	DLE	Partial attendance of meeting with co-counsel to discuss exhibit lists, MILs, other pre-trial tasks.	0.8	
11/20/2024	DLE	Finalize and circulate notes from co-counsel meeting.	0.4	
11/20/2024	DLE	Download and circulate defendants' production of exhibits and other exchanges.	0.4	
11/20/2024	DLE	Confer with KES re creating tracking mechanism for duplicate exhibits between defendants and plaintiff productions.	0.2	
11/20/2024	DLE	Create excel tracking mechanism for duplicate exhibits between defendants and plaintiff productions; circulate to team.	0.7	
11/20/2024	DLE	Confer with BM re question about exhibits.	0.1	
11/21/2024	GCG	Review and revise stipulations and undisputed facts for use in pre-trial statement.	0.7	
11/21/2024	GCG	Conf with and emails BBK re same.	0.2	
11/21/2024	GCG	Meet and confer with defendants' counsel re motions in limine.	1.2	
11/21/2024	GCG	Follow up meeting with co-counsel re MILs and overall strategy.	0.7	
11/21/2024	GCG	Conf with and emails GW re evidence of intent, jury trial and settlement strategy.	0.5	
11/21/2024	GCG	Review correspondence for intent evidence.	0.5	
11/21/2024	GCG	Email MJ-team re retaliation claims.	0.2	
11/21/2024	GCG	Conf with KES and emails team re witness.	0.2	
11/21/2024	GCG	Revise memo to file re meet and confer.	0.1	
11/21/2024	GCG	Confs with and emails JSY re trial and settlement strategy.	0.6	
11/21/2024	GCG	Emails team re objections to evidence.	0.2	
11/21/2024	GCG	Email team re Cindy Baier interview.	0.1	
11/21/2024	GCG	Email MJ re allowing defendants to depose Mastin and Waters.	0.1	
11/21/2024	GCG	Emails with SC re jury selection, focus group and retention for trial.	0.4	
11/21/2024	GCG	Review and analyze witness list.	0.1	
11/21/2024	GCG	Email DM re demonstratives.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/21/2024	JSY	Meeting with MEC re pretrial tasks.	0.7	
11/21/2024	JSY	Meet and confer re MILs; conf. w/ GCG re same.	1.3	
11/21/2024	JSY	Internal meeting re MILs and other trial issues.	0.9	
11/21/2024	JSY	Work on trial prep, including objections to discovery and exhibit list; multiple emails and conf. re same.	3.4	
11/21/2024	BBK	Emailing w/ trial team re analyzing/objecting to exhibits and deposition designations.	0.3	
11/21/2024	BBK	Reviewing emails re preparing trial demonstratives and meeting w/ D. Murov re same; emails re jury consultant meeting.	0.1	
11/21/2024	BBK	Phone call w/ GCG re revising proposed undisputed facts and proposed stipulations for M&C w/ Ds and inclusion in pretrial statement and re: strategy on trying individual Ps' alterations claims.	0.4	
11/21/2024	BBK	Reviewing/revising GCG draft email to GW re alterations claims (including legal and factual research for same).	0.5	
11/21/2024	BBK	Preparing/drafting/revising proposed list of undisputed facts and proposed list of stipulations for pretrial statement.	1.7	
11/21/2024	BBK	Meeting w/ GCG, JSY, GW, MJ, and BU to debrief re next steps ILO M&C w/ Ds re MILs and stipulations.	0.8	
11/21/2024	BBK	Conferring w/ JSY re Pls' position on alterations claims and re: M&C w/ Ds.	0.2	
11/21/2024	BBK	Planning/drafting joint pretrial statement.	0.7	
11/21/2024	BBK	Drafting/sending emails to trial team re: grounds for objections to "happy camper" declarant declarations and deposition designations.	0.4	
11/21/2024	BBK	Reviewing JSY draft email to opposing counsel memorializing status of potential stipulation agreements from M&C and co-counsel comments on same; reviewing M. Johnson draft email to opposing counsel offering further depositions of Mastin and Waters on opinions included in supp expert reports.	0.2	
11/21/2024	BBK	Reviewing BM revised draft MIL seeking to exclude direct threat affirmative defense and general evidence re: safety issues justifying FSP transfer requirement; conducting factual research into Ds' Rog Responses and drafting email to trial team re same.	0.5	
11/21/2024	BBK	Reviewing/responding to GCG query re status of PRA responses.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
11/21/2024	BBK	Analyzing transcript of pretrial conference for Judge Gilliam's recently completed trial for guidance for trial prep and pretrial statement; drafting memo and email to trial team re main takeaways from same.	1.2	
11/21/2024	AHS	Emails with team re pretrial brief and filings due on 12/5.	0.3	
11/21/2024	AHS	Further revised MIL re public accommodation evidence.	1.8	
11/21/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense and evidence regarding generalized safety concerns based on MTJ feedback.	4.3	
11/21/2024	BM	Revise motion in limine to exclude evidence regarding an ADA direct threat affirmative defense and evidence regarding generalized safety concerns based on JSY feedback.	0.9	
11/21/2024	BM	Draft email circulating motion in limine to exclude evidence regarding an ADA direct threat affirmative defense and evidence regarding generalized safety concerns for trial team review.	0.4	
11/21/2024	MEC	Reviewed trial info in advance of meeting with JSY.	0.3	
11/21/2024	MEC	(Billing Judgment) Background info meeting with JSY.	0.0	0.5
11/21/2024	MEC	Reviewed draft notice of appearance created by KS.	0.1	
11/21/2024	MEC	Call with BM to discuss depo designation question.	0.1	
11/21/2024	MEC	Textmap overview with KS.	0.2	
11/21/2024	MEC	Depo designations and counter designations for two "happy camper" deponents.	4.1	
11/21/2024	KES	Confer MEC re CaseMap and update user information for case in connection with depo counterdesignations.	0.7	
11/21/2024	KES	Review pro hac vice filing.	0.1	
11/21/2024	KES	File appearance for MEC and update ECF profile information.	0.4	
11/21/2024	KES	Email team re format of certain pretrial filings.	0.1	
11/21/2024	KES	Review and email information to M. Johnson re locating potential trial witness.	0.3	
11/21/2024	KES	Update exhibit list and confer JY re same; confirm inclusion of certain documents on initial exhibit list.	0.9	
11/21/2024	DLE	Coordinate with KFB re arranging signatures for retainer for trial expert.	0.2	
11/21/2024	DLE	Save and organize internal filing of defendants' produced exhibits.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/22/2024	GCG	Confs with and emails JSY re Unruh Act standards and pre-trial preparation.	0.4	
11/22/2024	GCG	Emails MC-team re Unruh Act jury instructions and research.	0.2	
11/22/2024	GCG	Meet with DM re revisions to demonstrative exhibits.	1.3	
11/22/2024	GCG	Review and revise demonstratives.	0.3	
11/22/2024	GCG	Emails JU-team re same.	0.2	
11/22/2024	GCG	Meet with co-counseling team re witness list update, objections to exhibits, trial time estimates and pre-trial statement.	2.0	
11/22/2024	GCG	Email TC re FSP evidence.	0.1	
11/22/2024	GCG	Meet with RBGG team re updating witness list and MIL work.	0.2	
11/22/2024	GCG	Review TC objections to exhibits.	0.1	
11/22/2024	GCG	Review JSY emails re same.	0.1	
11/22/2024	GCG	Conf with MJ and JSY re witness disclosure.	0.2	
11/22/2024	GCG	Email SC re voir dire questions.	0.1	
11/22/2024	JSY	Multiple conf. and emails re trial prep tasks; work on same.	4.7	
11/22/2024	JSY	Meeting re demonstratives.	1.2	
11/22/2024	JSY	Team meeting.	2.0	
11/22/2024	BBK	Emailing w/ trial team re proposed stipulations and re: time estimates.	0.1	
11/22/2024	BBK	Reviewing/revising BM draft revisions to MIL to exclude evidence/argument re direct threat affirmative defense.	0.3	
11/22/2024	BBK	Conferring w/ JSY and AHS re further revisions to MIL excluding certain evidence that is irrelevant to public accommodation analysis.	0.2	
11/22/2024	BBK	Conferring w/ DLE re identifying pending motions to include in section of joint pretrial statement.	0.1	
11/22/2024	BBK	Meeting w/ trial team re: pre-trial exchanges, filings, and meeting and conferring w/ Ds re same.	2.1	
11/22/2024	BBK	Reviewing/commenting to trial team on Ds' draft trial time estimate for direct exams.	0.1	
11/22/2024	BBK	Emails w/ trial team re anticipated MILs by Ds and plans to oppose same, preparing objections to Ds' exhibits and discovery designations, correcting Pls' witness and exhibit lists, and preparing demonstratives.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/22/2024	BBK	Reviewing/responding to G. Wallace query re demonstratives and FRE 1006 summaries.	0.2	
11/22/2024	BBK	Emailing w/ JSY and GCG re proposed list of undisputed facts and stipulations; emailing same to GW/MJ.	0.2	
11/22/2024	BBK	Analyzing MC's legal research re intent element of Unruh Act claims; emailing w/ RBGG team and sharing additional research w/ team re same.	0.3	
11/22/2024	BBK	Drafting joint pretrial statement.	3.8	
11/22/2024	AHS	Discussed pretrial tasks with DLE.	0.1	
11/22/2024	AHS	Revised motion in limine re public accommodations.	0.7	
11/22/2024	AHS	Attended portion of weekly co-counsel meeting to discuss pretrial filings.	2.0	
11/22/2024	AHS	Reviewed process for deposition objections and counter-designations.	0.3	
11/22/2024	AHS	Met with JY to discuss depo objections and counter-designations.	0.3	
11/22/2024	AHS	Reviewed depo of Ferdinand Buot to identify objections and counter-designations.	1.2	
11/22/2024	AHS	Made additional revisions to MIL #1 re public accommodations and circulated to co-counsel.	0.9	
11/22/2024	AHS	Identified and organized materials to assist with additional deposition review for counter-designations and objections.	0.5	
11/22/2024	BM	Meeting with RBGG and co-counsel to discuss pretrial filing tasks.	2.0	
11/22/2024	BM	Internal meeting with RBGG to debrief after meeting with co-counsel.	0.2	
11/22/2024	BM	Draft objections and identify counter-designations to Defendants' designations from K. Bowman Rule 30(b)(6) Topic 2 and 3 depositions for trial.	4.7	
11/22/2024	BM	Draft email with proposed footnote to Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy in response to BBK feedback.	0.5	
11/22/2024	MEC	Trial team meeting plus additional RBGG specific meeting.	2.1	
11/22/2024	MEC	Research various issues for trial prep.	9.0	
11/22/2024	KES	Revise, finalize and serve corrected witness list and trial time estimates; review documents and information and confer JY re same.	1.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/22/2024	KES	Revise, update and serve corrected exhibit list in PDF and Excel and serve additional documents not previously served in discovery; confer team re same; review and gather documents re same.	2.8	
11/22/2024	KES	Participate in Zoom meeting with co-counsel re pretrial filings.	2.0	
11/22/2024	DLE	Attend and note-take weekly meeting with co-counsel and firm-only debrief.	2.1	
11/22/2024	DLE	Finalize and circulate notes from weekly meeting with co-counsel.	0.4	
11/22/2024	DLE	Discuss case tasks with AHS.	0.1	
11/22/2024	DLE	Review docket and compile pending motions; summarize and send to BBK.	0.4	
11/23/2024	GCG	Review and analyze MC memo re evidentiary issues and exhibit objections.	0.3	
11/23/2024	GCG	Confs with and emails JSY re pleadings and work product due 11/26 per Judge Gilliam order.	0.5	
11/23/2024	GCG	Review and analyze evidence of intent for use at trial.	0.2	
11/23/2024	GCG	Email trial team re motions in limine.	0.2	
11/23/2024	GCG	Review completed demonstratives.	0.4	
11/23/2024	GCG	Emails team re same and re work needed on remaining demonstratives.	0.2	
11/23/2024	JSY	Work on pretrial filings; emails and conf. re same.	1.6	
11/23/2024	BBK	Emailing w/ RBGG team re plan for weekend pre-trial work and check-in meeting re same.	0.1	
11/23/2024	BBK	Emails re draft MILs, preparing demonstratives ,trial time estimates for cross-examinations of Ds' witnesses, and legal research re: Unruh Act intent element and re: conservator testimony.	0.2	
11/23/2024	BBK	Drafting joint pretrial statement.	2.3	
11/23/2024	AHS	Reviewed defendants' deposition designations and identified objections and counter-designations.	2.2	
11/23/2024	AHS	Incorporated edits and circulated updated draft MIL re public accomms to team.	0.6	
11/23/2024	MEC	Completed research on additional pretrial question.	3.2	
11/23/2024	MEC	Adapted unruh act research into memo.	0.3	
11/23/2024	MEC	Completed conservatorship testimony memo.	0.7	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1100

SERVICES

Date	Person	Description of Services	Hours	Discount
11/24/2024	GCG	Meet with JSY and MEC re additional legal research needed re jury trial and intent standard.	0.4	
11/24/2024	GCG	Review and revise MEC memo re same.	0.5	
11/24/2024	GCG	Emails GW-team re same.	0.7	
11/24/2024	GCG	Review and revise motions in limine.	0.5	
11/24/2024	GCG	Emails MJ-team re same.	0.3	
11/24/2024	GCG	Email JSY re meet and confer re MILs and witness time estimates.	0.2	
11/24/2024	GCG	Review and analyze cases re Unruh Act standard.	1.0	
11/24/2024	GCG	Meet with RBGG team re pre-trial statement, exhibit objections and deposition counter-designations.	0.5	
11/24/2024	GCG	Review and analyze sections of pre-trial statement.	0.3	
11/24/2024	GCG	Meet with DM and co-counsel to discuss demonstratives.	1.0	
11/24/2024	GCG	Emails DM-TC re demonstratives.	0.2	
11/24/2024	GCG	Email SC re Voir dire questions.	0.2	
11/24/2024	GCG	Confs with and emails JSY re trial preparation.	0.3	
11/24/2024	GCG	Email BBK re pre trial statement.	0.1	
11/24/2024	GCG	Email BM-AS-team re notice of motion.	0.1	
11/24/2024	GCG	Review and analyze cases re jury trial for 1st trial.	0.4	
11/24/2024	JSY	Team meetings re pretrial filings.	0.9	
11/24/2024	JSY	Work on pretrial filings, incl. exhibit objections and depo and discovery objections; multiple conf. and emails re same.	6.7	
11/24/2024	BBK	Meeting w/ RBGG team re trial prep and preparing pretrial filings and exchanges.	0.5	
11/24/2024	BBK	Emails w/ trial team re preparing demonstratives, drafting/revising MILs, and objecting to evidence and discovery designations.	0.3	
11/24/2024	BBK	Drafting joint pretrial statement.	6.7	
11/24/2024	AHS	Reviewed defendants' deposition designations and identified objections and counter-designations.	5.3	
11/24/2024	AHS	Met with GCG JY BM BBK MEC re pretrial tasks and work to hit 11/26 disclosure deadlines.	0.6	
11/24/2024	BM	Draft objections and identify counter-designations to Defendants' designations from K. Bowman Rule 30(b)(6) Topic 2 and 3 depositions for trial.	7.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1101

SERVICES

Date	Person	Description of Services	Hours	Discount
11/24/2024	BM	Proofread and cite check Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy.	0.9	
11/24/2024	BM	Meeting with GCG, JSY, BBK, AHS, and MEC to check in about pretrial filing tasks.	0.5	
11/24/2024	BM	Email to team re omnibus notice of motion for plaintiff's motions in limine.	0.3	
11/24/2024	MEC	Research check in meeting with JSY and GCG.	0.3	
11/24/2024	MEC	Research on jury trial withdrawal and application of jury trial to claims.	2.5	
11/24/2024	MEC	Internal team check in meeting.	0.7	
11/24/2024	MEC	Additional bifurcation research.	1.5	
11/24/2024	MEC	Completed happy camper depo designation objections and counter designations.	2.6	
11/25/2024	GCG	Prepare for and conduct Zoom meet and confer with defendants' counsel re motions in limine.	0.9	
11/25/2024	GCG	Meet via Zoom with jury consultant to plan voir dire.	0.7	
11/25/2024	GCG	Meet via Zoom with demonstratives expert to plan demonstratives.	2.0	
11/25/2024	GCG	Confs with and emails JSY, BBK and KES pre-trial tasks.	0.8	
11/25/2024	GCG	Confs with BM re revisions to MILs and proposed orders.	0.5	
11/25/2024	GCG	Conf with GW and MJ re defendants' report to delay demonstratives.	0.2	
11/25/2024	GCG	Conf with and emails BU re motion in limine revisions.	0.2	
11/25/2024	GCG	Conf with MJ re MIL proposed order.	0.2	
11/25/2024	GCG	Review and revise joint pre-trial statement.	1.0	
11/25/2024	GCG	Conf with and email KES re demonstratives.	0.2	
11/25/2024	GCG	Email trial team re defendants' newly disclosed witnesses.	0.2	
11/25/2024	GCG	Conf with JSY re same and re supplemental disclosures.	0.2	
11/25/2024	GCG	Emails MJ-team re defendants' alleged ambiguity in standing order.	0.2	
11/25/2024	GCG	Email ER re same.	0.1	
11/25/2024	GCG	Review and revise notice of motion in support of motions in limine and Grunfeld declaration.	0.5	
11/25/2024	GCG	Zoom meeting with BM and KES re MIL issues and filing plan.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/25/2024	GCG	Revise and finalize five MILs and proposed orders.	2.0	
11/25/2024	JSY	Meet and confer re MILs.	0.7	
11/25/2024	JSY	Work on pretrial filings and exchanges; multiple emails and conf. re same.	6.8	
11/25/2024	BBK	Emailing w/ trial team re meet and confer w/ Ds over stipulations and MILs.	0.2	
11/25/2024	BBK	Emailing w/ trial team re parties' corrected witness lists and disputes over whether witnesses were timely disclosed; conferring w/ JSY re same.	0.3	
11/25/2024	BBK	Emailing w/ GCG/JSY re reviewing/revising/commenting on draft joint pretrial statement.	0.1	
11/25/2024	BBK	Phone call w/ GCG re joint pretrial statement and neutral statement of case.	0.1	
11/25/2024	BBK	Reviewing JSY report re M&C w/ Ds on MILs an proposed assignments for opposing same; emails w/ RBGG team re same.	0.1	
11/25/2024	BBK	Drafting proposed joint neutral statement of case.	1.7	
11/25/2024	BBK	Reviewing GCG comments/proposed revisions to joint pretrial statement; revising accordingly.	1.8	
11/25/2024	BBK	Emailing w/ trial team re objections to Ds' exhibits and discovery designations, demonstratives, and MILs.	0.5	
11/25/2024	BBK	Reviewing emails w/ opposing counsel re seeking clarification from court re timing and scope of disclosures of demonstratives; emails w/ trial team re same.	0.2	
11/25/2024	BBK	Reviewing GCG comments/revisions to joint neutral statement of case; revising accordingly.	0.2	
11/25/2024	BBK	Emailing co-counsel re reviewing/commenting on joint pretrial statement and joint neutral statement of case.	0.1	
11/25/2024	BM	Proofread and cite check Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy.	0.7	
11/25/2024	BM	Draft Declaration of Brenda Munoz in Support of Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy.	0.8	
11/25/2024	BM	Proofread and cite check Plaintiffs' Motion in Limine No. 1 regarding excluding evidence on public accommodation.	1.4	
11/25/2024	BM	Revise Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy to bring motion within five page limit.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/25/2024	BM	Revise Plaintiffs' Motion in Limine No. 5 regarding safety concerns related to the Fleet Safety Policy and accompanying Declaration of Brenda Munoz based on GCG feedback.	0.4	
11/25/2024	BM	Conduct legal research as to use of proposed orders and declarations in connection with motions in limine.	0.8	
11/25/2024	BM	Review Defendants' proposed exhibit list to identify whether Exhibit 173 from the K. Bowman Rule 30(b)(6) deposition was designated by Defendants.	0.3	
11/25/2024	BM	Draft Declaration of Guy B. Wallace in Support of Plaintiffs' Motion in Limine No. 4 regarding unpled or irrelevant affirmative defenses.	0.5	
11/25/2024	BM	Draft Proposed Order Granting Plaintiffs' Motion In Limine No. 3 Re: Excluding Arguments or Evidence of Lack of Intent to Discriminate.	0.5	
11/25/2024	BM	Meeting with GCG and KES to discuss plan for filing all of Plaintiffs' Motions in Limine.	0.3	
11/25/2024	MEC	Reviewed/edited deposition designation objections and counter designations.	1.5	
11/25/2024	MEC	Summarized unruh act intent standard cases.	3.0	
11/25/2024	KES	Emails with team re Defs video depo exhibits and review exhibit list re same.	0.2	
11/25/2024	KES	Emails with DLE re organizing Defs exchanges in Sharepoint.	0.2	
11/25/2024	KES	Review and download depo video files and emails with court reporting service re same.	0.5	
11/25/2024	KES	Emails wtih team re exchange of trial demonstratives.	0.2	
11/25/2024	KES	Review and gather information for attorneys in connection with drafting MILs and emails with BM and GCG re same; prepare exhibits for same.	2.2	
11/25/2024	KES	Review and organize pre-trial exchanges.	0.5	
11/25/2024	LHW	Supplemental Conflicts Check - new opposing counsel.	0.5	
11/26/2024	GCG	Revise and oversee e-filing of five MILs and supporting pleadings.	1.2	
11/26/2024	GCG	Confs and emails BM-KES re same.	0.7	
11/26/2024	GCG	Meet with demonstratives expert to discuss revisions to same.	1.3	
11/26/2024	GCG	Review and revise list of demonstratives.	0.4	
11/26/2024	GCG	Confs with JSY, JU and KES and emails team re revisions to demonstratives and service on defendants.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/26/2024	GCG	Meet with JSY and BBK via Zoom to discuss revisions to pre-trial statement and neutral statement.	0.3	
11/26/2024	GCG	Emails ER re illustrative aids and other pre-trial matters and meet and confer schedule.	0.3	
11/26/2024	GCG	Review defendants' motion for clarification.	0.1	
11/26/2024	GCG	Conf with JSY and emails ER-team re same.	0.1	
11/26/2024	GCG	Email team re pleadings due today and plan for completion.	0.1	
11/26/2024	GCG	Email JB-team re pre-trial stipulations and meet and confer.	0.1	
11/26/2024	GCG	Emails BBK-JSY re same and cover email to defendants.	0.2	
11/26/2024	GCG	Revise pre-trial statement.	0.4	
11/26/2024	GCG	Review MJ revisions to joint statement.	0.1	
11/26/2024	GCG	Review and revise email to team re tasks before pre-trial filing.	0.2	
11/26/2024	JSY	Work on pretrial exchanges and filings; multiple emails and conf. re same.	6.1	
11/26/2024	BBK	Emailing w/ trial team re objections to discovery designations, detailed witness examination time and trial length estimate, preparing/finalizing/filing MILs, and preparing/serving demonstratives.	0.6	
11/26/2024	BBK	Conferring w/ trial team re Ds' proposed motion for clarification of deadlines for exchange and filing of illustrative aids; reviewing Ds' motion re same.	0.2	
11/26/2024	BBK	Reviewing OC request to resolve access expert barrier disputes by M&C and emails w/ OC re setting meet and confer for 12/2 on various issues.	0.1	
11/26/2024	BBK	Reviewing Pacific Steel trial briefs to plan Ps' trial brief.	0.3	
11/26/2024	BBK	Meeting w/ JSY and GCG re joint pretrial statement.	0.4	
11/26/2024	BBK	Researching/responding to GCG questions re expert disclosures re opinion on version of CBC to use for barrier remediation.	0.3	
11/26/2024	BBK	Revising joint pretrial statement per comments by co-counsel; emailing w/ co-counsel re same.	2.3	
11/26/2024	BBK	Revising joint neutral statement of case per comments by co-counsel; emailing w/ co-counsel re same.	0.2	
11/26/2024	BBK	Attending to finalizing/serving Ds w/ draft joint pretrial statement and joint neutral statement of the case (including comm'ns w/ GCG, JSY, GW and MJ re same).	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/26/2024	BBK	Reviewing Pls' final MILs.	0.5	
11/26/2024	BM	Draft Proposed Orders Granting Plaintiffs' Motions in Limine Nos. 2, 4, and 5.	1.3	
11/26/2024	BM	Revise Plaintiffs' Motion in Limine No. 4 regarding unpled or irrelevant affirmative defenses to add cite to Declaration of Guy B. Wallace in support of Plaintiffs' Motion in Limine No. 4.	0.1	
11/26/2024	BM	Draft list of filing status for all of Plaintiffs' Motions in Limine and associated documents for GCG review.	0.8	
11/26/2024	BM	Review Plaintiffs' Motion in Limine No. 3 regarding evidence of lack of discriminatory intent before it is finalized for filing.	0.2	
11/26/2024	BM	Review Plaintiffs' Motion in Limine No. 5 regarding Fleet Safety Policy safety concerns before it is finalized for filing.	0.2	
11/26/2024	BM	Revise list of filing status for all of Plaintiffs' Motions in Limine and associated documents for GCG review.	0.3	
11/26/2024	BM	Review and edit Notice of Plaintiffs' Motions in Limine Nos. 1-5 and Declaration of Gay C. Grunfeld in support of Plaintiffs' Motions in Limine Nos. 1-5 for GCG review.	0.3	
11/26/2024	BM	Review and revise as necessary Proposed Orders Granting Plaintiffs' Motions in Limine Nos. 1-5 based on GCG feedback.	0.4	
11/26/2024	BM	Update list of filing status for all of Plaintiffs' Motions in Limine and associated documents for GCG review.	0.3	
11/26/2024	BM	Meeting with GCG and KES to discuss filing Plaintiffs' Motions in Limine.	0.2	
11/26/2024	BM	Telephone Call with KES to discuss filing Plaintiffs' Motions in Limine.	0.2	
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/26/2024	BM	Telephone call with GCG to discuss status of Plaintiffs' Motions in Limine and associated documents, including declarations, exhibits, and proposed orders.	0.1	
11/26/2024	BM	Review Declarations of Brenda Munoz and Guy B. Wallace and accompanying exhibits in connection with finalizing Plaintiffs' Motions in Limine Nos. 4 and 5.	0.3	
11/26/2024	MEC	Unruh Act intent standard summaries.	6.4	
11/26/2024	KES	Plan for final exhibit tagging in Relativity and email R. Bonner re same.	0.3	
11/26/2024	KES	Review, suggest revision, finalize and efile trial time estimate; download and circulate filed doc.	0.6	
11/26/2024	KES	Download and circulate Defs filed motions in limine.	0.7	
11/26/2024	KES	Review, finalize, efile Plaintiffs' MILS; email Word versions to chambers.	3.2	
11/26/2024	KES	Download and organize Defs' demonstratives.	0.4	
11/26/2024	KES	Assist with preparation of demonstratives for exchange; emails with team re same and review documents re re same.	1.8	
11/26/2024	KES	Review and circulate Defs motion.	0.2	
11/26/2024	KC	Print document for GCG.	0.1	
11/26/2024	KC	Organize trial binder for GCG.	0.4	
11/27/2024	GCG	Emails courtroom deputy re notice of motion for MILs.	0.2	
11/27/2024	GCG	Confs with KES re same.	0.3	
11/27/2024	GCG	Revise and file notice of motion for MILs.	0.5	
11/27/2024	GCG	Review court order re trial time estimate.	0.1	
11/27/2024	GCG	Research and draft response/joint statement re same.	1.0	
11/27/2024	GCG	Conf with MWB re jury issues, demonstratives and overall strategy.	0.4	
11/27/2024	GCG	Research Brookdale demonstratives for objections.	1.0	
11/27/2024	GCG	Emails trial team re same.	0.2	
11/27/2024	GCG	Conf with JU and TC re objections to defendants' demonstratives.	0.2	
11/27/2024	GCG	Review and analyze same.	0.8	
11/27/2024	GCG	Conf with GW re jury instructions and waiving a jury.	0.2	
11/27/2024	GCG	Conf with KS re jury waiver.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/27/2024	GCG	Emails KS-GW re same.	0.2	
11/27/2024	GCG	Review draft jury instructions.	0.2	
11/27/2024	GCG	Confs with MEC re objections to exhibits.	0.2	
11/27/2024	GCG	Conf with and emails JSY re objections to deposition designations and overall strategy.	0.2	
11/27/2024	GCG	Conf with BM re MIL opposition.	0.1	
11/27/2024	GCG	Conf with BBK re trial brief.	0.2	
11/27/2024	GCG	Meet with trial team to discuss objections, demonstratives and jury instructions.	0.4	
11/27/2024	JSY	Two conf. w/ GCG re trial prep issues.	0.3	
11/27/2024	JSY	Conf. w/ MEC re exhibit objection responses.	0.2	
11/27/2024	JSY	Work on trial prep, incl. responses to objections; multiple emails re same.	6.8	
11/27/2024	MWB	Conferences with GCG and emails re trial strategy, jury trial v. bench.	0.7	
11/27/2024	BBK	Conferring w/ JSY and GCG re postponing 11/27 meet and confer w/ Ds; reviewing emails w/ opposing counsel re same.	0.2	
11/27/2024	BBK	Conferring w/ RBGG team re: addressing Clerk's direction re: noticing MILs.	0.5	
11/27/2024	BBK	Reviewing GCG email to trial team re assignments and plan for 12/3 filings.	0.1	
11/27/2024	BBK	Emailing w/ trial team re Ds' objections to exhibits and discovery designations and Ds' demonstratives.	0.1	
11/27/2024	BBK	Phone call w/ GCG re approach for trial brief.	0.2	
11/27/2024	BBK	Reviewing Ds' 3 MILs.	0.3	
11/27/2024	BBK	Reviewing/responding to JSY query re Rog designations.	0.2	
11/27/2024	BBK	Conferring w/ trial team re responding to Ds' objections to discovery designations and to exhibits & objections to Ds' demonstratives.	0.2	
11/27/2024	BBK	Reviewing Court Order directing parties to file supplemental statement re joint estimate of trial time.	0.1	
11/27/2024	BBK	Meeting w/ co-counsel re plan for 12/3 filings.	0.4	
11/27/2024	BBK	Emails and phone call w/ BM re strategy for opposing MIL seeking to exclude evidence re: FSP.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/27/2024	BBK	Reviewing/responding to GCG queries re legal research into lengthy ND Cal trials; conducting research and reporting on same.	0.7	
11/27/2024	BBK	Drafting trial brief.	1.5	
11/27/2024	BBK	Reviewing Brookdale's demonstratives.	0.3	
11/27/2024	BBK	Conferring w/ trial team re serving Pls' draft jury instructions and proposed voire dire to Ds.	0.2	
11/27/2024	BM	Draft Plaintiffs' Opposition to Defendants' Motion in Limine No. 3 regarding statewide enforcement and implementation of the Fleet Safety Policy.	4.7	
11/27/2024	BM	Conduct legal research in connection with Plaintiffs' Opposition to Defendants' Motion in Limine No. 3 regarding statewide enforcement and implementation of the Fleet Safety Policy.	0.7	
11/27/2024	BM	Telephone call with GCG to discuss drafting Plaintiffs' Opposition to Defendants' Motion in Limine regarding enforcement and implementation of the Fleet Safety Policy.	0.1	
11/27/2024	BM	Telephone call with BBK to discuss drafting Plaintiffs' Opposition to Defendants' Motion in Limine regarding enforcement and implementation of the Fleet Safety Policy.	0.2	
11/27/2024	BM	Meeting with RBGG and co-counsel to discuss status and pending action items in connection with pretrial filing tasks.	0.5	
11/27/2024	BM	Review Defendants' Motion in Limine No. 3 regarding statewide enforcement and implementation of the Fleet Safety Policy.	0.4	
11/27/2024	BM	Review Defendants' supplemental responses to Plaintiff Lindstrom's Interrogatories, Set 3 for JSY in connection with Plaintiffs' responses to their objections.	0.2	
11/27/2024	BM	Review previous discovery briefing in connection with drafting Plaintiffs' Opposition to Defendants' Motion in Limine No. 3 regarding statewide enforcement and implementation of the Fleet Safety Policy.	0.6	
11/27/2024	MEC	Call with GCG re case tasks.	0.2	
11/27/2024	MEC	Email to trial team re: draft exhibit objection response lang.	0.3	
11/27/2024	MEC	Cleaned up unruh intent case summary memo.	0.4	
11/27/2024	MEC	Call with Rachel Steyer re: division of labor re exhibit objection responses.	0.1	
11/27/2024	MEC	Trial team meeting to discuss pre trial task division of labor.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/27/2024	MEC	Call with Rachel Steyer re division of labor for exhibit objection responses.	0.2	
11/27/2024	MEC	Research re extended trial times for response to court order.	0.5	
11/27/2024	MEC	Call with JSY re: responses to exhibit objections.	0.2	
11/27/2024	MEC	Call with KS re responses to exhibit objections project.	0.3	
11/27/2024	MEC	Research case cites for response to court order re trial length.	0.3	
11/27/2024	MEC	Responses to Defendants' objections to exhibit list.	5.0	
11/27/2024	MEC	Call with KS re finding docs for responses to objections.	0.2	
11/27/2024	KES	Assist with research for trial length issue.	0.8	
11/27/2024	KES	Consider organization issues for trial documents and confer DLE and KH re same.	0.8	
11/27/2024	KES	Review and circulate court order.	0.1	
11/27/2024	KES	Review clerk's notice re noticing MILS and confer GCG and BM re same; review rules re same; assist with preparation and finalization of revised Notice of Motion and efile same.	1.7	
11/27/2024	KES	Confer MEC re responses to exhibit list objections and exhibit list and gather RFAs re genuineness of documents for same.	0.6	
11/27/2024	DLE	Attend and note-take meeting with co-counsel re pre-trial tasks.	0.5	
11/27/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.2	
11/27/2024	DLE	Pull and circulate document for MEC.	0.1	
11/27/2024	DLE	Save and circulate last night's filed pleadings.	0.5	
11/27/2024	DLE	Pull and circulate document for JSY.	0.1	
11/27/2024	DLE	Pull and circulate document for MEC.	0.1	
11/27/2024	DLE	Call with KES to discuss upcoming tasks.	0.2	
11/28/2024	GCG	Review and analyze email from GW re jury trial waiver.	0.1	
11/28/2024	GCG	Email GW-team re meeting to discuss jury waiver.	0.1	
11/28/2024	JSY	Draft responses to objections to depo designations.	0.8	
11/28/2024	JSY	Work further on depo designation objections.	1.7	
11/29/2024	GCG	Emails KES re demonstrative objections list and objections.	0.2	
11/29/2024	GCG	Review and analyze defendants' demonstratives.	0.3	
11/29/2024	GCG	Meet via Zoom with GW, MJ, KS, BU and JSY to discuss trial.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1110

SERVICES

Date	Person	Description of Services	Hours	Discount
11/29/2024	GCG	Draft and revise email to class representatives re same.	0.2	
11/29/2024	JSY	Review and edit MIL opp.	0.3	
11/29/2024	JSY	Work on pretrial filings, incl. responses to objections to depo designations.	1.5	
11/29/2024	JSY	Meeting re converting to bench trial; emails re same.	0.5	
11/29/2024	BM	Draft responses to objections made by Defendants to Plaintiffs' proposed deposition testimony designations in connection with pretrial filings required by the Court.	4.5	
11/29/2024	MEC	Email to rachel steyer re objection response project.	0.1	
11/29/2024	MEC	Worked on responses to Defs objections to our proposed exhibits.	6.2	
11/29/2024	KES	Review and gather documents and information for MEC for responses to Defs exhibit list objections.	1.1	
11/29/2024	KES	Review Defs demonstratives and create detailed chart describing each in connection with attorney drafting of objections to same.	3.2	
11/30/2024	GCG	Revise and send emails to class representatives re converting trial one to bench only.	0.3	
11/30/2024	GCG	Conf with and emails MEC re drafting section of pre-trial statement re bench trial.	0.3	
11/30/2024	GCG	Research and draft objections to defendants' demonstratives.	2.0	
11/30/2024	GCG	Conf with JSY and emails MJ-GW-BBK re same.	0.3	
11/30/2024	GCG	Conf with and email BJH re waiving jury trial for first trial.	0.2	
11/30/2024	GCG	Conf with JSY and emails MJ-GW-KS re communications with three class representatives re same.	0.3	
11/30/2024	GCG	Draft agenda for meet and confer with defendants.	0.2	
11/30/2024	GCG	Emails JSY-BBK re pre-trial statement and trial brief.	0.3	
11/30/2024	GCG	Review and analyze court standing order.	0.2	
11/30/2024	GCG	Emails with GW re same and re jury instructions.	0.2	
11/30/2024	JSY	Conf. w/ GCG re trial prep tasks.	0.3	
11/30/2024	JSY	Conf. w/ JA re jury waiver.	0.2	
11/30/2024	JSY	Work on pretrial filings, incl. responding to objections to designations.	2.5	
11/30/2024	BBK	Reviewing emails w/ trial team re requesting bench trial and legal research needed re implications of same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
11/30/2024	BBK	Reviewing emails w/ trial team re requesting Zoom testimony for certain witnesses, briefing disputes over jury instructions, drafting summaries of Ds' demonstratives for objections to same.	0.2	
11/30/2024	BBK	Analyzing GCG draft agenda for 12/2 meet and confer and JSY proposed addition to same; proposing further additions.	0.2	
11/30/2024	BBK	Reviewing/responding to GCG questions re status of pretrial tasks and standing order requirements.	0.1	
11/30/2024	BBK	Reviewing G. Wallace draft proposed voir dire.	0.1	
11/30/2024	BBK	Emailing w/ GCG and JSY re 12/6 trial prep meeting.	0.1	
11/30/2024	BBK	Reviewing/commenting on BM draft Opp to MIL seeking to exclude evidence relating to FSP.	0.3	
11/30/2024	BBK	Reviewing/responding to GCG queries re objecting to demonstratives that include photos of rooms not inspected by Pls; conducting fact research to answer same.	0.4	
11/30/2024	BBK	Reviewing/commenting/revising GCG draft objections to demonstratives.	0.5	
11/30/2024	BBK	Drafting trial brief.	2.5	
11/30/2024	MEC	Call with GCG re drafting portion of pretrial statement.	0.1	
11/30/2024	MEC	Follow up call with GCG.	0.1	
11/30/2024	MEC	Additional research and drafting of portion of pretrial statement.	3.4	
12/1/2024	GCG	Research and draft objections to defendants' demonstratives.	3.0	
12/1/2024	GCG	Confs with JSY, BBK and BM and emails BBK-team re same.	1.0	
12/1/2024	GCG	Conf with, texts and emails JSY re responses to defendants' objections to our exhibits.	0.4	
12/1/2024	GCG	Research and revise sections of joint statement addressing bench trial and Zoom testimony.	1.0	
12/1/2024	GCG	Confs with and emails JSY-MEC re same.	0.3	
12/1/2024	GCG	Review and analyze Pacific Steel transcript for use at our pre-trial conference.	0.3	
12/1/2024	GCG	Draft agenda for meet and confer with defendants re pre-trial issues.	0.3	
12/1/2024	GCG	Emails ER-GW-team re same.	0.3	
12/1/2024	GCG	Review and analyze draft jury instructions.	0.5	
12/1/2024	JSY	Meeting re exhibit objection responses.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/1/2024	JSY	Two conf. w/ GCG re pretrial filings.	0.5	
12/1/2024	JSY	Conf. w/ BM and KS re exhibit objections.	0.3	
12/1/2024	JSY	Conf. w/ KES re RFA responses.	0.1	
12/1/2024	JSY	Work on pretrial filings, incl. responding to exhibit objections; multiple emails re same.	8.6	
12/1/2024	JSY	Conf. w/ GCG and BM re demonstratives.	0.6	
12/1/2024	BBK	Emailing w/ trial team re proposed meet and confer agenda for 12/2 M&C; additions to draft joint pretrial statement, and responding to Ds' objections to exhibits and discovery designations; analyzing drafts of same.	0.4	
12/1/2024	BBK	Phone call w/ GCG re objections to Ds' demonstratives.	0.2	
12/1/2024	BBK	Reviewing/responding to GCG queries for objections to Ds' demonstratives; conducting fact research for same.	1.0	
12/1/2024	BBK	Analyzing Pls' draft joint pretrial statement for tone.	0.4	
12/1/2024	BBK	Emailing w/ RBGG team re Ds' additions to and comments on draft pretrial statement and offer to postpone 12/2 meet and confer.	0.2	
12/1/2024	BBK	Reviewing/revising BM revised draft Opp to MIL seeking to exclude FSP evidence; emailing w/ RBGG team re same.	0.4	
12/1/2024	BBK	Drafting trial brief.	4.1	
12/1/2024	BM	Draft responses to objections made by Defendants to Plaintiffs' proposed exhibit list in connection with pretrial filings required by the Court.	4.0	
12/1/2024	BM	Draft responses to objections made by Defendants to Plaintiffs' proposed deposition testimony designations in connection with pretrial filings required by the Court.	2.1	
12/1/2024	BM	Revise Plaintiffs' Opposition to Defendants' Motion in Limine No. 3 regarding statewide enforcement and implementation of the Fleet Safety Policy in response to feedback from JSY and BBK.	1.0	
12/1/2024	BM	Draft objections from Plaintiffs to Defendants' proposed trial demonstratives.	3.4	
12/1/2024	BM	Meeting with JSY, MEC, R. Steyer, and T. Close regarding Plaintiffs' responses to Defendants' objections to Plaintiffs' proposed exhibit list in connection with pretrial filings required by the Court.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/1/2024	BM	Meeting with JSY and KES to discuss review of Defendants' responses to Plaintiffs' Requests for Admission in connection with Plaintiffs' responses to Defendants' objections to Plaintiffs' proposed exhibit list.	0.3	
12/1/2024	BM	Meeting with GCG and JSY to discuss Plaintiffs' objections to Defendants' proposed trial demonstratives in connection with pretrial filings required by the Court.	0.6	
12/1/2024	MEC	Exhibit objection assignment check in meeting.	0.4	
12/1/2024	MEC	Drafted jury splitting section for joint pre trial statement.	1.4	
12/1/2024	MEC	Call with GCG re: draft jury splitting section.	0.1	
12/1/2024	MEC	Call with GCG re remote testimony research.	0.1	
12/1/2024	MEC	Drafted and researched remote testimony joint trial brief section.	5.6	
12/1/2024	KES	Create chart, review and compare Pltf trial exhibit list with documents authenticated by Brookdale in response to RFAs to confirm authenticated docs.	3.5	
12/2/2024	GCG	Review and revise joint pre-trial statement.	1.1	
12/2/2024	GCG	Prepare for and conduct pre-trial meet and confer with defendants' counsel.	1.2	
12/2/2024	GCG	Meet with defendants' counsel re jury instructions.	1.1	
12/2/2024	GCG	Review and analyze same.	0.5	
12/2/2024	GCG	Research and revise trial brief.	2.4	
12/2/2024	GCG	Confs with JSY and BBK re trial brief, joint statement and neutral statement.	1.0	
12/2/2024	GCG	Revise demonstratives objections.	0.9	
12/2/2024	GCG	Serve objection on defendants.	0.2	
12/2/2024	GCG	Emails with GW re jury instruction revisions.	0.1	
12/2/2024	GCG	Emails with BU and KES re MIL oppositions.	0.2	
12/2/2024	GCG	Confs with JSY re pre-trial statement status and tasks.	0.7	
12/2/2024	GCG	Emails GW-team re issues with our demonstratives and responding to defendants' objections.	0.3	
12/2/2024	JSY	Meet and confer.	1.1	
12/2/2024	JSY	Conf. w/ BBK and GCG re pretrial statement.	0.2	
12/2/2024	JSY	Multiple conf. re pretrial filings.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/2/2024	JSY	Work on pretrial filings, incl. exhibit objection responses; emails re same.	8.0	
12/2/2024	JSY	Meet and confer re jury instructions.	1.5	
12/2/2024	MWB	Conference with GCG re jury trial issue.	0.2	
12/2/2024	BBK	Conferring w/ GCG and G. Wallace re Ds' draft joint neutral statement of the case.	0.1	
12/2/2024	BBK	Conferring w/ RBGG team re preparing inserts for revised draft joint pretrial statement re: remote testimony and trying first trial to the Court rather than jury, objections to demonstratives and responses to Ds' objections to same, and responses to Ds' objections to exhibits.	0.3	
12/2/2024	BBK	Meeting and conferring w/ Ds re joint pretrial statement and other pretrial filings due 12/3.	1.1	
12/2/2024	BBK	Emailing w/ opposing counsel post-meet and confer re negotiations over pretrial filings.	0.2	
12/2/2024	BBK	Conferring w/ BM re updating list of pending motions for joint pretrial statement.	0.2	
12/2/2024	BBK	Phone call w/ GCGC re identifying additional information for inclusion in trial brief.	0.2	
12/2/2024	BBK	Drafting inserts for trial brief.	0.5	
12/2/2024	BBK	Analyzing Ds' proposed revisions/additions/comments on draft joint pretrial statement; drafting revisions and comments IRT same.	5.2	
12/2/2024	BBK	Emailing w/ co-counsel re revisions to joint pretrial statement.	0.2	
12/2/2024	BBK	Emailing w/ trial team and opposing counsel re stipulation for EOT to file jury instructions, voire dire questions, and verdict forms.	0.2	
12/2/2024	BBK	Emailing w/ trial team re JSY revisions to joint neutral statement of case; reviewing same.	0.2	
12/2/2024	BBK	Analyzing GW and MJ comments/revisions to BBK revised draft joint pretrial statement and incorporating same into draft to share w/ Ds.	2.0	
12/2/2024	BBK	Emailing Ds re revised draft joint pretrial statement.	0.1	
12/2/2024	BBK	Reviewing/commenting on GCG revised trial brief; emailing w/ team re same.	0.3	
12/2/2024	AHS	Emails re drafts circulated internally and with co-counsel and opposing counsel.	2.8	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/2/2024	BM	Draft sample responses to objections from Defendants to Plaintiffs' demonstratives for JSY review and approval, in connection with pretrial filings.	1.2	
12/2/2024	BM	Draft responses to objections from Defendants to Plaintiffs' demonstratives in connection with pretrial filings.	2.3	
12/2/2024	BM	Revise Plaintiffs' responses to Defendants' objections to Plaintiffs' proposed exhibit list with stipulation that documents produced in discovery by Defendants are authentic.	0.8	
12/2/2024	BM	Revise Plaintiffs' responses to Defendants' objections to Plaintiffs' proposed exhibit list.	0.8	
12/2/2024	BM	Draft list of all pending motions in limine for Joint Pretrial Statement in connection with pretrial filings.	0.6	
12/2/2024	BM	Draft email to trial team circulating draft Plaintiffs' Opposition to Defendants' Motion in Limine regarding Fleet Safety Policy enforcement and implementation.	0.1	
12/2/2024	BM	Revise Plaintiffs' Opposition to Defendants' Motion in Limine regarding Fleet Safety Policy enforcement and implementation based on R. Steyer and T. Close feedback.	0.2	
12/2/2024	BM	Proofread and conduct legal cite check of Plaintiffs' Opposition to Defendants' Motion in Limine regarding Fleet Safety Policy enforcement and implementation.	0.6	
12/2/2024	MEC	Email to Rachel Steyer re: remote testimony witnesses.	0.1	
12/2/2024	MEC	Edited remote testimony joint statement insert.	1.2	
12/2/2024	MEC	Incorporated JSY edits into draft remote testimony section.	0.2	
12/2/2024	MEC	Circulated draft remote testimony request to cocounsel for review.	0.1	
12/2/2024	MEC	Reviewed and incorporated edit to remote testimony joint pretrial section.	0.1	
12/2/2024	MEC	Legal research re irreparable harm on unruh injunctive relief.	0.5	
12/2/2024	MEC	Completed responses to defendants' objections to pls demonstratives.	2.0	
12/2/2024	MEC	Call with JSY re demonstrative objection responses.	0.1	
12/2/2024	MEC	Inserted explanatory parenthetical to trial brief.	0.4	
12/2/2024	KES	Continue review and comparison of exhibits and RFAs re authenticity.	3.7	
12/2/2024	KES	Download and circulate pleading.	0.1	
12/2/2024	KES	Begin prepping binder materials for courtesy copies.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/2/2024	KES	Review rules and standing orders re chambers copies of revised pretrial filings.	0.3	
12/2/2024	DLE	Compare RFA responses to exhibit list and mark documents that are authenticated; circulate findings to team.	1.5	
12/3/2024	GCG	Multiple Zooms with GW-team re applicable standards and defendants' positions taken in joint statement.	2.6	
12/3/2024	GCG	Review and revise joint statement.	1.5	
12/3/2024	GCG	Review and revise neutral statement.	0.5	
12/3/2024	GCG	Confs with and emails JSY re revisions to same.	0.5	
12/3/2024	GCG	Meet and confer with defendants re verdict form, jury instructions, trial time estimates, and joint pre-trial statement.	1.3	
12/3/2024	GCG	Emails ER-GW-team re plaintiffs' position on jury v. bench trial and other issues raised by joint statement.	0.8	
12/3/2024	GCG	Revise and oversee e-filing of plaintiffs' oppositions to MILs.	0.7	
12/3/2024	GCG	Conf with and emails KES-BU re same.	0.2	
12/3/2024	GCG	Conf with and emails MEC re motion for bench trial and legal research for same.	0.3	
12/3/2024	GCG	Conf with and emails BBK re revisions to trial brief.	0.4	
12/3/2024	GCG	Emails GW re same.	0.1	
12/3/2024	GCG	Oversee e-filing of trial brief.	0.2	
12/3/2024	GCG	Emails ER-team re joint jury instruction document.	0.5	
12/3/2024	GCG	Confs with and emails BM re same.	0.3	
12/3/2024	JSY	Work on pretrial filings; multiple conf. and emails re same.	11.7	
12/3/2024	JSY	Meet and confer with Defs re pretrial filings.	1.0	
12/3/2024	BBK	Reviewing emails w/ opposing counsel re owner/operator issue; conferring w/ trial team re same.	0.3	
12/3/2024	BBK	Phone call w/ GCG re revising trial brief.	0.1	
12/3/2024	BBK	Emails w/ trial team re objections to jury instructions & disputes over Pls' proposal re bench trial for injunctive relief claims.	0.3	
12/3/2024	BBK	Conferring w/ JSY re Pls' counter-revisions to joint neutral statement of the case and responding to Ds' counter-revisions of joint pretrial statement.	0.3	
12/3/2024	BBK	Revising trial brief (including fact research for same).	3.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/3/2024	BBK	Emails w/ trial team re disputes w/ Ds over joint neutral statement of the case and joint pretrial statement, objections/responses to parties' demonstratives, and responses to parties' objections to exhibits and discovery designations.	0.5	
12/3/2024	BBK	Conferring w/ JSY and GCG re trial brief and joint neutral statement of the case.	0.1	
12/3/2024	BBK	Reviewing/commenting/revising GW draft objections to Ds' jury instruction on mootness.	0.7	
12/3/2024	BBK	Legal and fact cite-check for trial brief.	0.7	
12/3/2024	BBK	Conferring w/ RBGG team re further revisions to trial brief.	0.3	
12/3/2024	BBK	Making final revisions to trial brief.	0.2	
12/3/2024	BBK	Conferring w/ team re finalizing/filing trial brief.	0.1	
12/3/2024	BBK	Reviewing Pls' Oppositions to Ds' MILs seeking to exclude demand letters and seeking to exclude allegedly untimely expert disclosures.	0.2	
12/3/2024	BBK	Reviewing Ds' Oppositions to Pls' 5 MILs.	0.4	
12/3/2024	AHS	Reviewed emails from co-counsel and opposing counsel re jury trail issue.	0.3	
12/3/2024	AHS	Discussed status of tasks and legal research with MEC.	0.1	
12/3/2024	AHS	Read draft joint pre-trial statement.	0.2	
12/3/2024	AHS	Discussed legal issue regarding jury trial with MEC.	0.3	
12/3/2024	AHS	Communicated with JY and BM re jury instructions and verdict forms.	0.3	
12/3/2024	AHS	Edited proposed verdict form.	1.0	
12/3/2024	AHS	Met with GCG and word processing to update draft jury verdict form.	0.2	
12/3/2024	AHS	Met with JY to discuss paragraph of trial brief re access barriers.	0.2	
12/3/2024	AHS	Edited paragraph of trial brief re access barriers.	0.4	
12/3/2024	BM	Conduct final review of Plaintiffs' Opposition to Defendants' Motion in Limine regarding Fleet Safety Policy enforcement and implementation.	0.6	
12/3/2024	BM	Circulate exemplar verdict form filings from Pacific Steel Group v. Commercial Metals Company, 20-cv-07683-HSG, to team for review.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/3/2024	BM	Draft joint proposed jury instructions document by combining Plaintiffs and Defendants proposed instructions and organizing instructions by subject matter.	6.7	
12/3/2024	BM	Telephone call with GCG to discuss drafting of joint proposed jury instructions document.	0.3	
12/3/2024	BM	Telephone call with GCG to discuss drafting of joint proposed jury instructions document.	0.1	
12/3/2024	MEC	Conf. w/ AHS re research on jury trial.	0.3	
12/3/2024	MEC	Check in conversation with GCG re jury trial question.	0.2	
12/3/2024	MEC	Conversation re jury trial with GCG.	0.2	
12/3/2024	MEC	Research re availability of bench/jury trial.	3.0	
12/3/2024	MEC	Meeting with JSY GCG GW MJ re various issues and jury trial request.	0.5	
12/3/2024	MEC	Meeting w GCG re motion for bench trial.	0.3	
12/3/2024	MEC	Began review of information and drafting motion re splitting trial bw jury and bench.	1.6	
12/3/2024	MEC	Quick review of case law re jury trial.	0.3	
12/3/2024	KES	Review, finalize and efile oppositions to motions in limine; download and organize same.	1.4	
12/3/2024	KES	Draft instructions to discover vendor re courtesy copies of pre-trial filings and prepare additional materials re same.	0.8	
12/3/2024	KES	Download and circulate Defs oppositions to MILS.	0.9	
12/3/2024	KES	Efile trial brief and confer team re same; download and organize same.	0.4	
12/3/2024	KES	Download and review Defs' amended demonstratives and email team re changes from prior version.	0.9	
12/3/2024	KES	Begin preparation of hard copy filings for courtesy binders.	1.4	
12/3/2024	KES	Review, revise and format updated exhibit list.	1.8	
12/3/2024	KES	Email with B. Umpierre re Mastin transcript for MIL.	0.3	
12/3/2024	KES	Confer and email with team re pre-trial filings.	0.5	
12/3/2024	DLE	Save and circulate filed pleadings; update deadlines on team calendar re same.	0.3	
12/4/2024	GCG	Research and revise draft jury instructions and one pagers.	2.9	
12/4/2024	GCG	Conduct Zoom meeting with GW, MJ, AS and BM re same.	0.6	
12/4/2024	GCG	Draft team to do list related to next set of filings.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2024	GCG	Meet with RBGG team to discuss jury instructions, courtesy copies, trial time statement and other pleadings due to be filed.	0.5	
12/4/2024	GCG	Emails ER and JB re voir dire verdict form and jury instructions.	0.3	
12/4/2024	GCG	Review and revise voir dire questions.	1.0	
12/4/2024	GCG	Emails GW-team re same.	0.2	
12/4/2024	GCG	Emails GW-MJ-JSY-team re one-page responses to disputed instructions.	0.5	
12/4/2024	GCG	Conf with KS re trial time estimate pleading research and prospects for settlement.	0.3	
12/4/2024	GCG	Revise joint statement re trial time.	0.4	
12/4/2024	JSY	Emails re pretrial filings.	0.2	
12/4/2024	JSY	Multiple conf. w/ GCG re status of jury instructions and other pretrial filings.	0.5	
12/4/2024	JSY	Conf. w/ BBK re team meeting.	0.1	
12/4/2024	JSY	Work on jury instruction one pagers; emails re same.	2.3	
12/4/2024	JSY	Work on trial time estimates and research for filing re trial time; emails re same.	2.0	
12/4/2024	JSY	Emails re settlement conference.	0.2	
12/4/2024	BBK	Reviewing Pls' revised draft special jury instructions on mootness, direct threat, and place of public accommodation definition.	0.2	
12/4/2024	BBK	Conferring w/ RBGG team re immediate tasks for this week.	0.2	
12/4/2024	BBK	Emailing w/ RBGG team re case law that supports injunctive relief in Title III claim and analysis re same.	0.2	
12/4/2024	BBK	RBGG team meeting re immediate case tasks for 12/4 - 12/6.	0.4	
12/4/2024	BBK	Emailing w/ plaintiffs' disability attorney re examples of lengthy trials of disability rights claims for joint statement re trial time estimates.	0.2	
12/4/2024	BBK	Emailing w/ DLE re identifying key case law for GCG to prep for pretrial conference.	0.1	
12/4/2024	BBK	Conferring w/ trial team re next round of revisions to joint proposed voir dire questions; reviewing same.	0.2	
12/4/2024	BBK	Conferring w/ JSY re reducing trial time estimate & reviewing JSY proposal to co-counsel re same.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2024	BBK	Reviewing/responding to MEC query re issues to be decided at all three phases of trial.	0.2	
12/4/2024	BBK	Reviewing/revising one-page Pls' statements re disputed jury instructions.	1.2	
12/4/2024	BBK	Conferring w/ JSY re identifying comparable cases w/ lengthy trials for joint statement on revised trial time estimate.	0.2	
12/4/2024	BBK	Emailing w/ trial team re briefing of disputes over jury instructions.	0.6	
12/4/2024	BBK	Conferring w/ trial team re proposed agenda for 12/5 meet and confer w/ Ds.	0.1	
12/4/2024	BBK	Conducting legal research for Pls' statement re dispute over jury instructions on mootness; conferring w/ GW, T. Close, and RBGG team re same.	0.8	
12/4/2024	BBK	Researching/drafting joint statement IDing relevant comparable cases for revised trial time estimate.	4.6	
12/4/2024	AHS	Call with GCG re: jury instructions.	0.2	
12/4/2024	AHS	Call with BM re jury instructions.	0.1	
12/4/2024	AHS	Met with GCG JY BM BBK MEC DLE to discuss upcoming pretrial tasks.	0.6	
12/4/2024	AHS	Reviewed emails re pretrial filings and filed pretrial brief.	0.4	
12/4/2024	AHS	Updated internal case tasks list and case calendar.	1.2	
12/4/2024	AHS	Revised jury instruction document focusing on special instructions.	0.8	
12/4/2024	AHS	Edited one-page arguments in support of plfs' version of disputed instructions on public accommodations, standing, due process.	2.5	
12/4/2024	AHS	Met with GCG BM and co-counsel to discuss jury instructions, voir dire, special verdict form.	0.4	
12/4/2024	AHS	Incorporated plaintiffs' statement ISO jury instructions to master document.	0.5	
12/4/2024	AHS	Emailed with co-counsel re jury instructions.	0.3	
12/4/2024	AHS	Emailed and discussed jury instructions with team.	0.3	
12/4/2024	BM	Meeting with GCG, JSY, BBK, and AHS to discuss pretrial filing tasks.	0.5	
12/4/2024	BM	Revise joint proposed jury instructions document to add new and revised jury instructions.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2024	BM	Revise joint proposed jury instructions document to change instructions from disputed to stipulated as necessary, and make other necessary formatting changes.	1.4	
12/4/2024	BM	Review and make proposed edits to Plaintiffs' one-page argument regarding proposed direct threat jury instructions.	0.8	
12/4/2024	BM	Review and make proposed edits to Plaintiffs' one-page argument regarding proposed mootness jury instructions.	0.9	
12/4/2024	BM	Review and make proposed edits to Plaintiffs' one-page argument regarding proposed Fleet Safety Policy transfer requirement jury instructions.	0.7	
12/4/2024	BM	Telephone call with GCG to discuss status of joint proposed jury instructions document and Plaintiffs' one-page arguments in support of disputed jury instructions.	0.1	
12/4/2024	BM	Review joint proposed jury instructions document to determine number of disputed jury instructions and send email summarizing status to team.	0.3	
12/4/2024	BM	Draft email to GCG and team summarizing edits to joint proposed jury instructions document.	0.2	
12/4/2024	BM	Revised joint proposed jury instruction document to insert additional one-page arguments from Plaintiffs.	0.7	
12/4/2024	BM	Review legal research in connection with Fleet Safety Policy mootness issue to find case law in support of proposition that mootness is a question of law.	0.3	
12/4/2024	BM	Compile Plaintiffs' and Defendants' proposed jury instructions document.	0.2	
12/4/2024	BM	Telephone call with GCG to discuss status of joint proposed jury instructions document.	0.1	
12/4/2024	BM	Telephone call with AHS to discuss revisions of joint proposed jury instructions document.	0.2	
12/4/2024	BM	Review joint proposed jury instructions document.	0.2	
12/4/2024	BM	Conf. re joint proposed jury instructions document.	0.1	
12/4/2024	BM	Conduct legal research in connection with review of Plaintiffs' one-page argument regarding proposed mootness jury instructions.	0.3	
12/4/2024	MEC	Team check in meeting re next steps and assignments.	0.5	
12/4/2024	MEC	Drafting motion re: bench trial demand.	7.4	
12/4/2024	KES	Confer DLE re preparation of materials for hard copy binders, including formatting issues for hard copy exhibit index.	0.7	
12/4/2024	KES	Calendar settlement conference related deadlines.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/4/2024	DLE	Attend and note-take internal check in about status of pre-trial tasks.	0.5	
12/4/2024	DLE	Finalize and circulate notes from internal check-in re status of pretrial tasks.	0.3	
12/4/2024	DLE	Confer with representative from litigation service re logistics for courtesy binders.	0.4	
12/4/2024	DLE	Save and circulate jury instruction drafts per BM.	0.2	
12/4/2024	DLE	Save and circulate exemplar trials for trial time estimate per BBK.	0.2	
12/4/2024	DLE	Save and circulate filed pleadings.	0.3	
12/4/2024	DLE	Confer with KES re questions about preparing courtesy copy binders for the court.	0.5	
12/4/2024	DLE	Prepare pre-trial courtesy copy binders for the court.	2.6	
12/5/2024	GCG	Review and revise draft jury instructions.	0.5	
12/5/2024	GCG	Meet and confer with defendants re same.	1.1	
12/5/2024	GCG	Zoom meetings with RBGG and co-counsel teams to discuss one page arguments re jury instructions.	2.0	
12/5/2024	GCG	Draft one pagers.	1.5	
12/5/2024	GCG	Confs with and emails JSY and KES re finalizing jury instructions and one pagers.	2.5	
12/5/2024	GCG	Revise and oversee e-filing of plaintiffs' verdict form and one page response.	0.5	
12/5/2024	GCG	Revise voir dire questions.	0.5	
12/5/2024	GCG	Email ER re same.	0.2	
12/5/2024	GCG	Oversee e-filing of voir dire questions.	0.2	
12/5/2024	GCG	Review and revise courtesy binders for delivery to court.	0.5	
12/5/2024	GCG	Research and revise joint supplemental statement re trial time.	0.7	
12/5/2024	GCG	Emails co-counsel re same.	0.2	
12/5/2024	GCG	Conf with MEC re research for motion for bench trial.	0.2	
12/5/2024	GCG	Conf with JSY re same.	0.2	
12/5/2024	JSY	Meet and confer re jury instructions.	0.7	
12/5/2024	JSY	Work on pretrial filings and jury instructions; multiple conf. and emails re same.	10.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1123

SERVICES

Date	Person	Description of Services	Hours	Discount
12/5/2024	BBK	Reviewing emails w/ opposing counsel re disputes over voir dire questions & jury instructions and re: exchange of updated trial estimates.	0.2	
12/5/2024	BBK	Conferring w/ JSY re comparable cases for 12/6 filing re trial time estimates.	0.2	
12/5/2024	BBK	Researching/drafting write-ups of comparable cases for joint filing re trial time estimates.	1.8	
12/5/2024	BBK	Meeting w/ JSY, AHS, and BM re writing Pls' statements for disputed jury instructions and write-ups of comparable cases for 12/6 filing.	0.6	
12/5/2024	BBK	Reviewing/commenting to RBGG team re: Order directing parties to comply w/ standing order.	0.1	
12/5/2024	BBK	Conferring w/ RBGG team re preparing binders for service on Judge Gilliam on 12/6 per Standing Order.	0.1	
12/5/2024	BBK	Meeting w/ trial team re plan for drafting Pls' statements for all disputed jury instructions.	0.3	
12/5/2024	BBK	Reviewing emails w/ Ds re stipulating to proposed 1-week continuance of trial due to health issues of Defense counsel.	0.1	
12/5/2024	BBK	Researching/drafting write-ups of Pls' statements re disputed jury instructions relating to equivalent facilitation defense.	2.1	
12/5/2024	BBK	Drafting arguments for GCG for two write-ups of Pls' statements re disputed jury instructions relating to Ds' argument re: no liability for subsequent owners of facilities under ADA; conferring w/ GCG re same.	0.4	
12/5/2024	BBK	Conferring w/ RBGG team re write-ups and analysis re comparable cases for 12/6 filing re trial time estimates.	0.3	
12/5/2024	BBK	Emails w/ trial team re writeups of Pls' statements re jury instruction objections; reviewing emails w/ co-counsel and opposing counsel re: finalizing/filing jury instructions.	0.8	
12/5/2024	BBK	Reviewing/commenting on updated joint statement re trial time estimates; reviewing GW comments on same.	0.1	
12/5/2024	BBK	Revising joint statement re trial time estimates; conferring w/ GCG re same.	0.4	
12/5/2024	AHS	Attended meet and confer with opposing counsel.	1.0	
12/5/2024	AHS	Met with GCG JY BM and co-counsel to discuss jury instructions, voir dire, verdict forms, trial time filing.	0.6	
12/5/2024	AHS	Call with BM re jury instructions assignment.	0.2	
12/5/2024	AHS	Emailed with team re jury instruction on equivalent facilitation.	0.3	
12/5/2024	AHS	Met with JY BM BBK to discuss trial time filing.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/5/2024	AHS	Edited supplemental statement re trial time.	2.8	
12/5/2024	AHS	Met with GCG JY BBK BM and cocounsel to discuss next version of jury instructions.	0.3	
12/5/2024	AHS	Attended meeting with GCG BM and co-counsel re jury instructions and statements in support.	0.4	
12/5/2024	AHS	Audited jury instruction document to ensure all disputed instructions were accounted for with statement in support.	0.5	
12/5/2024	AHS	Reviewed e-mails re: jury instructions and 12/5 filings.	0.4	
12/5/2024	BM	Enter time billing entries into Orion for week of December 1 to December 8, 2024.	0.3	
12/5/2024	BM	Attend meet and confer with Defendants to discuss proposed jury instructions, verdict forms, and voir dire questions.	1.0	
12/5/2024	BM	Meeting with co-counsel and RBGG to discuss assignments related to preparing and filing joint proposed jury instructions.	0.5	
12/5/2024	BM	Meeting with co-counsel and RBGG to discuss assignments related to preparing and filing joint proposed jury instructions.	0.3	
12/5/2024	BM	Meeting with JSY, BBK, and AHS to discuss proposed jury instructions and joint supplemental statement regarding trial time estimates.	0.5	
12/5/2024	BM	Telephone call with AHS to discuss drafting of proposed jury instructions.	0.3	
12/5/2024	BM	Review joint proposed jury instructions document to determine if revisions to list of missing one-page documents needs to be revised.	0.4	
12/5/2024	BM	Conduct legal research in connection with drafting joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length.	2.9	
12/5/2024	BM	Draft case summaries for joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length.	1.1	
12/5/2024	BM	Insert final one-page argument regarding proposed jury instructions on prohibition on discrimination into joint proposed jury instructions argument.	0.2	
12/5/2024	BM	Create excerpt of proposed jury instruction and Defendants' one-page argument regarding application of Title 24 of the California Building Code to new construction for GCG review.	0.1	
12/5/2024	BM	Revise joint proposed jury instruction document to complete numbering of jury instructions.	0.3	
12/5/2024	BM	Review joint proposed jury instructions document.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/5/2024	BM	Email to BBK regarding question about case for joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length.	0.1	
12/5/2024	BM	Telephone call with JSY to discuss revisions to joint proposed jury instructions document.	0.1	
12/5/2024	BM	Telephone call with JSY to discuss revisions to joint proposed jury instructions document.	0.1	
12/5/2024	BM	Telephone call with GCG to discuss draft of joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length.	0.1	
12/5/2024	MEC	Conf. with GCG re status of bench trial motion.	0.2	
12/5/2024	MEC	Drafting bench trial motion.	7.3	
12/5/2024	KES	Emails with discovery vendor and messenger service re preparation and delivery of pretrial courtesy binders to court.	0.4	
12/5/2024	KES	Circulate court notice and update calendar re same.	0.1	
12/5/2024	KES	Follow up emails wtih court reporter service re depo video sync files.	0.2	
12/5/2024	KES	Assist with preparation of courtesy binders and update index; confer DLE re same.	2.3	
12/5/2024	KES	Review order, confer team re same.	0.2	
12/5/2024	KES	Email with MEC re issue in connection with pretrial filing.	0.2	
12/5/2024	KES	Efile joint voire dire; assist with finalization of same; download and print filed version for courtesy.	0.7	
12/5/2024	KES	Review, finalize and efile proposed jury instructions; confer JY re same; download and print courtesy copy of same.	1.0	
12/5/2024	KES	Finalize and efile special verdict form; download and print for courtesy binder.	0.6	
12/5/2024	KES	Email court with Word versions of pre-trial filings; confer JY re same.	0.4	
12/5/2024	KES	Experiment with Sanction in preparation for trial.	0.6	
12/5/2024	DLE	Save and circulate filed pleading.	0.1	
12/5/2024	DLE	Prepare pre-trial binders for the court with KES.	1.7	
12/6/2024	GCG	Revise defendants' stipulation to move trial.	0.2	
12/6/2024	GCG	Confs with JSY and KES re pretrial binders.	0.2	
12/6/2024	GCG	Emails ER-JSY re trial time estimate and joint statement due today.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2024	GCG	Conf with JSY re cross and direct times.	0.1	
12/6/2024	GCG	Emails from GW re trial time estimate.	0.1	
12/6/2024	GCG	Revise list of key cases for trial.	0.2	
12/6/2024	GCG	Email BBK re same.	0.1	
12/6/2024	GCG	Review and revise joint statement re trial time.	0.5	
12/6/2024	GCG	Confs with JSY and emails ER-BBK-GW-team re revisions to trial time statement.	0.5	
12/6/2024	GCG	Meet with co-counseling team to plan mock trial, prepare for settlement conference and discuss jury waiver.	0.6	
12/6/2024	GCG	Conf with and emails JSY and MEC re same.	0.3	
12/6/2024	JSY	Work on trial time estimate filing; multiple emails and conf. re same.	3.0	
12/6/2024	JSY	Work on binders of chambers copies and pretrial filings; conf. re same.	0.4	
12/6/2024	JSY	Revise stip re trial delay; emails re same.	0.2	
12/6/2024	JSY	Team meeting.	0.5	
12/6/2024	JSY	Emails re bench trial motion.	0.5	
12/6/2024	BBK	Reviewing emails w/ opposing counsel re trial time estimates and joint filing re same.	0.3	
12/6/2024	BBK	Emailing w/ trial team re revised trial time estimates.	0.2	
12/6/2024	BBK	Identifying key cases for GCG to prep for pretrial conference/mock trial.	1.0	
12/6/2024	BBK	Reviewing/revising DLE draft TOC for binder of key cases for GCG w/ summaries of same.	0.2	
12/6/2024	BBK	Emailing w/ GCG and DLE re binder of key cases for mock trial and pretrial conference prep.	0.1	
12/6/2024	BBK	Reviewing/commenting on Ds' proposed revisions to joint filing re trial time estimate and comparable cases.	0.2	
12/6/2024	BBK	Researching Ds' proposed comparable case re: access barriers at Louisiana prison.	0.5	
12/6/2024	BBK	Reviewing Ds' revised section of joint filing; revising Pls' section accordingly.	1.0	
12/6/2024	BBK	Emails w/ trial team & opposing counsel re revising/finalizing/filing joint filing re trial time estimates and comparable cases.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2024	BBK	Reviewing MEC legal research and recommendation re: potential motion for bench trial.	0.1	
12/6/2024	BBK	Meeting w/ trial team re case.	0.6	
12/6/2024	AHS	(Billing Judgment) Conf. re upcoming tasks with DLE.	0.0	0.5
12/6/2024	AHS	Reviewed e-mails re: jury instructions and 12/5 filings.	0.3	
12/6/2024	AHS	Attended meeting with GCG JY BBK BM MEC and co-counsel re upcoming pretrial deadlines.	0.6	
12/6/2024	BM	Attend meeting with co-counsel and RBGG to discuss case status and other pending action items.	0.5	
12/6/2024	BM	Review case law cited by Defendants in draft joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length.	1.1	
12/6/2024	BM	Conduct additional review of case law cited by Defendants in draft joint supplemental statement regarding trial time estimates and comparable cases in terms of trial length based on BBK feedback.	0.2	
12/6/2024	MEC	Additional research re jury/bench trial and summarizing thoughts for GCG and JSY.	2.9	
12/6/2024	MEC	Team meeting.	0.5	
12/6/2024	MEC	Follow up meeting with GCG re next steps for bench trial.	0.2	
12/6/2024	MEC	Condensed thoughts re bifurcation and jury trial and sent to GCG and JSY.	1.0	
12/6/2024	MEC	Sent email summarizing thoughts re bench trial to team.	0.1	
12/6/2024	KES	Finalize pretrial courtesy binders and arrange for delivery to court.	1.0	
12/6/2024	KES	Review status of depo video sync files needed for trial and determine additional video needed; confer team and co-counsel re same; email to court reporting service re same.	2.3	
12/6/2024	KES	Review and efile supplemental statement; download and circulate filed pleading.	0.4	
12/6/2024	KES	Experiment with video clips in Sanction.	0.4	
12/6/2024	DLE	Attend and note-take weekly meeting with co-counsel.	0.6	
12/6/2024	DLE	Finalize courtesy copy binders of pre-trial filings for delivery to court.	1.3	
12/6/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.3	
12/6/2024	DLE	Save and circulate filed pleadings.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/6/2024	DLE	Check math for trial time estimates using allocated time per witness; send to JSY.	0.5	
12/6/2024	DLE	Compile binder of key cases for GCG pre-trial prep.	1.8	
12/6/2024	DLE	Compile binder of named plaintiff Jestrabek-Hart depo materials, rog responses, and other designations for GCG pre-trial prep.	1.1	
12/7/2024	GCG	Review and analyze key cases to prepare for trial.	0.8	
12/7/2024	GCG	Emails GW-SC re mock trial preparation.	0.2	
12/7/2024	JSY	Emails re voir dire.	0.1	
12/8/2024	GCG	Emails with ED-GW re mock trial.	0.2	
12/8/2024	GCG	Review and analyze key cases to prepare for trial.	1.0	
12/8/2024	GCG	Email with BBK re ADAAG and CBC issues.	0.2	
12/8/2024	JSY	Emails re mock trial.	0.1	
12/9/2024	GCG	Meet by Zoom with SC to plan mock trial.	0.3	
12/9/2024	GCG	Follow up meeting with GW and MJ re same.	0.6	
12/9/2024	GCG	Conf with and emails JSY re mock trial and meeting with RBBG team to plan trial.	0.4	
12/9/2024	GCG	Emails with MEC re legal research re jury selection injunctive relief issues.	0.2	
12/9/2024	GCG	Review and analyze jury instructions and special verdict form.	1.0	
12/9/2024	GCG	Review and analyze defendants' demonstratives to prepare for mock trial.	1.0	
12/9/2024	GCG	Draft and revise outline of defendants' section of mock trial.	1.0	
12/9/2024	GCG	Email with GW re plan for pre-trial conference.	0.2	
12/9/2024	GCG	Review and analyze transcript of CMC pre-trial conference before Judge Gilliam.	0.3	
12/9/2024	GCG	Review and revise settlement statement.	0.3	
12/9/2024	GCG	Conf with Judge Spero and emails GW-team re need to cancel settlement conference.	0.2	
12/9/2024	GCG	Email with MJ-team re pre trial depos.	0.1	
12/9/2024	JSY	Conf. w/ GCG re planning for team meeting.	0.2	
12/9/2024	JSY	Conf. w/ GCG re settlement conference and mock trial prep.	0.5	
12/9/2024	JSY	Draft agenda for team meeting; emails re same.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1129

SERVICES

Date	Person	Description of Services	Hours	Discount
12/9/2024	JSY	Emails re prep for mock trial.	0.1	
12/9/2024	JSY	Emails re settlement conference process.	0.1	
12/9/2024	JSY	Emails re depositions of witnesses and RFAs.	0.2	
12/9/2024	BBK	Analyzing recent Judge Gilliam case re application of ADAAG standards to inaccessible tables; emailing w/ RBGG team re same.	0.2	
12/9/2024	BBK	Reviewing/responding to GCG queries re cases affirming permanent injunctions in Title III or Unruh Act cases; reviewing MEC findings re same.	0.4	
12/9/2024	BBK	Reviewing/responding to GCG query re responses to PRA requests.	0.1	
12/9/2024	BBK	Emailing w/ RBGG team re plan for mock trial and preparing for same.	0.2	
12/9/2024	BBK	Emailing w/ co-counsel and RBGG team re settlement conference statement; reviewing emails from MJ Spero chambers re postponing settlement conference to January.	0.1	
12/9/2024	BBK	Emailing w/ GCG re scope of tutorial on key Brookdale issues for RBGG trial team.	0.2	
12/9/2024	BBK	Reviewing MEC research re peremptory challenges to prospective jurors.	0.1	
12/9/2024	BBK	Phone call w/ GCG re trial prep.	0.5	
12/9/2024	BBK	Preparing assignment for DLE re key statutes, regulations, and guidance for trial prep.	0.2	
12/9/2024	BBK	Reviewing emails w/ co-counsel and opposing counsel re depositions of undisclosed witnesses.	0.1	
12/9/2024	BBK	Reviewing/responding to GCG re analysis of Pacific Steel pretrial conference.	0.1	
12/9/2024	BBK	Conferring w/ RBGG team re 12/10 meeting on trial prep; reviewing JSY agenda for same.	0.2	
12/9/2024	AHS	Met with GCG and MEC and jury consultant to discuss 12/14 mock trial.	0.3	
12/9/2024	AHS	Reviewed emails re mock trial and demonstratives.	0.3	
12/9/2024	AHS	Reviewed emails with co-counsel and opposing counsel.	0.3	
12/9/2024	MEC	Mock trial prep meeting.	0.4	
12/9/2024	MEC	Research on preemptory strike standard and number per side.	1.3	
12/9/2024	MEC	Research re Unruh Act and Title III injunctive relief cases.	0.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/9/2024	KES	Review and organize amended demonstratives.	0.3	
12/9/2024	KES	Download and organize recently-received video sync files for multiple depo transcripts and upload to TextMap.	1.2	
12/9/2024	KES	Multiple emails with court reporting services re video sync files for previously ordered depo transcripts.	0.7	
12/9/2024	KES	Begin upload of depo video transcripts and other materials to Sanction in connection with preparation for mock trial; test video clips for same; confer DLE re same.	4.2	
12/9/2024	DLE	Create binder for GCG with recent pleadings for upcoming pretrial conference.	0.5	
12/10/2024	GCG	Meet with JSY, KES and DE to plan defendants' presentation for mock trial.	1.0	
12/10/2024	GCG	Email with SC re same.	0.2	
12/10/2024	GCG	Emails with MJ re Feaster testimony.	0.2	
12/10/2024	GCG	Review and analyze Feaster and Bowman transcripts.	1.0	
12/10/2024	GCG	Draft and revise defendants' presentation for mock trial.	1.5	
12/10/2024	GCG	Meet with RBGG team to prepare evidence and plan trial.	1.7	
12/10/2024	GCG	Email from Judge Spero re settlement process.	0.1	
12/10/2024	JSY	Team meeting re trial prep.	1.6	
12/10/2024	JSY	Meeting re prep for mock trial; emails re same.	0.9	
12/10/2024	JSY	Prep for team meeting.	0.2	
12/10/2024	BBK	Preparing assignment for DLE to analyze/compare barriers at issue at trial listed on special verdict form w/ those included in Pls' demonstratives.	0.2	
12/10/2024	BBK	Reviewing/responding to J. Carlson inquiry re: settlement conference.	0.2	
12/10/2024	BBK	Conferring w/ DLE re preparing/organizing key statutes, regulations and regulatory guidance for GCG trial prep.	0.2	
12/10/2024	BBK	IDing key statutes, regulations and regulatory guidance for GCG trial prep.	0.7	
12/10/2024	BBK	Analyzing disputed jury instructions over specific barriers at issue in first trial and drafting memo for GCG/JSY re same.	1.0	
12/10/2024	BBK	Reviewing emails w/ co-counsel re depositions of undisclosed witnesses by both parties; reviewing emails w/ co-counsel and RBGG team re prep for mock trial.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1131

SERVICES

Date	Person	Description of Services	Hours	Discount
12/10/2024	BBK	Reviewing email from MJ Spero re settlement negotiations upon receipt of order on dispositive motions.	0.1	
12/10/2024	BBK	Meeting w/ RBGG team re trial prep and strategy.	1.6	
12/10/2024	BBK	Post-trial prep meeting emails w/ RBGG team.	0.1	
12/10/2024	AHS	Reviewed agenda for internal pre-trial tasks meeting.	0.3	
12/10/2024	AHS	Read trial brief and joint pretrial statement.	0.8	
12/10/2024	AHS	Met with GCG JY DLE KS MEC BBK BM to discuss pretrial plan.	1.6	
12/10/2024	BM	Attend trial preparation meeting with GCG, JSY, BBK, AHS, MEC, KES, and DLE.	1.6	
12/10/2024	BM	Draft email to team circulating case law from Judge Gilliam regarding declarations in support of application of the voluntary cessation exception to mootness.	0.7	
12/10/2024	MEC	Divided research on injunctive relief and jury challenges into two memos and conducted additional research on for cause challenges.	3.0	
12/10/2024	MEC	Trial prep meeting.	1.5	
12/10/2024	MEC	Circulated previous research memos to team.	0.1	
12/10/2024	MEC	Review of filings for background knowledge of case.	0.8	
12/10/2024	KES	Emails with co-counsel and with court reporting services re requests and status of video depo synch files in preparation for trial and mock trial; upload newly-received video files; review and update master depo chart.	1.5	
12/10/2024	KES	Meeting with GCG, JY and DLE re materials and other preparations for mock trial.	0.8	
12/10/2024	KES	Review and gather materials and information in connection with team preparation for mock trial.	1.3	
12/10/2024	KES	Continue work with creating and editing depo video clips and other materials in Sanction in preparation for mock trial.	2.4	
12/10/2024	KES	Zoom with co-counsel re various trial prep tasks.	1.5	
12/10/2024	DLE	Meeting with JSY, GCG, and KES to discuss preparation for mock trial presentation.	0.6	
12/10/2024	DLE	Attend trial-prep team meeting.	1.6	
12/10/2024	DLE	Meeting with GCG, JSY, KES to discuss preparation for mock trial.	0.6	
12/10/2024	DLE	Review Michael Johnson deposition testimony and code for videos needed for mock trial; send to GCG.	1.7	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/11/2024	GCG	Review and revise outline of defendant position for mock trial and demonstratives for same.	0.8	
12/11/2024	GCG	Emails GW - JSY - MJ re mock trial planning and pre-trial conference strategy.	0.3	
12/11/2024	GCG	Review legal and factual research from AS, BBK and MEC.	0.3	
12/11/2024	GCG	Confs with JSY, KES and DE re video for mock trial.	0.5	
12/11/2024	GCG	Review and analyze defense witness deposition transcripts.	0.9	
12/11/2024	GCG	Emails JSY - team re same.	0.2	
12/11/2024	GCG	Emails MJ - team re request to depose defendants' new witnesses.	0.2	
12/11/2024	GCG	Emails with named plaintiffs re postponed settlement conference.	0.2	
12/11/2024	JSY	Prep for mock trial incl. identifying depo excepts and editing outline; multiple emails and conf re same.	3.3	
12/11/2024	BBK	Reviewing/commenting on GCG's draft outline of defense case for mock jury trial.	0.2	
12/11/2024	BBK	Analyzing disputed jury instructions re: specific access barriers under ADAAG and CBC; drafting memo re same.	1.8	
12/11/2024	BBK	Reviewing emails w/ trial team re proposal for depositions of two undisclosed witnesses by each side in advance of trial.	0.1	
12/11/2024	BBK	Emailing w/ RBGG team re prep for mock trial.	0.2	
12/11/2024	BBK	Emailing w/ RBGG team re trial prep.	0.3	
12/11/2024	BBK	Emailing w/ DLE re project to match barriers listed in special verdict form w/ those in Pls' demonstratives.	0.1	
12/11/2024	BBK	Reviewing MEC memo re legal standards and procedure for peremptory challenges and challenges for cause of jurors.	0.1	
12/11/2024	AHS	Reviewed emails and outline re mock trial.	0.4	
12/11/2024	AHS	Revised expert section of outline for mock trial.	0.9	
12/11/2024	AHS	Reviewed Defs' exhibit re issue register.	0.3	
12/11/2024	AHS	Identified and circulated relevant cases and documents re trial prep.	1.0	
12/11/2024	BM	Draft memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	3.2	
12/11/2024	BM	Draft email to team circulating memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/11/2024	BM	Conduct legal research in connection with drafting memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	0.6	
12/11/2024	MEC	Reviewed issue register exhibits and provided GCG with summary of findings.	1.8	
12/11/2024	MEC	Background reading and memo creation for trial prep.	3.9	
12/11/2024	KES	Troubleshoot Sanction issues in preparation for mock trial; confer ICS, DLE and Sanction re same.	2.2	
12/11/2024	KES	Emails with court reporting service re video sync files for trial prep.	0.4	
12/11/2024	KES	Review and email team re Defs issue register exhibits.	0.7	
12/11/2024	KES	Review and create reports re depo excerpts and create video clips in connection with preparation for mock trial.	1.6	
12/11/2024	KES	Upload recently received depo video sync files to TextMap.	0.5	
12/11/2024	DLE	Review Stiner deposition testimony and code for video for mock trial; send to GCG.	1.7	
12/11/2024	DLE	Work with KES and IT department to troubleshoot trial software issues.	1.5	
12/11/2024	DLE	Compare barriers from demonstratives to those listed on verdict form by creating excel sheet; confer with BBK re same.	1.5	
12/11/2024	DLE	Review Kimia Ateian deposition testimony and defendants' designations and code testimony for videos needed for mock trial.	0.8	
12/11/2024	DLE	Pull and circulate JSY's designated Algarme testimony excerpts in preparation for mock trial.	0.2	
12/11/2024	DLE	Create demonstrative slide show for GCG use during mock trial.	0.7	
12/11/2024	DLE	Troubleshoot technical issue with demonstrative slideshow; confer with KES and ERL re same.	0.4	
12/12/2024	GCG	Research and revise mock trial defense presentation.	3.3	
12/12/2024	GCG	Practice presentation and review video and slides with JSY, KES and DE.	2.5	
12/12/2024	GCG	Emails GW-SC re plans for mock trial.	0.4	
12/12/2024	GCG	Email with GW re Judge Spero instruction to prepare detailed settlement demand.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/12/2024	GCG	Review and analyze BBK memo re dispatched just instructions re barrier standards.	0.2	
12/12/2024	GCG	Prepare outline of pre-trial conference.	0.5	
12/12/2024	GCG	Conf with and email BM re revisions to MIL list.	0.3	
12/12/2024	GCG	Confs with and emails JSY re pre-trial preparation.	0.3	
12/12/2024	JSY	Work on mock trial presentation; multiple conf. and meetings re same; multiple emails re same.	5.7	
12/12/2024	JSY	Prep for pretrial conference.	0.9	
12/12/2024	BBK	Emailing w/ RBGG team re addressing Ds' planned use of Issue Registers regarding resident complaints at trial.	0.3	
12/12/2024	BBK	Reviewing/commenting on revised draft outline of defense case for mock trial.	0.3	
12/12/2024	BBK	Reviewing BM memo re rules for service of trial subpoenas and proposed witnesses to be served.	0.2	
12/12/2024	BBK	Drafting/sending email to RBGG team re recommendations for service of trial subpoenas; emailing w/ BM re same.	0.5	
12/12/2024	BBK	Emails w/ trial team re prep/plan for mock trial.	0.2	
12/12/2024	BBK	Brainstorming deposition testimony for use at mock trial emailing GCG/JSY re same.	0.5	
12/12/2024	AHS	Reviewed joint pretrial statement.	0.5	
12/12/2024	AHS	Researched experts and statutory definitions and sent to GCG.	0.3	
12/12/2024	BM	Draft memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	1.3	
12/12/2024	BM	Revise descriptions of Plaintiffs' pending Motions in Limine and draft descriptions of Defendants' pending Motions in Limine for GCG mock trial outline.	1.9	
12/12/2024	BM	Conduct legal research in connection with drafting memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	1.7	
12/12/2024	BM	Draft email to BBK regarding service of subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	0.8	
12/12/2024	MEC	Read and responded to email from BBK re issue registers.	0.1	
12/12/2024	MEC	Read email from BM re subpoena.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/12/2024	MEC	Read through additional trial info and drafted memo re trial plan.	3.3	
12/12/2024	MEC	Reviewed draft mock trial outline.	0.5	
12/12/2024	KES	Emails with co-counsel re deposition and video in preparation for trial.	0.4	
12/12/2024	KES	Troubleshoot taking Sanction files offline; confer ICS re same.	2.0	
12/12/2024	KES	Review documents, discovery, depositions and media files and gather information for mock trial presentation; excerpt depos and upload to Sanction re same; confer team re same.	4.8	
12/12/2024	KES	Participate in mock trial presentation run throughs with GCG, DLE.	2.5	
12/12/2024	DLE	First run-through of GCG mock trial presentation with GCG, JSY, KES.	1.6	
12/12/2024	DLE	Second run-through of GCG mock trial presentation with GCG, JSY, KES.	1.3	
12/12/2024	DLE	Add deposition testimony videos to mock trial presentation.	1.2	
12/12/2024	DLE	Set up mock trial presentation for first run through.	0.2	
12/12/2024	DLE	Set up mock trial presentation for second run through.	0.2	
12/12/2024	DLE	Make edits and add testimony to mock trial presentation per GCG and JSY notes.	1.4	
12/13/2024	GCG	Review and revise defendant presentation for mock trial.	0.5	
12/13/2024	GCG	Confs with JSY, KES and DE re same.	1.0	
12/13/2024	GCG	Run through defense presentation for mock trial.	1.2	
12/13/2024	GCG	Review and analyze court order re summary judgment.	0.9	
12/13/2024	GCG	Zoom with co-counsel, conf with JSY and MWB and emails partners re same.	0.8	
12/13/2024	GCG	Emails SC-GW re preparation for mock trial.	0.5	
12/13/2024	GCG	Email with BM re subpoena issues.	0.1	
12/13/2024	GCG	Conf with JSY re follow up to summary judgment decision.	0.3	
12/13/2024	GCG	Texts with KES and DE re mock trial demonstratives and after hours glitches.	0.3	
12/13/2024	JSY	Team meeting re SJ order.	0.5	
12/13/2024	JSY	Review and analyze SJ order and multiple emails and conf. re same.	1.8	
12/13/2024	JSY	Emails re settlement demand.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/13/2024	JSY	Prep for pretrial conf. and draft outline re same; emails and conf. re same.	2.0	
12/13/2024	JSY	Prep for mock trial; emails re same.	0.3	
12/13/2024	MWB	Conference with GCG and review JY email re Order on Rule 56 motions and strategy.	0.5	
12/13/2024	SJR	Email reports.	0.3	
12/13/2024	BBK	Reviewing emails w/ OC re reciprocal depositions of undisclosed witnesses.	0.1	
12/13/2024	BBK	Reviewing BM email to trial team re recs related to trial subpoenas.	0.1	
12/13/2024	BBK	Emailing w/ trial team re prep for mock jury.	0.1	
12/13/2024	BBK	Conferring w/ JSY re tasks to assist w/ trial prep.	0.2	
12/13/2024	BBK	Emailing w/ P. Lindstrom re trial.	0.2	
12/13/2024	BBK	Analyzing DSS citations to ID any relevant for first trial; emailing w/ JSY and GCG re same.	0.2	
12/13/2024	BBK	Reviewing/analyzing Court Order on dispositive motions.	0.5	
12/13/2024	BBK	Conferring w/ RBGG team re Court Order on dispositive motions.	0.2	
12/13/2024	BBK	Planning/drafting proposed response to Judge Gilliam re: how to rule on MSJ re access barriers.	0.3	
12/13/2024	BBK	Meeting w/ trial team re Order on dispositive motions.	0.5	
12/13/2024	BBK	Phone call w/ JSY re remaining access barrier damages claims for named Ps.	0.1	
12/13/2024	BBK	Research re partial motions for summary judgment on access barriers and updating proposed order to address Judge Gilliam question in order on dispositive motions.	0.9	
12/13/2024	AHS	Discussed mock trial with DLE.	0.5	
12/13/2024	AHS	Communicated with JY and MEC re mock trial.	0.2	
12/13/2024	AHS	Met with JY GCG BM BBK DLE KS MEC and cocounsel to discuss summary judgment ruling.	0.5	
12/13/2024	AHS	Read summary judgment order.	1.0	
12/13/2024	AHS	Identified relevant for mock trial.	0.7	
12/13/2024	BM	Revise memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure based on GCG feedback.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/13/2024	BM	Draft email to BBK as to memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	0.1	
12/13/2024	BM	Draft email to entire trial team circulating memorandum regarding process for serving subpoenas for trial testimony under Rule 45 of the Federal Rules of Civil Procedure.	1.3	
12/13/2024	BM	Review Court's Order denying in part and granting in part cross-motions for summary judgment.	0.5	
12/13/2024	MEC	Read and analyzed MSJ Order.	1.2	
12/13/2024	MEC	Reviewed latest version of mock trial jury instructions.	0.7	
12/13/2024	MEC	Continued trial prep memo.	0.9	
12/13/2024	MEC	MSJ order check in meeting.	0.5	
12/13/2024	MEC	Read email from JSY re MSJ result.	0.1	
12/13/2024	KES	Review documents and information and prepare materials for mock trial; confer team re same; upload Sanction presentation to trial laptop.	8.5	
12/13/2024	DLE	Confer with AHS re case tasks and issues.	0.5	
12/13/2024	DLE	Attend and note-take summary judgment order debrief meeting with team.	0.6	
12/13/2024	DLE	Download, circulate, and review summary judgement order.	0.6	
12/13/2024	DLE	Zoom call with KES and ICS to discuss downloading presentation files for mock trial.	0.8	
12/13/2024	DLE	Run through mock trial presentation with GCG.	1.4	
12/13/2024	DLE	Make edits to mock trial presentation and script per GCG notes.	1.5	
12/14/2024	GCG	(Reduced Charge) Travel to participate in and debrief from mock trial.	0.5	0.5
12/14/2024	GCG	Follow up emails with JSY re MSJ order and appellate strategy.	0.5	
12/14/2024	GCG	Participate in and debrief from mock trial.	8.5	
12/14/2024	JSY	(Reduced Charge) Travel to Mock trial/focus group and conf. w/ team after.	0.5	0.5
12/14/2024	JSY	Mock trial/focus group and conf. w/ team after.	8.7	
12/14/2024	MWB	Review Rule 56 Order.	0.2	
12/14/2024	AHS	(Reduced Charge) Travel from home to mock jury event.	0.1	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
12/14/2024	AHS	Attended and observed mock trial with mock jury.	9.3	
12/14/2024	AHS	(Reduced Charge) Traveled from mock jury event home.	0.2	0.3
12/14/2024	MEC	Mock trial.	9.0	
12/14/2024	KES	Attend mock trial.	6.5	
12/14/2024	DLE	Attend and assist with day-long mock trial.	9.7	
12/15/2024	GCG	Prepare for and participate in meet and confer with defendants' counsel re issues for pretrial conference in light of courts MSJ order.	0.8	
12/15/2024	GCG	Confs with and emails GW-MJ-JSY re defendants' positions and overall strategy and approach.	0.5	
12/15/2024	GCG	Begin review of Defs' letter re: JA standing issue.	0.2	
12/15/2024	JSY	Conf w/ GCG re prep for pretrial conference.	0.6	
12/15/2024	JSY	Emails re meet and confer and Defs' letter re JA standing issue.	0.2	
12/16/2024	GCG	Research and draft emails to associates seeking further legal research on JA standing issue, Rule 54(d) appeal and witness search.	1.0	
12/16/2024	GCG	Meet by Zoom with GW, MJ and JSY to plan pretrial conference.	1.2	
12/16/2024	GCG	Confs with and emails JSY re same and re Brookhurst class representative.	0.5	
12/16/2024	GCG	Review and analyze court's MSJ order and key cases to prepare for pretrial conference.	1.4	
12/16/2024	GCG	Meet by Zoom with RBGG team to discuss research projects.	0.5	
12/16/2024	GCG	Conf with GW re Rule 54(d) appeal for subclasses and plan for settlement conference.	0.3	
12/16/2024	GCG	Draft outline for pretrial conference.	1.0	
12/16/2024	GCG	Review and analyze documents re: Defs' letter re JA standing issue.	0.2	
12/16/2024	GCG	Revise email to ER re decision not to join their filing.	0.1	
12/16/2024	GCG	Review court email re transcript of hearing.	0.1	
12/16/2024	GCG	Confs with and emails JSY re revisions to proposed order and plan for pretrial conference.	0.3	
12/16/2024	JSY	Emails re prep for pretrial conference.	0.3	
12/16/2024	JSY	Meeting with GCG, GBW, MTJ re prep for pretrial conference.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
12/16/2024	JSY	Outreach calls re Brookhurst; emails re same.	1.0	
12/16/2024	JSY	Internal team meeting re research re MSJ order and prep for pretrial conference.	0.8	
12/16/2024	JSY	Prep for pretrial conf., incl. prep for MIL arguments and re-draft PO in light of MSJ order; emails re same; research re same.	5.6	
12/16/2024	AHS	Reviewed emails from team and opposing counsel.	0.5	
12/16/2024	AHS	Conducted legal research re: class representative standing.	5.9	
12/16/2024	AHS	Met with GCG JY BM and MEC re research projects for pretrial conference.	0.8	
12/16/2024	MEC	Research check in meeting.	0.7	
12/16/2024	MEC	Research and memo re issues raised by letter from Defs re JA standing.	9.5	
12/16/2024	KES	Westlaw public record searches for potential Brookhurst resident witness.	1.0	
12/16/2024	KES	Search and review documents for most recent Brookhurst minutes and related documents relating to potential resident witnesses.	1.5	
12/16/2024	KES	Update contact list.	0.1	
12/16/2024	KES	Download and circulate pleading.	0.1	
12/16/2024	KES	Obtain and circulate documents re JA standing.	0.4	
12/16/2024	DLE	Save and circulate materials and recordings from mock trial.	0.4	
12/17/2024	GCG	Review and analyze key cases for 1st trial.	1.4	
12/17/2024	GCG	Research and revise oral argument notes.	1.0	
12/17/2024	GCG	Revise proposes order granting partial summary judgment.	0.3	
12/17/2024	GCG	(Reduced Charge) Travel to conduct pre-trial conference.	0.2	0.3
12/17/2024	GCG	Brief meeting with opposing counsel after conference.	0.1	
12/17/2024	GCG	Meet with co-counsel to plan next steps.	0.3	
12/17/2024	GCG	(Reduced Charge) Travel back to office.	0.2	0.3
12/17/2024	GCG	Confs with JSY re standing issues and overall trial strategy.	0.5	
12/17/2024	GCG	Review and revise pleading in support of proposed order granting partial summary judgment.	0.3	
12/17/2024	GCG	Revise email to ER re need for roster.	0.1	
12/17/2024	GCG	Conduct pre-trial conference.	1.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1140

SERVICES

Date	Person	Description of Services	Hours	Discount
12/17/2024	JSY	Conf w/ ombuds attorney re Brookhurst; emails re same.	0.3	
12/17/2024	JSY	(Reduced Charge) Travel to and from courthouse for pretrial conf.	0.5	0.5
12/17/2024	JSY	Prepare cover pleading for proposed order; conf w/ GCG re same and re next steps; emails re same.	1.5	
12/17/2024	JSY	Prep for pretrial conference.	3.7	
12/17/2024	JSY	Attend pretrial conference and conf. with opposing counsel and co counsel prior to and after conference.	2.0	
12/17/2024	AHS	Reviewed and commented on memo re: named plaintiff standing.	0.4	
12/17/2024	AHS	Reviewed team emails re pretrial hearing.	0.4	
12/17/2024	AHS	Identified and circulated relevant provisions of ADAAG with notes.	0.7	
12/17/2024	AHS	(Reduced Charge) Traveled to courthouse for pretrial hearing.	0.5	0.5
12/17/2024	AHS	Attended pretrial hearing and debriefed with co-counsel.	1.5	
12/17/2024	AHS	(Reduced Charge) Traveled from courthouse back to office.	0.3	0.3
12/17/2024	AHS	Researched cases re: standing at each stage of the litigation.	0.2	
12/17/2024	MEC	Completed research memo re: JA standing.	2.3	
12/17/2024	MEC	Converted notes from mock trial into memo.	0.5	
12/17/2024	MEC	(Billing Judgment) attended final pretrial conference.	0.0	1.0
12/17/2024	MEC	(Billing Judgment) Post FPTC follow up discussion with co counsel.	0.0	0.5
12/17/2024	MEC	(Billing Judgment) travel to ND cal in Oakland for FPTC.	0.0	0.4
12/17/2024	KES	Draft, finalize and efile transcript order; emails with team re same.	0.4	
12/17/2024	KES	Review and arrange for payment of court reporter invoices for depo video and video syncing for trial prep.	0.3	
12/17/2024	KES	Confer team re pretrial conference.	0.3	
12/17/2024	DLE	Create binder for JSY for pretrial conference.	0.9	
12/17/2024	DLE	(Billing Judgment) Travel to courthouse for pre-trial conference with AHS, MEC, GCG, JSY.	0.0	1.0
12/17/2024	DLE	(Billing Judgment) Attend and note-take pre-trial conference; debrief with co-counsel afterwards.	0.0	1.6
12/17/2024	DLE	(Billing Judgment) Travel back from pre-trial conference with AHS, GCG, JSY.	0.0	0.6

SERVICES

Date	Person	Description of Services	Hours	Discount
12/17/2024	KC	Update binder of Key Cases for First Trial for GCG.	0.3	
12/18/2024	GCG	Review MJ revisions to filing in support of proposed order re partial summary judgment.	0.2	
12/18/2024	GCG	Conf with JSY and emails MJ-GW re same.	0.5	
12/18/2024	GCG	Review and revise plaintiffs' settlement offer.	0.5	
12/18/2024	GCG	Confs with GW and JSY and emails BU-MJ re same.	0.5	
12/18/2024	GCG	Review and analyze Rutner letter.	0.2	
12/18/2024	GCG	Confs with GW and JSY and emails team and partners re same.	0.3	
12/18/2024	GCG	Research and begin drafting response to Rutner letter.	0.5	
12/18/2024	GCG	Review documents re JA standing.	0.3	
12/18/2024	GCG	Draft email to clients informing them of summary judgment order and settlement process.	0.2	
12/18/2024	GCG	Conf with JSY re settlement letter for clients to redraft in light of court order.	0.1	
12/18/2024	JSY	Conf w/ Brookhurst resident.	0.2	
12/18/2024	JSY	Edit, finalize and file notice re revised PO re MSJ; emails re same.	0.7	
12/18/2024	JSY	Emails re contact from Brookhurst resident council.	0.3	
12/18/2024	JSY	Emails and conf re settlement proposal.	0.3	
12/18/2024	JSY	Work on revised pretrial documents, including process for same, exhibit list, witness list, statement of case, etc; emails and conf re same.	2.8	
12/18/2024	JSY	Conf and emails re letter re JA.	0.3	
12/18/2024	JSY	Emails re letter re JA.	0.1	
12/18/2024	AHS	Read letter from defendants and new proposed order for entering partial SJ.	0.4	
12/18/2024	AHS	Reviewed emails with cocounsel and opposing counsel.	0.3	
12/18/2024	AHS	Updated case tasks list based on recent orders and pretrial conference and coordinated with courthouse personnel re: reserving attorney lounge.	1.7	
12/18/2024	AHS	Researched potential responses to Defendants' letter.	0.8	
12/18/2024	KES	Emails with court reporter and arrange for payment for pretrial transcript.	0.4	
12/18/2024	KES	Review minute entry and calendar related deadlines.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/18/2024	KES	Review and efile notice of revised proposed order and email Word version re same.	0.5	
12/18/2024	KES	Obtain and review Algarme docs.	0.4	
12/18/2024	KES	Confer AHS re trial logistics.	0.2	
12/18/2024	KES	Update depo video sync files in TextMap.	0.4	
12/19/2024	GCG	Conf with JA re letter from Defs.	0.7	
12/19/2024	GCG	Confs with and emails JSY re same and re overall strategy and approach to Defs' letter re JA.	0.7	
12/19/2024	GCG	Conf re defs' letter.	0.4	
12/19/2024	GCG	Review and analyze Rutner letter and related docs.	0.5	
12/19/2024	GCG	Meet via Zoom with AS, MC and JSY to plan response to Rutner and pre-trial filings.	0.5	
12/19/2024	GCG	Emails MC and AS re further legal research needed for Rutner letter.	0.3	
12/19/2024	GCG	Emails GW-MJ-team re issues raised by Brookdale letter.	0.4	
12/19/2024	GCG	Review and revise proposed order re PSJ and cover pleading.	0.3	
12/19/2024	GCG	Conf with and emails JSY and emails MJ-GW re same.	0.2	
12/19/2024	GCG	Review defendants' revisions to pretrial statement.	0.2	
12/19/2024	GCG	Email GW-MJ-team re Brookdale claim to bench trial.	0.1	
12/19/2024	JSY	Meeting with GCG, MEC, AHS re JA standing and other issues.	0.6	
12/19/2024	JSY	Call with EB and GCG re JA standing issues.	0.5	
12/19/2024	JSY	Multiple calls with JA re letter from Defs.	1.1	
12/19/2024	JSY	Correct pleading re proposed order; multiple emails and conf. re same.	0.7	
12/19/2024	JSY	Review and revise pretrial documents; multiple emails re same and re process for exchanges.	1.6	
12/19/2024	JSY	Multiple conf. w/ GCG re standing issue with JA; emails re same.	1.4	
12/19/2024	AHS	Discussed research and Defendants letter re named plf with MEC.	0.5	
12/19/2024	AHS	Emailed courthouse staff and DLE and KS re attorney lounge reservation.	0.2	
12/19/2024	AHS	Reviewed emails re Brookdale's letter to named plf and related tasks.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/19/2024	AHS	Edited letter to Brookdale in response to their letter re named plaintiff.	5.5	
12/19/2024	AHS	Met with GCG JY MEC to discuss research and upcoming case tasks.	0.6	
12/19/2024	MEC	Discussion re case tasks with AS.	0.3	
12/19/2024	MEC	Sent email to JSY and GCG re team check in meeting.	0.1	
12/19/2024	MEC	Discussion of letter to defs w/ AS.	0.2	
12/19/2024	MEC	Additional research re letter from Defs re JA standing.	0.3	
12/19/2024	MEC	Drafted portion of response letter to ER.	1.4	
12/19/2024	MEC	Reviewed case law re: unruh intent standard for question re certifying question to cal supreme court.	2.1	
12/19/2024	MEC	Team meeting.	0.5	
12/19/2024	DLE	Save and circulate filed pleading.	0.1	
12/20/2024	GCG	Confs with and emails JSY re JA standing issue and pretrial filings.	0.7	
12/20/2024	GCG	Review emails from ER re same.	0.2	
12/20/2024	GCG	Review defendants' revisions to pretrial statement.	0.2	
12/20/2024	GCG	Zoom meeting with co-counsel re pretrial filings, motions in limine and Defs' letter.	1.0	
12/20/2024	GCG	Research and revise letter to defendants.	1.0	
12/20/2024	GCG	Confs with and emails JSY and AS re same and re Brookhurst outreach.	0.5	
12/20/2024	GCG	Confs with JA re Defs' letter re JA standing issue.	0.3	
12/20/2024	GCG	Confs with MA re same.	0.2	
12/20/2024	GCG	Revise documents re JA standing issue.	0.1	
12/20/2024	GCG	Confs with SJR and EG re potential response to Defs' letter.	0.3	
12/20/2024	GCG	Research re same.	0.2	
12/20/2024	GCG	Conf with BH re same.	0.1	
12/20/2024	JSY	Team meeting.	1.0	
12/20/2024	JSY	Two conf. with JA re Defs' letter.	0.4	
12/20/2024	JSY	Multiple conf and emails re Defts' letter.	1.2	
12/20/2024	JSY	Work on pretrial filings; multiple emails and conf. re same.	4.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/20/2024	SJR	Conference with GG re letter from Defendants.	0.4	
12/20/2024	AHS	Met with JY to discuss letter brief and pretrial statement drafting.	0.2	
12/20/2024	AHS	Read e-mails from opposing counsel and team re updated pretrial filings.	0.3	
12/20/2024	AHS	Attended weekly cocounsel meeting with JY GCG and DLE.	1.0	
12/20/2024	AHS	Wrote Plfs' portion of letter brief re Algarme medical records.	0.6	
12/20/2024	AHS	Researched from MJ Beeler laying out letter brief process for discovery disputes and emailed team re same.	0.5	
12/20/2024	AHS	Discussed current status of case and briefing with DLE.	0.5	
12/20/2024	AHS	Research re letter from Defs re JA standing.	0.5	
12/20/2024	AHS	Discussed letter brief re Algarme's medical records with GCG.	0.2	
12/20/2024	AHS	Updated case tasks list.	0.2	
12/20/2024	AHS	Emailed team additional argument for letter re JA standing.	0.5	
12/20/2024	BCH	Call with GCG re: ADA and issues re Defs' letter re JA standing.	0.1	
12/20/2024	BCH	Research case law and communicate with GCG re: Defs' letter.	1.4	
12/20/2024	DLE	Attend and notetake weekly meeting with co-counsel to discuss pre-trial tasks.	1.0	
12/20/2024	DLE	Finalize and circulate notes from meeting with co-counsel.	0.3	
12/20/2024	DLE	Save and circulate filed pleading.	0.1	
12/20/2024	DLE	Discuss recent case updates and tasks with AHS.	0.5	
12/21/2024	GCG	Emails and texts re Defs' letter re JA standing.	0.6	
12/21/2024	GCG	Confs with and emails JSY re same.	0.2	
12/21/2024	GCG	Review ER emails demanding bench trial.	0.2	
12/21/2024	JSY	Conferences with JA and GCG re standing issues.	0.6	
12/21/2024	JSY	Conf. w/ LAE re settlement issues.	0.2	
12/21/2024	JSY	Emails re settlement offer; review same.	0.3	
12/22/2024	GCG	Prepare for and conduct calls re documents re JA standing issues.	0.8	
12/22/2024	GCG	Follow up conversation with JA re same.	0.3	
12/22/2024	GCG	Emails re JA standing issue.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/22/2024	GCG	Emails re JA standing issue.	0.1	
12/22/2024	GCG	Research and revise letter to defendants.	1.0	
12/22/2024	GCG	Review and analyze Goodwin settlement letter and revised settlement.	0.5	
12/22/2024	GCG	Conf with JSY and emails GW-MJ-JSY re same.	0.5	
12/22/2024	GCG	Revise GW response to TG.	0.3	
12/22/2024	GCG	Review and analyze JSY redlines to TG settlement proposal.	0.3	
12/22/2024	GCG	Review and respond to email from SJR re JA standing.	0.1	
12/22/2024	JSY	Conf. w/ GCG re settlement issues.	0.2	
12/22/2024	JSY	Edit draft settlement agreement.	0.8	
12/22/2024	JSY	Conf. w/ GCG and MA re letter re JA.	0.5	
12/22/2024	JSY	Emails re settlement issues.	0.2	
12/23/2024	GCG	Email and text with MA re letter from Defs'.	0.3	
12/23/2024	GCG	Conf with GW, JSY and MJ re meet and confer with defendants.	0.3	
12/23/2024	GCG	Meet and confer with defendants re pretrial filings.	0.8	
12/23/2024	GCG	Revise and send letter to defendants.	1.3	
12/23/2024	GCG	Revise GW letter to TG re settlement offer.	0.3	
12/23/2024	GCG	Confs with an emails JSY re pretrial filings and settlement prospects.	0.8	
12/23/2024	GCG	Review and revise settlement documents.	0.3	
12/23/2024	GCG	Confs with KS re settlement meeting.	0.2	
12/23/2024	GCG	Emails GW re same and re pretrial filings and potential action re JA.	0.4	
12/23/2024	GCG	Emails ER-JB re Algarme meet and confer.	0.2	
12/23/2024	GCG	Research and revise plaintiffs' section of letter brief re medical records.	0.5	
12/23/2024	GCG	Confs with and emails JSY and AS re same.	0.4	
12/23/2024	JSY	Internal meeting before meet and confer.	0.3	
12/23/2024	JSY	Meet and confer with Defs.	0.6	
12/23/2024	JSY	Draft and finalize stip re MILs.	0.4	
12/23/2024	JSY	Work on settlement issues; multiple emails and conf re same.	2.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/23/2024	JSY	Conf and emails re letter brief re medical records; research re same.	0.5	
12/23/2024	JSY	Work on pretrial filings, including pretrial statement.	2.2	
12/23/2024	SJR	Email to GG and JY.	0.2	
12/23/2024	AHS	Read current version of letter to defendants.	0.3	
12/23/2024	AHS	Drafted plaintiffs' statement in discovery dispute letter brief re Algarme medical records.	6.9	
12/23/2024	AHS	Discussed letter brief response with GCG and JY.	0.2	
12/23/2024	BCH	Communicate with GCG re: case law.	0.1	
12/23/2024	BCH	Review draft letter.	0.1	
12/23/2024	BCH	Research questions for GCG re: legal arguments re standing issue.	1.6	
12/23/2024	BCH	Communicate with GCG re: standing research.	0.1	
12/23/2024	DLE	Save and circulate filed pleading.	0.1	
12/23/2024	DLE	Pull and send filed pleading to AHS.	0.1	
12/24/2024	GCG	Revise plaintiffs' section of medical records letter brief.	0.3	
12/24/2024	GCG	Emails co-counsel and defendants' counsel re same.	0.2	
12/24/2024	GCG	Revise plaintiffs' letter brief re Brookhurst residency list.	0.2	
12/24/2024	GCG	Emails co-counsel and defendants' counsel re same.	0.2	
12/24/2024	GCG	Confs with and emails JSY re pretrial statement settlement letter and term sheet, jury instructions and JA letter.	0.5	
12/24/2024	GCG	Email SJR and JSY re letter re JA standing.	0.1	
12/24/2024	GCG	Emails opposing counsel re trial date meet and confer and Algarme meet and confer.	0.3	
12/24/2024	GCG	Begin drafting memo to file.	0.1	
12/24/2024	GCG	Begin drafting supporting documents and motion to seal.	0.1	
12/24/2024	JSY	Edit injunctive term sheet; emails re same.	0.9	
12/24/2024	JSY	Draft and edit pretrial statement and neutral statement; multiple emails and conf. re same.	1.9	
12/24/2024	JSY	Edit letter to Plaintiffs; emails re same.	0.6	
12/24/2024	JSY	Conf. w/ JA re status of letter.	0.2	
12/24/2024	JSY	Emails and conf. re status of issue with letter re standing issue.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/24/2024	JSY	Emails re witness times and MILs.	0.3	
12/24/2024	SJR	Emails with GG.	0.2	
12/24/2024	SJR	Emails re Defendants' letter.	0.2	
12/26/2024	GCG	Confs with and emails JSY re pretrial statement, exhibit list, jury instructions and settlement prospects.	1.0	
12/26/2024	GCG	Review and revise talking points for meeting with GW and KS re settlement.	0.2	
12/26/2024	GCG	Review and analyze Gilliam decision denying partial summary judgment.	0.2	
12/26/2024	GCG	Conf with MWB re same.	0.2	
12/26/2024	GCG	Emails MWB-SJR-team re defendants' withdrawal of demand letter to JA.	0.2	
12/26/2024	GCG	Email MA-JSY re standing issue.	0.2	
12/26/2024	GCG	Review ER changes to medical record letter brief.	0.2	
12/26/2024	GCG	Meet with GW, MJ and JSY to plan response to ER demands re trial.	1.0	
12/26/2024	GCG	Research and draft response to ER.	1.0	
12/26/2024	GCG	Email ER re dates for trials 2 and 3.	0.1	
12/26/2024	GCG	Outreach efforts to potential Brookhurst class representatives.	0.9	
12/26/2024	GCG	Conf with TM re partner who left Brookdale.	0.3	
12/26/2024	GCG	Legal research re Unruh Act appeal.	0.2	
12/26/2024	GCG	Email KS re court order denying PSJ.	0.2	
12/26/2024	JSY	Meeting with GCG, GBW, MTJ re pretrial filings.	0.7	
12/26/2024	JSY	Conf. w/ JA re withdrawal of letter from Defs.	0.2	
12/26/2024	JSY	Emails with MA re standing issue.	0.2	
12/26/2024	JSY	Multiple conf re settlement; draft points re same and edit docs re same.	1.6	
12/26/2024	JSY	Review order re SJ; emails re same.	0.3	
12/26/2024	JSY	Work on pretrial filings; emails re same.	3.2	
12/26/2024	MWB	Emails re pre-trial rulings, standing.	0.3	
12/26/2024	MWB	Meeting with GCG re strategy.	0.5	
12/26/2024	SJR	Emails with GG, MWB re status.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/26/2024	DLE	Save and circulate filed pleadings; update calendar re new deadlines.	0.2	
12/27/2024	GCG	Prepare for and conduct meeting with KS, GW and MJ re settlement issues and plan.	1.3	
12/27/2024	GCG	Follow up emails GW re same.	0.2	
12/27/2024	GCG	Confs with and emails JSY re pretrial statement, jury motion, medical records motion and trial preparation.	1.0	
12/27/2024	GCG	Review and analyze defendants' motions for jury trial and to reopen medical records.	1.0	
12/27/2024	GCG	Meet with co-counseling team to plan pretrial filings.	0.7	
12/27/2024	GCG	Outreach to Brookhurst residents.	0.3	
12/27/2024	GCG	Research and draft memo to file re settlement issues.	1.0	
12/27/2024	GCG	Research and draft memo to file re conversations with MA.	0.8	
12/27/2024	JSY	Team meeting.	0.7	
12/27/2024	JSY	Multiple emails and conf w/ GCG re settlement issues.	1.0	
12/27/2024	JSY	Work on pretrial filings, including revising pretrial statement, MILs, witness list, ROG and depo designations.	5.5	
12/27/2024	LHW	Review and organize recently filed pleadings.	0.5	
12/28/2024	GCG	Emails GW-KS re outreach from TG re settlement.	0.2	
12/28/2024	GCG	Conf with JSY and email trial team re defendants' verdict form and request to expedite opposition to bench trial.	0.5	
12/28/2024	GCG	Zoom meeting with KS, GW and MJ to discuss TG outreach and settlement prospects.	0.4	
12/28/2024	GCG	Update memo to file re same.	0.3	
12/28/2024	GCG	Review and analyze witness list for trial.	0.2	
12/28/2024	GCG	Emails trial team re jury fees research, Zoom testimony right, subpoenas and trial preparation.	0.2	
12/28/2024	GCG	Emails JSY re settlement prospects.	0.1	
12/28/2024	JSY	Conf. w/ GCG re settlement issues; emails re same.	0.2	
12/29/2024	GCG	Emails GW, MJ and JSY re settlement letter to clients.	0.3	
12/29/2024	GCG	Emails JSY-trial team re revisions to trial brief and voir dire questions.	0.3	
12/29/2024	JSY	Emails re settlement.	0.2	
12/29/2024	JSY	Edit MIL No. 5 and emails re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/29/2024	JSY	Prepare letter re settlement for clients; emails re same.	0.3	
12/30/2024	GCG	Revise and send letters to named plaintiffs regarding potential settlement.	1.1	
12/30/2024	GCG	Confs with JSY and KC and emails GW-MJ re same.	0.5	
12/30/2024	GCG	Conf with JA re settlement and visit to Brookhurst.	0.5	
12/30/2024	GCG	Conf with JA and MA re same.	0.2	
12/30/2024	GCG	Meet with GW, MJ and JSY to discuss settlement conference and pretrial filings.	0.5	
12/30/2024	GCG	Review JSY draft email to ER re various trial issues.	0.2	
12/30/2024	GCG	Meet with MEC, AS and JSY to plan opposition to bench trial and re-opening of discovery.	0.5	
12/30/2024	GCG	Research re jury fees.	0.3	
12/30/2024	GCG	Email GW-team re same.	0.1	
12/30/2024	JSY	Emails re depos.	0.1	
12/30/2024	JSY	Internal team meeting re oppositions to Brookdale's two motions.	0.5	
12/30/2024	JSY	Meeting with GW and GCG re settlement and pretrial issues.	0.8	
12/30/2024	JSY	Draft points re settlement issues.	0.5	
12/30/2024	JSY	Finalize letters for clients and multiple conf. and emails re settlement issues.	1.5	
12/30/2024	JSY	Draft and edit pretrial documents, incl. MILs; emails and conf. re same.	4.2	
12/30/2024	AHS	Call with MEC GCG JY re tasks and opposition drafting.	0.5	
12/30/2024	AHS	Reviewed emails and filings from 12/25 through 12/19.	1.5	
12/30/2024	AHS	Read Defs' letter brief and mot to reopen discovery.	0.5	
12/30/2024	AHS	Drafted opp to Defs' mot to reopen discovery.	7.4	
12/30/2024	MEC	Read through mot for bench trial and began outline of opposition.	0.9	
12/30/2024	MEC	Team check in meeting with JSY GCG AS.	0.5	
12/30/2024	MEC	Writing and researching opposition to defs mot for bench trial.	5.8	
12/30/2024	LHW	Review and organize recently filed pleadings.	0.1	
12/30/2024	KC	Confer with GCG re scheduling meetings with class members.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
12/30/2024	KC	Draft email to JSY and co-counsel re Gay's availability for client meetings.	0.2	
12/31/2024	GCG	Research and revise Grunfeld declaration IOT motion to reopen discovery.	1.0	
12/31/2024	GCG	Research and revise MPAs IOT motion to reopen discovery.	2.5	
12/31/2024	GCG	Confs with JSY, AS and KES emails co-counsel re revisions to opposition.	0.5	
12/31/2024	GCG	Oversee e-filing of opposition pleadings.	0.2	
12/31/2024	GCG	Draft report on JA potential visit to Brookhurst.	0.3	
12/31/2024	GCG	Emails GW-MJ-BU re same.	0.1	
12/31/2024	GCG	Conf with and email JSY re settlement conference preparation.	0.2	
12/31/2024	GCG	Email Judge Spero re same.	0.2	
12/31/2024	GCG	Communications with named plaintiffs re settlement letter and conference.	0.2	
12/31/2024	GCG	Emails GW-team re revised verdict form and pretrial statement and other filings.	0.3	
12/31/2024	GCG	Email GW re jury fees.	0.1	
12/31/2024	GCG	Email JSY re standing research.	0.1	
12/31/2024	JSY	Emails re research re standing; research same.	0.6	
12/31/2024	JSY	Research re Opp to admin motion; emails re same.	0.3	
12/31/2024	JSY	Draft email for JS re settlement conf.; conf. w/ GCG re same.	0.2	
12/31/2024	JSY	Research re zoom testimony.	0.2	
12/31/2024	JSY	Prepare objections to depo designations; emails re same.	1.3	
12/31/2024	JSY	Review and edit opp re reopening discovery; emails re same.	0.5	
12/31/2024	JSY	Emails and conf re settlement term sheets.	0.2	
12/31/2024	AHS	Drafted GCG declaration and exhibits ISO plfs' opp to defs' mot to modify the reopen discovery.	0.7	
12/31/2024	AHS	Researched proper mechanism for moving court to modify scheduling order to reopen discovery.	1.4	
12/31/2024	AHS	Edited and citechecked plfs opp to defendants' mot to reopen discovery.	3.3	
12/31/2024	MEC	Research and writing opp to motion for bench trial.	5.0	
12/31/2024	KES	Finalize and efile opposition to motion.	0.5	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1151

SERVICES

Date	Person	Description of Services	Hours	Discount
12/31/2024	KC	Emails re meetings with class representatives.	0.4	
12/31/2024	KC	Respond to 2 emails re: scheduling meeting with GCG and availability.	0.4	
12/31/2024	KC	Emails re meetings with class representatives.	0.2	
1/1/2025	GCG	Review KS report on 90-minute call with TG.	0.1	
1/2/2025	GCG	Prepare for and conduct meetings with 5 named plaintiffs and co-counsel re potential settlement.	2.5	
1/2/2025	GCG	Draft memo to file re same and re KS meeting with TG.	1.0	
1/2/2025	GCG	Revise letter to clients re settlement.	0.6	
1/2/2025	GCG	Conferences with JSY re pre-trial statement, trial preparation, Algarme trip to Brookhurst, and settlement prospects.	1.0	
1/2/2025	GCG	Conference with and email MA re trip to Brookhurst and preparation for trial.	0.4	
1/2/2025	GCG	Emails with team re same.	0.2	
1/2/2025	GCG	Meet with JSY and MEC to plan opposition to jury trial motion.	0.3	
1/2/2025	GCG	Meet with AS, KES, and JSY to plan trip to Brookhurst and further research needed on standing.	0.4	
1/2/2025	GCG	Review and comment on neutral statement.	0.2	
1/2/2025	GCG	Conference with GW re email from Judge Spero and trial hurdles.	0.2	
1/2/2025	GCG	Revise settlement statement.	0.3	
1/2/2025	GCG	Emails with Defendants and trial team re exhibit objections and jury instruction one pagers.	0.3	
1/2/2025	GCG	Conference with JSY and email trial team re sexual harassment incident at Brookhurst documented by DSS.	0.2	
1/2/2025	JSY	Conf w/ SJR re settlement issues.	0.3	
1/2/2025	JSY	Meetings with clients re settlement.	1.2	
1/2/2025	JSY	Emails re inquiry re San Ramon.	0.1	
1/2/2025	JSY	Conf and emails re video of Brookhurst visit.	0.8	
1/2/2025	JSY	Work on pretrial filings and trial prep; multiple conf and emails re same.	4.1	
1/2/2025	JSY	Multiple conf and emails re settlement conf process.	0.5	
1/2/2025	SJR	Conference with JY re case.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1152

SERVICES

Date	Person	Description of Services	Hours	Discount
1/2/2025	AHS	Met with GCG JY and KS to discuss standing and plaintiff Jeanette Algarme.	0.6	
1/2/2025	AHS	Read Defendants' motions in limine.	0.7	
1/2/2025	AHS	Researched standing.	1.1	
1/2/2025	AHS	Reviewed tax forms filed by Brookdale.	0.7	
1/2/2025	AHS	Researched stipulations.	1.3	
1/2/2025	MEC	Discussion with GCG and JSY re: opp to bench trial mot.	0.3	
1/2/2025	MEC	Drafting opp to bench trial motion.	7.2	
1/2/2025	KES	TC and email with J. Curio re video for trial demonstrative.	0.6	
1/2/2025	KES	Review logistics for visit to Brookhurst and confer GCG re same.	0.9	
1/2/2025	KES	Review and gather public information re Brookdale in connection with trial prep.	0.9	
1/2/2025	KES	Review documents in connection with client trial prep and confer DE re same.	0.5	
1/2/2025	DLE	Compile Algarme materials for binder for GCG.	1.2	
1/2/2025	KC	Confer with GCG and JSY re scheduling status for meeting with class member.	0.1	
1/3/2025	GCG	Prepare for and conduct meetings with SS, BJH and ML to discuss potential damages settlement demand.	1.2	
1/3/2025	GCG	Conferences with and emails JSY re same and re plan for settlement conference.	0.7	
1/3/2025	GCG	Research and revise draft trial brief.	1.0	
1/3/2025	GCG	Review and revise draft opposition to bench trial.	0.5	
1/3/2025	GCG	Review and revise Grunfeld declaration in opposition to bench trial.	0.3	
1/3/2025	GCG	Conference with and emails MEC re same.	0.2	
1/3/2025	GCG	Prepare for and conduct meeting with co-counsel team to plan for trial preparation and pre-trial filings.	1.1	
1/3/2025	GCG	Plan trip to Brookhurst.	0.2	
1/3/2025	GCG	Texts with JA and MA re same.	0.2	
1/3/2025	GCG	Conference with and emails KES re same.	0.2	
1/3/2025	GCG	Conference with JSY re pre-trial statement.	0.2	
1/3/2025	GCG	Emails AS-GW-team re standing legal research.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1153

SERVICES

Date	Person	Description of Services	Hours	Discount
1/3/2025	GCG	Emails MJ-team re jury instructions and change in policy research.	0.2	
1/3/2025	JSY	Meetings with clients re settlement issues.	0.9	
1/3/2025	JSY	Team meeting.	1.2	
1/3/2025	JSY	Edit and finalize letters to clients re settlement; send letters.	0.6	
1/3/2025	JSY	Draft and edit pretrial documents; multiple emails and conf. re same.	4.3	
1/3/2025	AHS	Discussed status and pretrial work with DLE.	0.8	
1/3/2025	AHS	Attended weekly cocounsel meeting.	1.1	
1/3/2025	AHS	Researched stipulations and their limits and circulated cases to team.	1.5	
1/3/2025	AHS	Researched standing for pretrial statement and wrote memo.	3.1	
1/3/2025	MEC	Read and proofed draft opp to motion for bench trial.	2.3	
1/3/2025	MEC	Call with JSY re: legal question about jury trial.	0.1	
1/3/2025	MEC	Weekly cocounsel meeting.	1.2	
1/3/2025	MEC	Drafting GCG decl ISO opp to motion for bench trial.	1.7	
1/3/2025	MEC	Tracked down algarme dec iso mot for class cert for GCG to prep trial brief.	0.1	
1/3/2025	MEC	Research re WAV-accessible Ubers for Algarme's visit to Brookhurst.	0.2	
1/3/2025	MEC	Call with GCG re demonstratives question.	0.1	
1/3/2025	MEC	Meeting with GCG to discuss changes to opp to defs mot for bench trial.	0.3	
1/3/2025	KES	Research options and book transportation for client for Jan 9 Brookhurst visit in connection with trial prep.	3.0	
1/3/2025	KES	Participate in team Zoom meeting with co-counsel re trial prep.	1.2	
1/3/2025	KES	Review BM memo re potential trial witnesses and subpoenas and consider next steps; prepare draft subpoena and confer team re same.	0.9	
1/3/2025	KES	Follow up with videographer re trial demonstrative.	0.2	
1/3/2025	KES	Gather information for GCG in connection with Brookhurst visit and client meeting.	0.5	
1/3/2025	DLE	Attend and note-take weekly meeting with co-counsel.	1.2	
1/3/2025	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/3/2025	DLE	Discuss case tasks and assignments with AHS.	0.8	
1/4/2025	GCG	Review and revise joint pretrial statement.	0.4	
1/4/2025	GCG	Conferences with JSY and emails JSY-MJ-GW re revisions to same.	0.7	
1/4/2025	GCG	Review and analyze Brookhurst barriers.	0.2	
1/4/2025	GCG	Email MJ-team re same.	0.1	
1/4/2025	GCG	Continued planning for visit to Brookhurst.	0.2	
1/4/2025	GCG	Email team re pre-trial schedule and preparation plan.	0.2	
1/4/2025	GCG	Continued revision of trial brief.	0.2	
1/4/2025	GCG	Emails JSY-AS re same.	0.1	
1/4/2025	GCG	Email MEC re bench trial opposition revisions.	0.2	
1/4/2025	JSY	Edit pretrial statement; multiple emails and conf. re same.	1.7	
1/4/2025	JSY	Emails and conf. re taxable costs issue; research re same.	0.3	
1/4/2025	JSY	Review and edit trial brief.	0.2	
1/4/2025	MEC	Edits and additional research to and for the opp to mot for bench trial.	5.4	
1/5/2025	GCG	Revise case to do list.	0.1	
1/5/2025	GCG	Draft memo to file re class representative calls and Zooms.	0.2	
1/5/2025	GCG	Conf with MEC and emails MJ-GW re revisions to opposition to bench trial.	0.4	
1/5/2025	GCG	Emails JSY re voir dire and settlement issues.	0.1	
1/5/2025	GCG	Emails GW-JSY re meet and confer with defendants.	0.1	
1/5/2025	GCG	Review and revise opposition to motion for bench trial.	0.2	
1/5/2025	GCG	Email MEC re same.	0.1	
1/5/2025	GCG	Emails JSY-team re client responses to letter and voir dire questions.	0.1	
1/5/2025	JSY	Emails re bench trial opp.	0.1	
1/5/2025	JSY	Emails re settlement letter acknowledgments from clients.	0.2	
1/5/2025	JSY	Emails re settlement.	0.2	
1/5/2025	JSY	Emails re pretrial filings.	0.1	
1/5/2025	MEC	Call w GCG to discuss draft opp to mot for bench trial.	0.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/5/2025	MEC	Edited opp to mot for bench trial.	0.2	
1/5/2025	MEC	Emailed opp to mot for bench trial to team for review.	0.2	
1/5/2025	MEC	Incorporated comments from cocounsel to opp to mot for bench trial.	0.7	
1/6/2025	GCG	Review and revise opposition to bench trial.	1.0	
1/6/2025	GCG	Review and revise Grunfeld declaration ISO same.	0.7	
1/6/2025	GCG	Confs w/JSY, MEC and emails GW team re revisions to same.	1.0	
1/6/2025	GCG	Review and revise trial brief.	0.3	
1/6/2025	GCG	Confs w/JSY, AS re same and re Brookhurst Barriers.	0.3	
1/6/2025	GCG	Meet w/ Co-counseling team to prepare for meet and confer w/Defendants.	0.8	
1/6/2025	GCG	Follow-up conferences and emails w/JSY re same and re Algarme barriers and exhibit objections.	0.5	
1/6/2025	GCG	Meet and Confer w/Defs' counsel re pre-trial statement and jury instructions.	1.5	
1/6/2025	GCG	Oversee e-filing of bench trial opposition.	0.2	
1/6/2025	GCG	Conf w/KES and email team re subpoenas to witnesses.	0.2	
1/6/2025	GCG	Text w/named Plaintiff LV re potential settlement.	0.1	
1/6/2025	GCG	Voicemail and email w/HF re potential settlement.	0.1	
1/6/2025	GCG	Review settlement documents.	0.1	
1/6/2025	GCG	Email Defs and court clerk re settlement conference attendees.	0.2	
1/6/2025	JSY	Review and edit Opp to Motion for bench trial; emails and conf. re same.	1.3	
1/6/2025	JSY	Meet and confer re pretrial statement.	1.5	
1/6/2025	JSY	Emails re MIL opp.	0.2	
1/6/2025	JSY	Internal team meeting to prep for meet and confer and re objections to exhibits and discovery designations.	1.2	
1/6/2025	JSY	Emails re subsequent remedial measures.	0.1	
1/6/2025	JSY	Work on pretrial filings, incl. responses to objections and other documents.	3.7	
1/6/2025	JSY	Conf. and emails re bench trial motion; revise decl. re same.	0.5	
1/6/2025	JSY	Multiple Conf. w/ GCG re settlement issues; emails re same.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/6/2025	AHS	Citechecked plaintiffs' trial brief.	1.5	
1/6/2025	AHS	Call with GCG re Mastin Brookhurst report.	0.2	
1/6/2025	AHS	Prepared materials re barriers at Brookhurst.	0.3	
1/6/2025	AHS	Called and emailed intake from San Ramon.	0.2	
1/6/2025	AHS	Drafted Opp to Def's MIL re subsequent remedial measures.	2.6	
1/6/2025	MEC	Call with JSY re edits to opp to mot for bench trial.	0.2	
1/6/2025	MEC	Incorporated JSY edits/comments to opp to motion for bench trial and cite checked.	2.3	
1/6/2025	MEC	Call with GCG re opp to motion to bench trial.	0.1	
1/6/2025	MEC	Reviewed GCG edits to draft opp to bench trial.	0.3	
1/6/2025	MEC	Conversation re opp to motion for bench trial with GCG.	0.2	
1/6/2025	MEC	Made edits to declaration ISO opp to motion for bench trial.	0.2	
1/6/2025	MEC	Edited declaration and cross checked citations in opposition to mot for bench trial.	0.5	
1/6/2025	MEC	Reviewed GCG edits to opposition to mot for bench trial.	0.3	
1/6/2025	MEC	Call w/ KS re filing opp to bench trial mot.	0.1	
1/6/2025	KES	Review, efile and circulate opposition to motion for bench trial.	0.4	
1/6/2025	KES	Confirm transportation booking for client for Brookhurst visit.	0.3	
1/6/2025	KES	Email to J. Curio confirming date for visit to Brookhurst for trial demonstrative.	0.2	
1/6/2025	KES	Review list of potential witnesses and revise subpoena memo regarding ability and need to subpoena; email team re same; confer GCG re same.	0.7	
1/6/2025	KES	Review witness contact information and email co-counsel re friendly witness address.	0.4	
1/6/2025	KES	Online research regarding location of adverse trial witnesses in connection with subpoena preparation.	0.9	
1/6/2025	KES	Gather photos and information in preparation for Brookhurst visit.	1.5	
1/6/2025	KES	Review depo notice and calendar depo.	0.1	
1/6/2025	KES	Review pretrial order and email team re logistics for hard copies of revised pretrial filings.	0.2	
1/6/2025	DLE	Locate and send JSY exhibit from Relativity.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1157

SERVICES

Date	Person	Description of Services	Hours	Discount
1/7/2025	GCG	Prepare for and conduct settlement conference with Magistrate Judge Spero.	7.3	
1/7/2025	GCG	Follow up conf with JSY and email partners re status.	0.3	
1/7/2025	GCG	Confs with and emails KES re subpoenas to witnesses, planning trial presentation and exhibits.	0.3	
1/7/2025	GCG	Conf with GW and emails team re visit to Brookhurst.	0.2	
1/7/2025	GCG	Review voir dire questions.	0.1	
1/7/2025	GCG	Email JSY re same.	0.1	
1/7/2025	GCG	Review trial brief.	0.1	
1/7/2025	GCG	Conf with GW and email team re same.	0.1	
1/7/2025	GCG	Review proposed stipulation re further remedial measures.	0.1	
1/7/2025	GCG	Email ER re subpoenas and pretrial statement.	0.1	
1/7/2025	JSY	Prep for and attend MSC; multiple conf and emails re same.	8.0	
1/7/2025	JSY	Edit MIL opp; emails re same.	0.7	
1/7/2025	AHS	Drafted portion of Opp to MIL re subsequent remedial measures concerning Defs' cases.	1.7	
1/7/2025	AHS	Read Plfs' opp to defs' mot for a bench trial.	0.3	
1/7/2025	AHS	Edited and revised draft opp to Defs' MIL based on subsequent remedial measures.	6.1	
1/7/2025	MEC	Research on FRE 407 and non permanent remedial measures for MIL on FSP evidence.	1.0	
1/7/2025	MEC	Email to AHS re research on FRE 407.	0.1	
1/7/2025	KES	Draft form of cover letters for friendly and adverse witnesses to accompany subpoenas and follow up with GCG and co-counsel re same.	0.8	
1/7/2025	KES	Email with GCG re adverse witnesses to subpoena.	0.2	
1/7/2025	KES	Review courtroom technology information and email trial team re scheduling pretrial court room visit.	0.4	
1/7/2025	KES	Review and circulate recent Scotts Valley DSS report.	0.1	
1/7/2025	KES	Review status of trial exhibit list and email trial team re exhibit preparation.	0.3	
1/7/2025	KES	Review transportation confirmation for client Brookhurst visit.	0.1	
1/7/2025	KES	Review and update script for Jan 9 Brookhurst visit.	0.4	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1158

SERVICES

Date	Person	Description of Services	Hours	Discount
1/7/2025	KES	Confer GCG re schedule of trial witnesses and draft rough initial schedule re same.	0.6	
1/7/2025	KES	Gather and review photos in connection with Brookhurst visit.	0.8	
1/7/2025	KES	Follow up re outstanding video sync depo for expert.	0.2	
1/7/2025	KES	Review standing orders and other materials re form of trial exhibits.	0.2	
1/7/2025	KES	Review team emails re status of revised pre-trial filings and plan for efiling and hard copy binders.	0.2	
1/7/2025	DLE	Confer with KES re preparing exhibits for trial.	0.1	
1/8/2025	EG	Providing direct and cross outlines.	0.3	
1/8/2025	GCG	Review and revise draft pretrial statement.	0.3	
1/8/2025	GCG	Meet with GW, MJ and JSY to discuss defendants' inserts and revisions.	0.6	
1/8/2025	GCG	Revise and oversee filing of trial brief.	0.4	
1/8/2025	GCG	Confs with MJ and JSY and emails defendants revisions to jury instruction one pagers.	0.6	
1/8/2025	GCG	Confs with and emails JSY re pretrial filings and preparation for trial work.	1.0	
1/8/2025	GCG	Draft comprehensive list of pretrial tasks for RBGG team.	0.6	
1/8/2025	GCG	Review defendants' changes to neutral statement.	0.5	
1/8/2025	GCG	Outreach to Brookhurst witness.	0.1	
1/8/2025	GCG	Meet with KES and DE to plan visit to Brookhurst.	0.4	
1/8/2025	GCG	Review and analyze Mastin barrier list.	0.2	
1/8/2025	GCG	Conf with JA and MA re visit to Brookhurst.	0.4	
1/8/2025	GCG	Email videogrpaher re same.	0.1	
1/8/2025	GCG	Emails BU-AS re MILs.	0.2	
1/8/2025	GCG	Review defendants' changes to jury instructions.	0.3	
1/8/2025	GCG	Review Judge Spero order re settlement conference.	0.1	
1/8/2025	GCG	Meet with MEC re letter to Judge Spero.	0.2	
1/8/2025	JSY	Edit, finalize and file pretrial filings; multiple conf. and emails re same.	10.7	
1/8/2025	SJR	Email report from GG.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1159

SERVICES

Date	Person	Description of Services	Hours	Discount
1/8/2025	AHS	Incorporated edits from JY to opp to defs' MIL re subsequent remedial measures and circulated to cocounsel.	0.2	
1/8/2025	AHS	Reviewed joint jury instructions and e-mails re same.	0.7	
1/8/2025	AHS	Incorporated edits from co-counsel in opp to defs' MIL re subsequent remedial measures, did final proofread, and finalized for filing.	0.4	
1/8/2025	AHS	Edited and finalized opp to Defs' MIL re supplemental expert reports.	0.8	
1/8/2025	AHS	Finalize all opps to Defs MIL for filing.	0.7	
1/8/2025	AHS	Reviewed correspondence with co-counsel and opposing counsel re coordination and filing joint pretrial filings.	0.8	
1/8/2025	AHS	Phone call with intake re: Brookdale San Ramon.	0.7	
1/8/2025	MEC	Reviewed, cite checked and revised trial brief.	2.4	
1/8/2025	MEC	Conversation with GCG re various pretrial filing questions.	0.2	
1/8/2025	MEC	Reviewed Judge Gilliam's pretrial/trial order for guidance re trial brief.	0.1	
1/8/2025	MEC	Reviewed GCG edits to draft trial brief.	0.2	
1/8/2025	MEC	Conversation with GCG re letter to Judge Spero re mediation.	0.3	
1/8/2025	KES	Emails wtih videographer and transportation company re logistics for Brookhurst visit.	0.3	
1/8/2025	KES	Review and efile voir dire and trial brief; download and circulate filed docs.	0.7	
1/8/2025	KES	Finalize cover letter and form of subpoena for friendly witnesses; arrange for preparation of individual letters; confer DLE re same.	0.9	
1/8/2025	KES	Prepare photos corresponding to certain barriers in connection with Brookhurst visit; confer GCG and DLE re plan for visit.	1.6	
1/8/2025	KES	Review minute entry and calendar related deadlines.	0.2	
1/8/2025	KES	Provide attorneys with information in connection with pretrial filings.	0.3	
1/8/2025	KES	Assist wtih finalization of and efile Joint Neutral Statements and Pretrial statement; confer team re same; email Word docs to chambers.	2.8	
1/8/2025	KES	Begin preparation of binders for hard copy submission of revised pretrial submissions.	1.7	
1/8/2025	DLE	Prep subpoenas for friendly witnesses with KES.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1160

SERVICES

Date	Person	Description of Services	Hours	Discount
1/8/2025	DLE	Create plaintiff binder for trial by compiling exhibits and other materials.	1.3	
1/9/2025	GCG	(Reduced Charge) Travel to conduct visit to Brookhurst w/ J. Algarme.	2.5	2.5
1/9/2025	GCG	Meet w/J. Algarme to prepare trial testimony.	2.0	
1/9/2025	GCG	Work on J. Algarme demonstratives.	0.3	
1/9/2025	GCG	Conf w/JSY and email team re trial preparation.	0.2	
1/9/2025	GCG	Emails JSY-MEC re settlement letter to Judge Spero.	0.2	
1/9/2025	GCG	Emails JSY-RS re Pls witnesses to subpoena.	0.2	
1/9/2025	GCG	Emails JSY-ER-MJ re Defs refusal to accept subpoena for witnesses.	0.2	
1/9/2025	GCG	Review court order re jury trial reply.	0.1	
1/9/2025	GCG	Email MEC-AS re preparation for pre-trial hearing argument.	0.2	
1/9/2025	GCG	Review and analyze J. Algarme deposition transcripts.	0.3	
1/9/2025	GCG	Conduct visit to Brookhurst w/ J. Algarme.	1.5	
1/9/2025	JSY	Conf. w/ GCG re video and other trial prep issues.	0.4	
1/9/2025	JSY	Conf. w/ MEC re settlement letter.	0.3	
1/9/2025	JSY	Conf. w/ AHS re demonstratives.	0.3	
1/9/2025	JSY	Emails re Brookhurst visit; review video re same.	0.5	
1/9/2025	JSY	Review and edit letter to Judge Spero.	0.7	
1/9/2025	JSY	Multiple emails re class member depos; research re same.	0.8	
1/9/2025	JSY	Emails re San Ramon intake.	0.1	
1/9/2025	JSY	Emails re demonstratives.	0.2	
1/9/2025	JSY	Work on subpoenas and other trial prep, including research re witnesses; multiple emails and conf. re same.	3.3	
1/9/2025	AHS	Edited and circulated notes to team from call with San Ramon intake.	0.6	
1/9/2025	AHS	Watched video footage of plaintiff Algarme's visit to Brookhurst.	0.2	
1/9/2025	AHS	Call with JY re reviewing and updating demonstratives.	0.3	
1/9/2025	AHS	Worked on reviewing and updating extensive chart of all demonstartives.	0.2	
1/9/2025	MEC	Call with JSY re settlement demand letter to Judge Spero.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/9/2025	MEC	Drafted letter to Judge Spero re settlement and algarme visit to Brookhurst.	4.8	
1/9/2025	KES	Finalize and arrange for delivery of hard copy pretrial binders to court.	0.8	
1/9/2025	KES	Review, revise, finalize and send cover letters and trial subpoenas to friendly witnesses; confer JY, DLE and R. Steyer re same.	3.2	
1/9/2025	KES	Research location of adverse witnesses in connection with service of trial subpoenas; confer JY re same and re further investigation.	0.8	
1/9/2025	KES	TCs with transportation company and follow up with GCG re pickup at Brookhurst.	0.2	
1/9/2025	KES	Review emails and photos/video re Algarme Brookhurst visit.	0.4	
1/9/2025	KES	Consider issues relating to trial exhibits, demonstratives, and depo transcripts for trial.	0.3	
1/9/2025	DLE	Confer with KES re courtesy copy binders of revised pre-trial filings and friendly witness subpoenas.	0.3	
1/9/2025	DLE	Save and circulate filed pleadings; print same for pre-trial filings binder.	0.3	
1/10/2025	GCG	Conf w/ TG and email Judge Spero and co-counsel re potential need for time before settlement conference.	0.4	
1/10/2025	GCG	Conf w/ GW-JSY re same.	0.3	
1/10/2025	GCG	Research and revise letter to Judge Spero re Algarme visit and other settlement issues.	1.4	
1/10/2025	GCG	Confs w/JSY-MEC and emails GW-Team re revisions to same.	0.3	
1/10/2025	GCG	Prepare for and conduct co-counseling team meeting re trial preparation.	0.9	
1/10/2025	GCG	Draft emails to ER re J. Algarme visit to Brookhurst.	0.3	
1/10/2025	GCG	Confs w/GW-KES and email team re scope of transcript order.	0.3	
1/10/2025	GCG	Confs w/MEC-AS-DE re preparation for oral arguments at pre-trial conference re reopening discovery and jury versus bench trials.	0.3	
1/10/2025	JSY	Team meeting, including separate meeting with GBW, GCG, BU re term sheet revision.	1.5	
1/10/2025	JSY	Review settlement emails and revisions of term sheet; revise same and multiple emails and conf. re same.	1.0	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/10/2025	JSY	Further revisions to letter to JS re settlement; emails re same.	0.4	
1/10/2025	JSY	Multiple emails and conf. re email to Defs re JA video.	0.3	
1/10/2025	JSY	Trial prep, including witness research and research re standing issues; multiple emails and conf. re same.	3.6	
1/10/2025	JSY	Emails re transcription for trial.	0.1	
1/10/2025	AHS	Updated extensive chart of all demonstratives.	4.3	
1/10/2025	AHS	Discussed pre-trial work with DLE.	0.9	
1/10/2025	AHS	Attended weekly meeting with co-counsel and GCG JY MEC DLE KS.	0.7	
1/10/2025	AHS	Met with GCG DLE and MEC to discuss prep for pretrial hearing.	0.3	
1/10/2025	AHS	Prepared materials for pretrial hearing.	0.7	
1/10/2025	AHS	Confirmed details of Plfs' stays at Brookdale.	0.3	
1/10/2025	MEC	Edits to letter to Judge Spero re settlement.	1.4	
1/10/2025	MEC	Weekly cocounsel meeting.	0.7	
1/10/2025	MEC	Edits to settlement letter to Judge Spero.	0.6	
1/10/2025	MEC	Reviewed reply to bench motion and began outline for hearing.	0.8	
1/10/2025	MEC	Meeting with GCG AS DLE re preparing binders re motions to be argued at pretrial conference.	0.2	
1/10/2025	MEC	Pulled briefing for mot for bench trial to send to DLE for creating binders.	0.4	
1/10/2025	MEC	Call with GCG re letter to Judge Spero re settlement.	0.2	
1/10/2025	MEC	Checked complaint to verify timeline of named plaintiffs residing at Brookdale.	0.3	
1/10/2025	KES	Participate in Zoom meeting with counsel re pretrial tasks; review and suggest additions to agenda re same.	1.0	
1/10/2025	KES	Emails with court reporting services re obtaining original transcripts for trial; review updated witness lists and depo chart in connection with same.	0.6	
1/10/2025	KES	Review and circulate Defs trial transcript order.	0.1	
1/10/2025	KES	Draft, finalize and efile transcript order form for future trial; emails with team re possible realtime and review and email re pricing differences.	0.9	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1163

SERVICES

Date	Person	Description of Services	Hours	Discount
1/10/2025	KES	Coordinate preparation of trial exhibits; confer team re same; email litigation copy service re same; review revised exhibit list re same.	1.3	
1/10/2025	DLE	Discuss upcoming trial tasks with AHS.	0.9	
1/10/2025	DLE	Attend and note-take weekly meeting with co-counsel to discuss pre-trial tasks.	0.8	
1/10/2025	DLE	Finalize and circulate notes from weekly co-counsel meeting.	0.3	
1/10/2025	DLE	Save and circulate filed pleading.	0.1	
1/10/2025	DLE	Download and circulate video of GCG Brookhurst visit.	0.2	
1/10/2025	DLE	Create binder for MEC re bench trial motion briefing.	1.7	
1/10/2025	DLE	Confer with AHS, GCG, MEC re briefing binders for trial prep.	0.2	
1/11/2025	GCG	Meet w/JSY-AS-MEC to review and analyze mock trial video and discuss trial themes and preparation.	2.3	
1/11/2025	GCG	Research draft suggestions for opening arguments.	1.0	
1/11/2025	GCG	Summarize issues from mock trial jurors for use at trial.	0.5	
1/11/2025	GCG	Conf w/JSY re revisions to draft settlement agreement.	0.3	
1/11/2025	GCG	Email JSY-GW re same.	0.1	
1/11/2025	GCG	Conf w/JSY and emails GW-MJ re class member depositions and Pls witness list.	0.5	
1/11/2025	GCG	Conf w/MEC re opposition to bench trial.	0.2	
1/11/2025	GCG	Conf w/AS and emails re standing research and settlement issues.	0.2	
1/11/2025	GCG	Prepare for pre-trial conference.	0.5	
1/11/2025	JSY	Meeting with GCG, AHS, MEC re trial prep.	2.0	
1/11/2025	JSY	Edit settlement agreement; conf. and emails re same; review notes re MSC re same.	2.0	
1/11/2025	JSY	Trial prep and prep for pretrial conference, including reviewing MILs, reviewing witness list and evidence, and multiple emails and conf. re same.	3.3	
1/11/2025	AHS	Met with GCG JY MEC to discuss trial strategy.	2.3	
1/11/2025	AHS	Prepared for pretrial hearing on Defs' mot to reopen discovery.	2.9	
1/11/2025	AHS	Read briefs on motion for bench trial and circulated thoughts.	2.0	
1/11/2025	AHS	Updated master list of all demonstratives.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/11/2025	MEC	Meeting with GCG JSY AHS re mock trial review and general trial prep tasks.	2.3	
1/11/2025	MEC	Call with GCG re reply to mot for bench trial.	0.1	
1/11/2025	MEC	Summaries of key authority for bench trial mot argument prep.	3.0	
1/11/2025	MEC	Emails re golden rule of evidence.	0.1	
1/11/2025	MEC	Sent email re research re hung jury.	0.1	
1/11/2025	MEC	Called witness MM re upcoming trial date.	0.1	
1/11/2025	MEC	Draft feedback for GW on opening based on review of mock trial and review of revised joint pretrial statement.	1.0	
1/12/2025	GCG	Review and analyze cases cites in pre-trial statement and motion for bench trial.	0.7	
1/12/2025	GCG	Email MJ-Team re same.	0.2	
1/12/2025	GCG	Review and analyze court order re standing.	0.3	
1/12/2025	GCG	Email JSY-team re same.	0.1	
1/12/2025	GCG	Revise memo re issues to present at pre-trial conference.	0.3	
1/12/2025	GCG	Review and analyze pre-trial statement.	0.5	
1/12/2025	GCG	Texts J. Algarme re zoom testimony.	0.1	
1/12/2025	GCG	Research re same.	0.4	
1/12/2025	GCG	Emails JSY re Unruh Act and settlement document.	0.2	
1/12/2025	GCG	Emails AS re demonstratives.	0.1	
1/12/2025	JSY	Emails re settlement issues.	0.2	
1/12/2025	JSY	Emails re demonstratives.	0.1	
1/12/2025	JSY	Emails re prep for pretrial conference.	0.2	
1/12/2025	AHS	Researched and circulated findings on standing cases cited in 12/26 SJ order and related law.	1.7	
1/12/2025	KES	Gather trial exhibits; review revised trial exhibit list and confirm accuracy of docs; coordinate with DLE re same.	4.8	
1/12/2025	DLE	Confer with KES re pretrial task of compiling exhibits to upload to flashdrive for judge.	0.2	
1/12/2025	DLE	Compile exhibits to folder for uploading to a flashdrive to present to the court for usage in trial.	2.2	
1/13/2025	GCG	Review pleadings to prepare for pretrial conference.	1.5	
1/13/2025	GCG	Draft and revise outline of pretrial conference.	2.0	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1165

SERVICES

Date	Person	Description of Services	Hours	Discount
1/13/2025	GCG	Confs with JSY and emails GW-team re same.	1.0	
1/13/2025	GCG	Meet via Zoom with co-counseling team to plan pretrial conference.	1.0	
1/13/2025	GCG	Meet via Zoom with GW, MJ, JSY and BU to discuss defendants' revisions to settlement agreement and strategy for same.	0.7	
1/13/2025	GCG	Conf with and emails KES re flash drive projects and pretrial deadlines.	0.3	
1/13/2025	GCG	Conf with JSY re call with Brookhurst resident BL.	0.3	
1/13/2025	GCG	Research re BL.	0.1	
1/13/2025	GCG	Emails MN-team re ADA accommodations at federal court.	0.1	
1/13/2025	GCG	Email AS-DE re binder of materials related to BJH.	0.1	
1/13/2025	GCG	Email AS re research re defendants' lack of diligence.	0.1	
1/13/2025	GCG	Revise and circulate team trial task list.	0.5	
1/13/2025	GCG	Email team re video of Algarme for court review.	0.2	
1/13/2025	JSY	Conf with Brookhurst resident.	0.6	
1/13/2025	JSY	Edit term sheet; meeting with team to discuss and multiple emails re same.	1.5	
1/13/2025	JSY	Team meeting.	1.4	
1/13/2025	JSY	Prep for pretrial conf; multiple emails and conf. Re same.	4.8	
1/13/2025	JSY	Additional emails re settlement.	0.2	
1/13/2025	LAE	Conf with JSY re research and exemplars re zoom testimony issue, research and send exemplars re same.	0.4	
1/13/2025	AHS	Call with cocounsel re preparing demonstratives for trial.	0.7	
1/13/2025	AHS	Reviewed emails and documents re trial issues.	1.3	
1/13/2025	AHS	Identified past briefing on standing issues.	0.7	
1/13/2025	AHS	Attended part of meeting with cocounsel and JY GCG MEC DLE.	1.1	
1/13/2025	AHS	Emailed with team re MILs and cases cited.	0.3	
1/13/2025	MEC	Read through/reviewed revised joint pretrial statement.	2.8	
1/13/2025	MEC	Research into zoom testimony under rule 43.	2.0	
1/13/2025	MEC	Call with GCG re bench trial argument prep.	0.2	
1/13/2025	MEC	Cocounsel meeting.	1.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/13/2025	MEC	Reviewed intake notes for potential trial witness.	0.6	
1/13/2025	MEC	Call w GCG re question about remote testimony.	0.2	
1/13/2025	MEC	Additional research re remote testimony.	0.1	
1/13/2025	KES	Review revised trial witness and depo designation lists and determine original depo transcripts needed from US Legal court reporters re same; email with court reporter and co-counsel re same.	1.2	
1/13/2025	KES	Update calendar re further settlement conference.	0.1	
1/13/2025	KES	(Billing Judgment) Review news and videos re emergency evacuations from nursing homes/assisted living during LA fires and email trial team re same in connection with emergency evacuation issues.	0.0	0.4
1/13/2025	KES	Gather and prepare additional documents and photos for trial exhibits; multiple emails and conferences with DLE re same; confer team re photo formats for same; confirm format of trial exhibit stamp and arrange for stamping of trial exhibits in conformance with standing orders.	5.3	
1/13/2025	DLE	Attend and note-take meeting to discuss pre-trial tasks with co-counsel.	1.2	
1/13/2025	DLE	Finalize and circulate notes from team meeting.	0.4	
1/13/2025	DLE	Locate and compile exhibits with KES for production to the court via flash drive.	1.2	
1/13/2025	KC	Prepares cases for GCG pretrial conference prep.	2.3	
1/14/2025	GCG	Continued review of pleadings and preparation for pretrial conference.	0.4	
1/14/2025	GCG	Review and revise outline of same.	0.8	
1/14/2025	GCG	Review and analyze 1st pre-trial conference transcript.	0.3	
1/14/2025	GCG	Emails JSY-co-counsel re issues to raise at pretrial conference and trial order.	0.5	
1/14/2025	GCG	Email JM re trial.	0.1	
1/14/2025	GCG	Draft email to JB-defendants re Algarme video.	0.3	
1/14/2025	GCG	Review KES notice of manual filing re Algarme video.	0.1	
1/14/2025	GCG	(Reduced Charge) Travel to conduct pretrial conference.	0.5	0.5
1/14/2025	GCG	Meet with co-counsel to discuss settlement.	0.3	
1/14/2025	GCG	Meet with TG and opposing counsel re same.	1.0	
1/14/2025	GCG	(Reduced Charge) Travel courthouse-office.	0.5	0.5

SERVICES

Date	Person	Description of Services	Hours	Discount
1/14/2025	GCG	Follow up meetings with JSY and KES and emails team to plan for trial.	0.5	
1/14/2025	GCG	Conduct pretrial conference.	1.0	
1/14/2025	JSY	Meeting re demonstratives.	0.7	
1/14/2025	JSY	Meeting with Defs re settlement.	1.4	
1/14/2025	JSY	(Reduced Charge) Travel to and from pretrial conf.	0.5	0.5
1/14/2025	JSY	Emails and conf. re demonstratives.	0.5	
1/14/2025	JSY	Review revised term sheet; emails re same.	0.3	
1/14/2025	JSY	Prep for pretrial conf.; emails and conf. re same.	2.7	
1/14/2025	JSY	Emails re jury questionnaire.	0.2	
1/14/2025	JSY	Emails re settlement issues.	0.1	
1/14/2025	JSY	Attend pretrial conference.	2.1	
1/14/2025	AHS	Met with JY to discuss demonstratives and case priorities.	0.2	
1/14/2025	AHS	Met with vendor working on demonstratives and JY and cocounsel.	0.7	
1/14/2025	AHS	(Reduced Charge) Travel to courthouse to preparation for pretrial conference.	0.2	0.3
1/14/2025	AHS	Attended pretrial conference.	1.1	
1/14/2025	AHS	(Reduced Charge) Travel from courthouse back to office.	0.5	0.4
1/14/2025	AHS	Reviewed pretrial motion in preparation for pretrial conference.	0.9	
1/14/2025	AHS	Reviewed binder with named plaintiff materials for direct exam preparation.	0.4	
1/14/2025	AHS	Edited and circulated notes from pretrial conference.	0.6	
1/14/2025	AHS	Preparation for pretrial conference.	0.5	
1/14/2025	MEC	Research re JMOL and motion for partial judgment.	4.0	
1/14/2025	MEC	(Reduced Charge) Travel from office to ND Cal in Oakland for pretrial conference.	0.2	0.3
1/14/2025	MEC	Attended final pretrial conference.	1.0	
1/14/2025	MEC	Updated AS's list of items post hearing with missing tasks.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/14/2025	KES	Review email from discovery service re trial exhibits and possible missing photos; emails with team and confirm sets for photos for use as trial exhibits; confirm additional photos for upload and emails wtih copy service re hard copy quality control set of trial exhibits.	2.5	
1/14/2025	KES	Prepare manual filing notice with draft declaration and arrange for flash drives of Algarme visit for potential filing while at court.	0.7	
1/14/2025	KES	(Billing Judgment) Travel to/from office to courthouse for pre-trial conference and attend pretrial conference.	0.0	3.0
1/14/2025	KES	(Billing Judgment) Prepare for pretrial conference.	0.0	0.8
1/14/2025	DLE	(Billing Judgment) Travel to courthouse for further pretrial conference.	0.0	1.0
1/14/2025	DLE	(Billing Judgment) Attend and note-take further pre-trial conference.	0.0	1.1
1/14/2025	DLE	(Billing Judgment) Travel back to office from further pretrial conference.	0.0	0.9
1/14/2025	DLE	Prepare flash drives containing video of plaintiff visiting facility to proffer to court at upcoming pre-trial conference.	0.5	
1/14/2025	DLE	Prepare trial binders for 2x plaintiffs; review exhibits and confer with AHS re same.	1.8	
1/14/2025	DLE	Confer with discovery vendor re changes to be made to trial binders.	0.5	
1/15/2025	GCG	Draft email to defendants re follow up to pretrial conference.	0.2	
1/15/2025	GCG	Emails team re witness interview and exam drafting.	0.2	
1/15/2025	GCG	Review BU email re staffing issues.	0.1	
1/15/2025	GCG	Review minute order post pretrial conference.	0.1	
1/15/2025	GCG	Email clients re preparation for settlement conference.	0.2	
1/15/2025	GCG	Conf with MH re trial.	0.1	
1/15/2025	GCG	Meet with GW, MJ and JSY to discuss settlement issues.	0.6	
1/15/2025	GCG	Confs with and emails JSY re same.	0.7	
1/15/2025	GCG	Conf with GW re fees and costs in settlement discussions.	0.2	
1/15/2025	GCG	Emails GW team re TG revised agreement.	0.3	
1/15/2025	GCG	Conf with JSY re same and preparation for meeting with Judge Spero.	0.2	
1/15/2025	GCG	Review JSY revisions to TG draft.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1169

SERVICES

Date	Person	Description of Services	Hours	Discount
1/15/2025	GCG	Emails JSY-EMA-GW re monitoring relief.	0.2	
1/15/2025	GCG	Meet with RBGG team to prepare for trial and plan witness exams.	0.7	
1/15/2025	JSY	Work on settlement, including revisions to term sheet and multiple conf and emails re same.	3.0	
1/15/2025	JSY	Draft filing re jury questions; emails re same.	1.0	
1/15/2025	JSY	Emails re demonstratives.	0.2	
1/15/2025	JSY	Trial prep including drafting and finalizing JA ROG and Decl.	5.3	
1/15/2025	AHS	Attended meeting with GCG KES DLE MEC JY to discuss pre-trial tasks and assignments.	1.0	
1/15/2025	AHS	Discussed exhibit work with MEC.	0.1	
1/15/2025	AHS	Discussed class member incentive awards and research with JY.	0.2	
1/15/2025	AHS	Researched class member incentive awards.	4.5	
1/15/2025	AHS	Discussed binder for direct exam prep with DLE.	0.1	
1/15/2025	AHS	Reviewed emails with cocounsel and opposing counsel.	0.4	
1/15/2025	AHS	Reviewed trial exhibits for named pl Bernie Jestrabek-Hart.	0.4	
1/15/2025	AHS	Reviewed trial exhibits for named plf Pat Lindstrom.	0.3	
1/15/2025	MEC	Continued research on motion for JMOL.	3.2	
1/15/2025	MEC	Internal check in meeting with tasks.	1.0	
1/15/2025	MEC	Sent list of tasks to team.	0.2	
1/15/2025	MEC	Looked up contact information for attorney lounge reservations point of contact at the court.	0.1	
1/15/2025	MEC	Reviewed half of exhibits prepared for trial for accuracy.	2.2	
1/15/2025	KES	Participate in internal team trial prep meeting.	1.0	
1/15/2025	KES	Draft and efile hearing transcript order form; emails with court reporter and team re same; arrange for payment re same; review and circulate transcript re same.	1.2	
1/15/2025	KES	Review minute entry and calendar deadlines re same.	0.3	
1/15/2025	KES	Limited overview of hard copy of trial exhibits prepared for quality control; confer MEC re issues to look for in review; email team re standing order re flash drive of exhibits for court.	1.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/15/2025	KES	Email to trial team re pretrial courtroom visit and tech issues; review calendar re same.	0.2	
1/15/2025	KES	Westlaw background research re planned trial witnesses.	0.5	
1/15/2025	KES	Confer team re witness scheduling.	0.2	
1/15/2025	KES	Confer office staff and IT re potential set up and logistics for trial following recommendations by Judge Gilliam Courtroom Clerk.	0.7	
1/15/2025	DLE	Make changes to content of trial exhibit binders and confer with discovery vendor re same.	0.4	
1/15/2025	DLE	Attend and note-take internal team meeting re trial prep.	1.0	
1/15/2025	DLE	Finalize notes from team meeting and circulate same.	0.3	
1/15/2025	DLE	Work on compiling plaintiff trial binders; confer with AHS re which exhibits to include.	1.1	
1/15/2025	DLE	Work with KES on compiling exhibits to produce to the court via flash drive.	1.5	
1/16/2025	GCG	Emails JSY re settlement revision and communications with defendants.	0.3	
1/16/2025	GCG	Review settlement agreement.	0.2	
1/16/2025	GCG	Meet with GW, MJ, BU and JSY to plan meeting with defendants re injunctive relief.	0.5	
1/16/2025	GCG	Meet with TG, ER and KL and co-counsel re injunctive relief term sheet.	2.3	
1/16/2025	GCG	Debrief with co-counsel.	0.3	
1/16/2025	GCG	Participate in settlement conference with MJ Spero and defendants.	4.1	
1/16/2025	GCG	Follow up conference with co-counsel re next steps and trial postponement.	0.3	
1/16/2025	GCG	Emails clients, witnesses and experts re trial postponement.	0.6	
1/16/2025	GCG	Meet with RBGG trial team re trial postponement and next steps.	0.4	
1/16/2025	JSY	Settlement meetings and conference and multiple emails re same; edit draft term sheet.	9.3	
1/16/2025	MWB	Telephone conference with GCG re trial preparation and settlement negotiations.	0.2	
1/16/2025	AHS	Reviewed additional trial exhibits and other relevant case materials for named plf Bernie Jestrabek-Hart.	0.5	
1/16/2025	AHS	Review supplement pleading re Jeanette Algarme.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1171

SERVICES

Date	Person	Description of Services	Hours	Discount
1/16/2025	AHS	Reviewed emails with cocounsel and materials in file re: demonstratives.	0.5	
1/16/2025	AHS	Compiled materials and took notes regarding plaintiff's witness CA.	2.2	
1/16/2025	AHS	Met with JY GCG KS MEC DLE to discuss settlement conference.	0.3	
1/16/2025	AHS	Reviewed sample direct exam outlines.	1.3	
1/16/2025	AHS	Reviewed settlement term sheet and related notes.	2.0	
1/16/2025	MEC	Completed review of trial stamped exhibits.	2.2	
1/16/2025	MEC	Began review of BN documents to prep for direct exam drafting and began drafting direct exam.	3.6	
1/16/2025	MEC	Drafted cover letter for exhibit flash drive, also spoke with KS and DLE to confirm format of letter.	0.6	
1/16/2025	MEC	Settlement debrief with team.	0.4	
1/16/2025	KES	Calendar during trial deadlines for demonstrative exchanges.	0.4	
1/16/2025	KES	Prepare manual filings of flash drives in connection with Algarme declaration; arrange for submission to court.	0.8	
1/16/2025	KES	Review MEC notes re potential exhibit issues; review exhibits re same; confer DLE and review T. Close emails re same.	1.3	
1/16/2025	KES	Review DLE summary of witness background issues.	0.1	
1/16/2025	KES	Emails with second court reporter service re additional original transcripts for trial and review witness and depo designations re same.	1.3	
1/16/2025	KES	Test trial exhibit and presentation uploads in Sharefile as part of initial witness examination prep.	1.2	
1/16/2025	KES	Further trial logistics considerations.	0.3	
1/16/2025	KES	Review emails re trial postponement and confer team re same.	0.5	
1/16/2025	KES	Emails to vendors to stop work.	0.2	
1/16/2025	DLE	Save and circulate filed pleading.	0.1	
1/16/2025	DLE	Review people map reports of witnesses; summarize and send to KES.	0.4	
1/16/2025	DLE	Work of compiling trial prep binders for two plaintiffs; confer with AHS to decide which exhibits to include.	1.7	
1/16/2025	DLE	Work on compiling exhibits for production to the court via flash drive with KES; pose questions to team via email re same.	1.3	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/17/2025	GCG	Review court order re-setting trial.	0.1	
1/17/2025	GCG	Email JSY-ER re stipulation re mootness and due process.	0.1	
1/17/2025	GCG	Conf with KES and emails RBGG team re trial postponement and communications with experts, clients and witnesses.	0.2	
1/17/2025	GCG	Emails clients and experts re new trial date.	0.2	
1/17/2025	GCG	Email JSY-KES re injunctive relief examples agreement.	0.1	
1/17/2025	GCG	Email from TG re settlement agreement.	0.1	
1/17/2025	JSY	Emails re trial postponement.	0.2	
1/17/2025	JSY	Emails re settlement.	0.1	
1/17/2025	JSY	Edit stip re MSJ rulings; email re same.	0.2	
1/17/2025	JSY	Emails re outreach to witnesses re trial postponement.	0.1	
1/17/2025	JSY	Prepare memo re co counsel agreement; emails re same.	0.6	
1/17/2025	JSY	Emails and calls re notifying witnesses re trial delay.	0.2	
1/17/2025	AHS	Discussed term sheet and wind down of trial prep work with DLE.	0.8	
1/17/2025	AHS	Prepared summary of case and status for internal meeting.	0.9	
1/17/2025	AHS	Call with named plaintiff Bernie Jestrabek-Hart to discuss status of settlement and trial postponement and circulated notes.	0.3	
1/17/2025	MEC	Coordinated and called subpoenaed witnesses.	0.3	
1/17/2025	KES	Organize and clean up trial prep materials in light of postponement.	2.0	
1/17/2025	KES	Update calendar.	0.2	
1/17/2025	KES	Email MEC re client contact.	0.1	
1/17/2025	KES	Gather documents for GCG in connection with settlement proposal.	0.4	
1/17/2025	DLE	Discuss settlement term sheet and wind down of trial with AHS.	0.8	
1/17/2025	DLE	Save and circulate filed pleadings; calendar new trial dates per recent orders.	0.2	
1/20/2025	GCG	Conf with JSY and text JSY-JA re trial issues.	0.1	
1/21/2025	JSY	Calls from and to BL re Brookhurst.	0.1	
1/21/2025	KES	Follow up re payment of transportation invoice related to trial prep demonstrative.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
1/22/2025	GCG	Draft email to GW re next steps towards settlement.	0.1	
1/22/2025	KES	Review and circulate transcript notice.	0.1	
1/22/2025	KES	Follow up re payment of depo invoices.	0.2	
1/23/2025	GCG	Confs with GW and JSY and emails TG re settlement agreement preparation and plan for meeting with Judge Spero.	0.3	
1/23/2025	GCG	Revise memos to file re settlement process.	0.3	
1/23/2025	JSY	Call and emails with BL re Brookhurst issues.	0.2	
1/24/2025	GCG	Draft and revise injunction.	0.6	
1/24/2025	GCG	Conf with and email MEC re write up of case status.	0.1	
1/24/2025	KES	TC Veritext re outstanding video depo invoices; emails with team and co-counsel re same.	0.4	
1/25/2025	GCG	Email MC-CW re updates to website.	0.1	
1/26/2025	GCG	Review and revise draft injunction.	0.2	
1/27/2025	GCG	Conf with JSY re stipulated injunction revisions.	0.1	
1/27/2025	GCG	Emails Judge Spero and counsel re postponing statements.	0.1	
1/27/2025	GCG	Email from TG re settlement term sheet.	0.1	
1/27/2025	GCG	Emails with GW re settlement statement.	0.1	
1/27/2025	JSY	Conf. w/ GCG re finalizing injunction.	0.2	
1/27/2025	JSY	Emails re settlement conference statement.	0.1	
1/27/2025	JSY	Edit stipulated injunction; emails re same.	0.6	
1/27/2025	JSY	(Billing Judgment) Emails re connection to Justice in Aging.	0.0	0.1
1/27/2025	DLE	Update case citations on GCG resume.	0.2	
1/28/2025	GCG	Conf with JSY and email GW-JSY re draft injunction.	0.2	
1/28/2025	JSY	(Billing Judgment) Emails re connections with Justice in Aging.	0.0	0.1
1/28/2025	JSY	Conf. w/ GCG re stipulated injunction draft.	0.1	
1/28/2025	JSY	Conf. w/ GCG re stipulated injunction; finalize same and email to co counsel.	0.3	
1/28/2025	KES	Review and circulate court notice and calendar trial dates.	0.2	
1/29/2025	GCG	Emails MJ-GW re revisions to injunction.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
1/29/2025	GCG	Conf with MEC re call from class members at SV family member.	0.1	
1/29/2025	JSY	Emails re meeting re stipulated injunction.	0.1	
1/29/2025	MEC	Summarized voicemail from SV resident in email for team.	0.4	
1/29/2025	MEC	Conversation with GCG re calling back Brookdale SV contact.	0.2	
1/30/2025	GCG	Prepare for and conduct meeting with GW, MJ, BU and JSY to discuss settlement statement and draft injunction.	0.9	
1/30/2025	GCG	Review and revise settlement statement.	0.3	
1/30/2025	GCG	Confs with JSY and emails GW-team re revisions to injunction and settlement statement.	0.4	
1/30/2025	JSY	Meeting with GCG, GBW, MTJ, BU re stipulated injunction and settlement conference brief.	0.9	
1/30/2025	JSY	Two conf. w/ GCG re stipulated injunction.	0.2	
1/30/2025	JSY	Conf. w/ BJH re settlement.	0.2	
1/30/2025	JSY	Edit stipulated injunction; emails re same.	1.4	
1/30/2025	JSY	Review and edit settlement conference brief.	0.5	
1/30/2025	JSY	Conf. and emails re settlement conference brief.	0.2	
1/31/2025	GCG	Review TG and JSY revisions to term sheet.	0.2	
1/31/2025	GCG	Meet with BU, GW, MJ and JSY to revise term sheet.	0.6	
1/31/2025	GCG	Review GW email to Judge Spero re Brookhurst issue.	0.2	
1/31/2025	GCG	Conf with JSY re settlement strategy.	0.2	
1/31/2025	JSY	Meeting re edits to term sheet.	0.8	
1/31/2025	JSY	Three conf. w/ GCG re injunctive relief issues and settlement conference.	0.4	
1/31/2025	JSY	Emails re communication to JS.	0.1	
1/31/2025	JSY	Edit term sheet; multiple emails re same.	1.1	
2/2/2025	GCG	Review TG emails and changes to term sheet.	0.3	
2/2/2025	GCG	Emails GW-JSY-TG re settlement issues.	0.3	
2/2/2025	GCG	Research and draft email to named plaintiffs re settlement issues.	0.3	
2/2/2025	GCG	Emails JSY-team re same.	0.2	
2/2/2025	GCG	Review and revise GW letter re settlement.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/2/2025	JSY	Conf. w/ GCG re term sheet issues.	0.2	
2/2/2025	JSY	Emails re issues with term sheet.	0.3	
2/3/2025	GCG	Prepare for and conduct settlement meeting with TG, ER and KL.	1.0	
2/3/2025	GCG	Follow up meeting with GW, MJ, BU and JSY re settlement issue.	0.4	
2/3/2025	GCG	Confs with GW re Brookhurst settlement issue.	0.5	
2/3/2025	GCG	Confs with JSY and emails JSY-team re revisions to term sheet.	0.3	
2/3/2025	GCG	Research re transfer of venue.	0.2	
2/3/2025	JSY	Conf. w/ GCG re issues with term sheet.	0.1	
2/3/2025	JSY	Meetings re term sheet (with and without Defs).	0.6	
2/3/2025	JSY	Review and edit term sheet; multiple emails and conf. re same.	1.5	
2/4/2025	GCG	Participate in settlement conference with MJ Spero and defendants.	7.7	
2/4/2025	GCG	Follow up conf, emails and texts with JSY re same.	0.4	
2/4/2025	JSY	Conf and emails with GCG and MEC re research re settlement.	0.4	
2/4/2025	JSY	Prepare for and attend MSC; conf. and emails after MSC re next steps for settlement.	9.0	
2/4/2025	JSY	Emails re settlement and next steps.	0.2	
2/4/2025	MEC	Research re: settlement issues.	4.1	
2/4/2025	KES	Organize various settlement related documents.	0.3	
2/5/2025	GCG	Review emails re defendants' changes to term sheet.	0.2	
2/5/2025	GCG	Confs with and emails JSY re same and contacting magistrate judge.	0.3	
2/5/2025	GCG	Emails TG-MJ-team re revisions to term sheet.	0.2	
2/5/2025	GCG	Email from Judge Spero.	0.1	
2/5/2025	GCG	Meet with co-counseling team by Zoom to review defendants' changes and revise term sheet further.	1.3	
2/5/2025	GCG	Conf with JSY re settlement issues.	0.1	
2/5/2025	GCG	Draft and send communications to clients re settlement.	0.2	
2/5/2025	GCG	Conf with LV re same.	0.3	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1176

SERVICES

Date	Person	Description of Services	Hours	Discount
2/5/2025	JSY	Multiple calls with GCG re issues with term sheet and finalizing settlement.	0.5	
2/5/2025	JSY	Multiple emails re revisions to term sheet; edit same.	1.0	
2/5/2025	JSY	Emails with clients re settlement.	0.4	
2/5/2025	JSY	Conf. w/ AHS and KES re settlement.	0.2	
2/5/2025	JSY	Emails and messages re settlement issues.	0.3	
2/5/2025	JSY	Meeting re term sheet.	1.4	
2/5/2025	JSY	Revise term sheet and email to Defendants.	0.3	
2/5/2025	AHS	Discussed terms of settlement and next steps with JY.	0.2	
2/5/2025	AHS	Discussed settlement with KS.	0.2	
2/5/2025	AHS	Discussed settlement with DLE.	0.2	
2/5/2025	AHS	Discussed settlement with KS.	0.2	
2/5/2025	MEC	Reviewed/read settlement term sheet.	0.5	
2/5/2025	DLE	Discuss settlement term sheet with AHS.	0.2	
2/6/2025	GCG	Prepare for and conduct meeting with TG re term sheet.	0.3	
2/6/2025	GCG	(Billing Judgment) Email JSY re death of Seyfarth attorney.	0.0	0.1
2/6/2025	GCG	Text with JA re settlement.	0.1	
2/6/2025	GCG	Gather documents for preliminary approval motion.	0.1	
2/6/2025	JSY	Conf. w/ GCG prior to meeting re term sheet.	0.2	
2/6/2025	JSY	Meeting re term sheet.	0.5	
2/6/2025	JSY	Two conf. w/ GCG re fees negotiations and term sheet.	0.5	
2/6/2025	JSY	Conf. w/ JA re settlement.	0.3	
2/6/2025	JSY	Conf. w/ LAE re settlement and fees issues.	0.3	
2/6/2025	JSY	Emails re stip re status conference; draft and send same.	0.3	
2/6/2025	JSY	Finalize term sheet for execution; multiple emails re same.	0.5	
2/6/2025	AHS	Identified FSP related documents for GCG.	0.1	
2/6/2025	MEC	Reviewed finalized settlement term sheet.	0.2	
2/6/2025	KES	Download, circulate, review and email team re atty withdrawal.	0.2	
2/7/2025	GCG	Emails JSY re draft injunction and fee petition.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1177

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2025	GCG	Review court order setting status conference.	0.1	
2/7/2025	JSY	Finalize and file stip re status conference.	0.3	
2/7/2025	JSY	Prepare stipulated injunction; emails re same.	1.0	
2/7/2025	KES	Review order and calendar status conference.	0.2	
2/10/2025	GCG	Confs with JSY re research re class notice and plan for status conference.	0.4	
2/10/2025	GCG	Emails JSY-GW-team re approach to same.	0.1	
2/10/2025	GCG	Review cases and materials related to Rule 23 notice.	0.1	
2/10/2025	GCG	Review JSY revisions to injunction.	0.1	
2/10/2025	GCG	Review ER inquiry re settlement documentation.	0.1	
2/10/2025	JSY	Conf. w/ GCG re settlement approval issues.	0.3	
2/10/2025	JSY	Conf. w/ GCG re research re notice to class.	0.2	
2/10/2025	JSY	Conf. w/ GCG re settlement approval process and schedule.	0.2	
2/10/2025	JSY	Emails re drafting settlement agreements.	0.2	
2/10/2025	JSY	Research re court approval process and notice issues; emails re same.	2.4	
2/10/2025	JSY	Conf. w/ GCG re settlement approval issues.	0.1	
2/11/2025	GCG	Conferences with JSY and emails GW-team re notice requirements and settlement agreements.	0.5	
2/11/2025	GCG	Review ER communications re same.	0.2	
2/11/2025	GCG	Zoom meeting with co-counsel to prepare for CMC and discuss overall plan for settlement.	0.5	
2/11/2025	GCG	Participate in CMC with Judge Gilliam.	0.9	
2/11/2025	JSY	Internal meeting to prep for CMC.	0.5	
2/11/2025	JSY	Attend CMC.	0.9	
2/11/2025	JSY	Multiple conf. w/ GCG re settlement issues and prep for CMC.	0.3	
2/11/2025	JSY	Meeting with GBW, MTJ, BU after CMC.	0.3	
2/11/2025	JSY	Multiple emails re preliminary approval schedule and class notice issues.	0.5	
2/11/2025	JSY	Meeting with GCG re preliminary approval and settlement issues.	0.4	
2/11/2025	JSY	Multiple emails re preliminary approval process and status conference.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/11/2025	JSY	Review sample motions for preliminary approval and research class notice issue.	0.4	
2/11/2025	AHS	Emailed team sample motion for preliminary approval of CD.	0.6	
2/11/2025	MEC	Reviewed notes from CMC circulated by JSY.	0.2	
2/11/2025	MEC	Reviewed preliminary approval filings in other cases to prep for mot for preliminary approval.	0.4	
2/11/2025	KES	Review JY email re CMC and calendar dates re same.	0.2	
2/12/2025	EG	Consulting with GCG and JSY re class notice in Brookdale.	0.4	
2/12/2025	GCG	Conf with JSY and emails GW-team re motion for preliminary approval.	0.2	
2/12/2025	GCG	Meet via Zoom with JSY and MEC to plan motion and declarations.	0.6	
2/12/2025	GCG	Conf with EG and emails EG-JSY re attorneys fees notice and preliminary approval.	0.2	
2/12/2025	JSY	Conf. w/ GCG re class notice issue.	0.1	
2/12/2025	JSY	Meeting with GCG and MEC re preliminary approval motion.	0.6	
2/12/2025	JSY	Conf. w/ EG re class notice issue; emails re same.	0.3	
2/12/2025	JSY	Revise injunction; email to Defendants.	0.2	
2/12/2025	JSY	Multiple emails re preliminary approval motion and related issues; research re same.	0.6	
2/12/2025	JSY	Research re preliminary approval issues; emails re same.	0.3	
2/12/2025	MEC	Meeting with GCG and JSY re drafting mot for prelim approval.	0.6	
2/12/2025	KES	Review and gather preliminary approval pleadings from similar case in Northern District.	0.6	
2/12/2025	DLE	Save and circulate filed pleading.	0.1	
2/13/2025	GCG	Initial review of defendants' long form settlement agreement.	0.1	
2/13/2025	GCG	Conf with JSY and emails GW-team re same.	0.3	
2/13/2025	GCG	Email JSY and MEC re expert declarations for preliminary approval.	0.1	
2/13/2025	JSY	Emails and conf. re settlement agreement issues.	0.3	
2/13/2025	JSY	Review draft settlement agreements; emails re same.	0.4	
2/13/2025	KES	Review and circulate clerk's notice.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/14/2025	GCG	Prepare for conduct meeting with GW, MJ, BU and JSY to discuss long form settlement agreements.	1.0	
2/14/2025	GCG	Emails JSY-team re revisions to same and client communications.	0.3	
2/14/2025	GCG	Conf with and email MEC re motion for preliminary approval.	0.1	
2/14/2025	JSY	Conf. w/ GCG re issues with settlement documents.	0.1	
2/14/2025	JSY	Meeting with GCG, GBW, MTJ, BU re settlement agreement issues.	1.0	
2/14/2025	JSY	Emails with Defs re settlement agreement.	0.1	
2/14/2025	JSY	Review and edit both draft settlement agreements; emails re same.	2.3	
2/14/2025	AHS	Identified and sent GCG research re prior settlement agreements.	0.3	
2/14/2025	MEC	Research and familiarizing myself with background materials re mot for preliminary approval.	3.2	
2/17/2025	GCG	Review and analyze JSY revisions to long form agreements.	0.2	
2/17/2025	GCG	Emails co-counsel re same.	0.2	
2/17/2025	JSY	Emails re meeting re long form settlement agreement.	0.1	
2/18/2025	GCG	Review GW and JSY revisions to draft settlement agreement.	0.2	
2/18/2025	GCG	Meet with co-counseling team to discuss settlement strategy.	0.7	
2/18/2025	GCG	Follow up conf and email with JSY re same.	0.2	
2/18/2025	JSY	Conf. w/ GCG re issues with long form settlement agreements.	0.1	
2/18/2025	JSY	Emails re long form settlement agreement and scheduling meeting to discuss.	0.4	
2/18/2025	JSY	Meeting internally re long form agreements.	0.9	
2/18/2025	JSY	Further edits to long form agreements; emails re same.	0.4	
2/19/2025	GCG	Prepare for and conduct meeting with TG, ER and co-counsel team re revisions to long form agreements.	1.2	
2/19/2025	GCG	Review long form agreements.	0.3	
2/19/2025	GCG	Meeting with co-counsel team to discuss long form agreements and motion for preliminary approval.	0.5	
2/19/2025	GCG	Review MEC research re preliminary approval.	0.1	
2/19/2025	GCG	Conf with JY re same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/19/2025	JSY	Meeting with Defs re settlement agreement.	1.1	
2/19/2025	JSY	Conf. w/ GCG re meeting re settlement agreement.	0.1	
2/19/2025	JSY	Conf. w/ JA re settlement.	0.2	
2/19/2025	JSY	Conf. w/ MEC re time to meet re motion for preliminary approval.	0.1	
2/19/2025	JSY	Conf. w/ MEC re motion for preliminary approval and class notice issue.	0.3	
2/19/2025	JSY	Review settlement agreements; emails re same.	0.2	
2/19/2025	JSY	Internal meeting re settlement agreement.	0.5	
2/19/2025	JSY	Conf. w/ GCG re settlement issues.	0.1	
2/19/2025	JSY	Conf. w/ LAE re settlement status.	0.1	
2/19/2025	JSY	Edit settlement agreement; multiple emails re same.	1.2	
2/19/2025	LK	(Billing Judgment) Call with MEC to consult on questions re settlement approval motion.	0.0	0.2
2/19/2025	MEC	Research re mot for preliminary approval re class notice.	3.1	
2/19/2025	MEC	Conversation with LK re settlement approval issue.	0.2	
2/19/2025	MEC	Conversation with JSY re mot for preliminary approval.	0.2	
2/19/2025	MEC	Sent notes re attorneys fees notice requirement issue to GCG and JSY.	1.0	
2/19/2025	MEC	Began drafting declarations ISO mot for preliminary approval.	2.3	
2/19/2025	KES	Review depo chart and confirm number of depositions for inclusion in preliminary approval; confer MEC re same.	0.5	
2/20/2025	GCG	Review and revise 2 long form agreements.	0.6	
2/20/2025	GCG	Conf with JSY and emails MJ-team re same.	0.2	
2/20/2025	GCG	Research re settlement issues.	0.1	
2/20/2025	GCG	Conf with KES re preliminary approval motion.	0.1	
2/20/2025	JSY	Conf. w/ GCG re settlement documents.	0.1	
2/20/2025	JSY	Emails re settlement document; research issues re same.	0.4	
2/20/2025	JSY	Conf. w/ MEC re preliminary approval motion.	0.2	
2/20/2025	JSY	Conf. w/ GCG re settlement issues.	0.1	
2/20/2025	JSY	Additional edits to settlement agreements; emails re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2025	MEC	Drafting declaration ISO mot for preliminary approval and drafting motion.	2.9	
2/20/2025	KES	Review and gather information for inclusion in draft preliminary approval.	2.4	
2/21/2025	MEC	Drafting mot for preliminary approval.	1.5	
2/21/2025	KES	Review and gather additional information for draft preliminary approval including expert materials.	0.9	
2/24/2025	GCG	Meet with TG, ER and co-counseling team to discuss issues with long form agreements.	0.6	
2/24/2025	GCG	Debrief meeting with co-counsel re same and re back up plan for class notice.	0.3	
2/24/2025	JSY	Meeting with Defendants re settlement agreements; internal meeting re same.	0.9	
2/24/2025	JSY	Edit draft agreements and draft class notice plan and notice; emails re same.	2.7	
2/24/2025	MEC	Drafting mot for preliminary settlement approval Drafting mot for preliminary settlement approval.	4.1	
2/25/2025	GCG	Review and comment on draft settlement documents.	0.2	
2/25/2025	GCG	Conf with JSY and email GW-MJ re notice and approval strategy.	0.2	
2/25/2025	JSY	Conf. w/ GCG re class notice and settlement agreements; emails re same.	0.2	
2/25/2025	JSY	Emails and conf. re settlement agreement and notice issues.	0.2	
2/25/2025	MEC	Continued drafting mot for preliminary approval.	0.9	
2/25/2025	KES	Email MEC with information in connection with drafting preliminary approval motion.	0.2	
2/26/2025	GCG	Emails TG-GW re check in meeting re settlement issues.	0.1	
2/26/2025	GCG	Confs with JSY and MEC re motion for preliminary approval.	0.2	
2/26/2025	JSY	Edit agreements; emails re same.	0.2	
2/26/2025	MEC	Drafting mot for preliminary approval Drafting mot for preliminary approval.	2.1	
2/26/2025	MEC	Continued drafting mot for preliminary approval.	1.8	
2/27/2025	GCG	Prepare for and conduct meeting with JSY, GW and MJ re class notice plan and long form agreements.	0.4	
2/27/2025	GCG	Emails GW-team re revisions to settlement docs.	0.2	
2/27/2025	JSY	Emails re meeting re settlement docs.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/27/2025	JSY	Conf. and emails re class notice issues.	0.1	
2/27/2025	JSY	Conf. w/ MEC re preliminary approval motion.	0.2	
2/27/2025	JSY	Meeting with GBW, MTJ, GCG re settlement issue and settlement agreements.	0.3	
2/27/2025	JSY	Edit individual agreement and emails re same.	0.2	
2/27/2025	MEC	Drafting mot for preliminary approval--compared working drafting with latest version of settlement agreement and incorporated necessary changes drafting mot for preliminary approval--compared working drafting with latest version of settlement agreement and incorporated necessary changes.	4.1	
2/27/2025	KES	Review documents and provide case history information to MEC in connection with drafting of motion for preliminary approval.	0.3	
2/28/2025	GCG	Confs with JSY re status of long form agreements, zoom meetings with clients, and motion for preliminary approval.	0.2	
2/28/2025	GCG	Email JSY-team re 9th circuit decision on class settlement approval.	0.1	
2/28/2025	JSY	Conf. w/ GCG re motion for preliminary approval and settlement meetings with named plaintiffs.	0.1	
2/28/2025	JSY	Review recent 9th cir case re settlement approval.	0.3	
2/28/2025	JSY	Two conf. w/ MEC, incl. one with AS re preliminary approval motion.	0.5	
2/28/2025	JSY	Emails with plaintiffs re meetings re settlement.	0.2	
2/28/2025	AHS	Met with JY and MEC to discuss motion for preliminary approval.	0.3	
2/28/2025	AHS	Met with MEC to discuss motion for preliminary approval.	0.2	
2/28/2025	MEC	Meeting with JSY and AHS re motion for settlement approval.	0.3	
2/28/2025	MEC	Additional conversation re mot for prelim approval with AHS.	0.2	
2/28/2025	MEC	Drafting mot for preliminary approval.	4.7	
2/28/2025	KES	Review and gather information for MEC in connection with drafting motion for preliminary approval.	0.4	
3/2/2025	GCG	Review JSY-MJ emails re meetings with clients re long form agreement.	0.2	
3/2/2025	JSY	Emails re scheduling meetings with clients.	0.2	
3/3/2025	GCG	Conf with PL and emails team re meeting with named plaintiffs to discuss settlement agreements.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1183

SERVICES

Date	Person	Description of Services	Hours	Discount
3/3/2025	GCG	Review email from TG approving long form agreements.	0.1	
3/3/2025	GCG	Confs with and emails JSY re revisions to motion for preliminary approval.	0.5	
3/3/2025	GCG	Emails MJ re meeting with RS and SS re agreement.	0.1	
3/3/2025	JSY	Conf. w/ GCG re settlement agreement and meetings with clients.	0.2	
3/3/2025	JSY	Emails re scheduling client meetings and finalizing agreement.	0.4	
3/3/2025	JSY	Review and edit motion for preliminary approval.	0.5	
3/3/2025	JSY	Two conf. w/ GCG re motion for preliminary approval.	0.2	
3/3/2025	JSY	Draft and edit motion for preliminary approval.	1.2	
3/3/2025	KC	Coordinate and schedule meetings with 5 clients re confidential settlement.	0.6	
3/3/2025	KC	Coordinate and schedule 4 meetings with clients re confidential settlement.	0.6	
3/3/2025	KC	Set up Zoom meeting with client re confidential settlement and send invite.	0.2	
3/4/2025	GCG	Conf with KES and email JSY re motion for preliminary approval.	0.1	
3/4/2025	GCG	Prepare for client meetings to discuss settlement agreement.	0.1	
3/4/2025	JSY	Conf. w/ KES re motion for preliminary approval.	0.1	
3/4/2025	JSY	Finalize settlement agreements; emails re same.	0.6	
3/4/2025	JSY	Draft and edit motion for preliminary approval.	1.7	
3/4/2025	JSY	Messages and emails re final settlement.	0.2	
3/4/2025	AHS	Emailed with JY and GCG re preliminary approval motion.	0.2	
3/4/2025	KES	Email JY re motion for preliminary approval issues.	0.1	
3/4/2025	KC	Updating contact list.	0.2	
3/5/2025	GCG	Prepare for and conduct meetings with four named plaintiffs regarding long form settlement agreements.	2.2	
3/5/2025	GCG	Draft memo to file re meetings with named plaintiffs.	1.0	
3/5/2025	GCG	Conf with ML re settlement.	0.2	
3/5/2025	GCG	Update memo to file re call.	0.1	
3/5/2025	GCG	Review and revise memoranda re settlement discussions.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/5/2025	GCG	Confs with JSY re same and re drafting motion for preliminary approval.	0.2	
3/5/2025	GCG	Email AS re to do list for case.	0.1	
3/5/2025	JSY	Emails re execution of settlement agreements.	0.1	
3/5/2025	JSY	Meeting with HF, GCG, BU re settlement.	0.5	
3/5/2025	JSY	Conf. w/ GCG re settlement meetings with clients.	0.1	
3/5/2025	JSY	Conf. w/ AHS re proposed order re preliminary approval motion.	0.1	
3/5/2025	JSY	Draft and edit motion for preliminary approval; conf. w/ GCG re same.	3.3	
3/5/2025	JSY	Meeting with ML, GCG, MTJ re settlement.	0.7	
3/5/2025	JSY	Meeting with RC, JC, GCG, MTJ re settlement.	0.4	
3/5/2025	JSY	Meeting with BJH, GCG, MTJ re settlement.	0.8	
3/5/2025	JSY	Two conf. w/ GCG re settlement issues.	0.2	
3/5/2025	JSY	Emails re settlement issues.	0.1	
3/5/2025	AHS	Call w JY re drafting proposed order for preliminary approval.	0.2	
3/5/2025	AHS	Drafted proposed order for preliminary approval.	1.3	
3/6/2025	GCG	Prepare for and meet with three plaintiffs re long form settlement agreement.	1.5	
3/6/2025	GCG	Update memo to file re same.	0.3	
3/6/2025	GCG	Confs with and emails JSY re meetings with clients, motion for preliminary approval and fees negotiations.	0.3	
3/6/2025	GCG	Review and revise motion for preliminary approval.	0.2	
3/6/2025	JSY	Meeting with LV and GCG re settlement.	0.5	
3/6/2025	JSY	Conf. w/ JA and GCG re settlement.	0.5	
3/6/2025	JSY	Draft and edit documents for motion for preliminary approval, including MPA, GCG Decl., GBW Decl; email to co-counsel.	2.2	
3/6/2025	JSY	Meeting with GCG, PL re settlement.	0.5	
3/6/2025	JSY	Conf. w/ GCG re fees negotiation and next steps with settlement process.	0.2	
3/6/2025	JSY	Emails re research re fees and preliminary approval.	0.2	
3/6/2025	AHS	Identified case tasks list and sent to GCG.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2025	AHS	Emailed with JY re: research tasks for motion for final approval.	0.2	
3/7/2025	GCG	Conf with JSY and emails JSY-GW re revisions to motion for preliminary approval and injunction.	0.3	
3/7/2025	JSY	Edit documents re preliminary approval and stipulated injunction.	1.5	
3/7/2025	JSY	Review edits to motion for preliminary approval.	0.1	
3/7/2025	AHS	Updated legal citations in motion for preliminary approval.	0.5	
3/9/2025	JSY	Emails re status.	0.1	
3/10/2025	GCG	Confs with and emails JSY re revisions to settlement agreement and motion for preliminary approval.	0.2	
3/10/2025	GCG	Emails GW-team re same.	0.2	
3/10/2025	JSY	Emails re preliminary approval motion.	0.1	
3/10/2025	JSY	Emails with clients re status.	0.2	
3/10/2025	JSY	Conf. w/ GCG re preliminary approval motion.	0.2	
3/10/2025	JSY	Two conf. w/ GCG re preliminary approval issues.	0.2	
3/10/2025	JSY	Draft and edit motion for preliminary approval; multiple emails with team re same.	3.2	
3/10/2025	JSY	Edit settlement agreement; emails re same and re preliminary approval issues.	0.4	
3/10/2025	JSY	Emails re settlement approval.	0.2	
3/11/2025	GCG	Review and revise motion for preliminary approval.	0.4	
3/11/2025	GCG	Confs with JSY and emails GW-team re same.	0.2	
3/11/2025	JSY	Conf. w/ GCG re preliminary approval motion.	0.2	
3/11/2025	JSY	Conf. w/ JA re settlement.	0.2	
3/11/2025	JSY	Conf. w/ GCG re settlement issues.	0.2	
3/11/2025	JSY	Edit motion for preliminary approval and stipulated injunction; emails re same.	0.5	
3/12/2025	GCG	Review readily achievable regulations and checklist.	0.2	
3/12/2025	GCG	Email with TG re fees settlement and motion for preliminary approval.	0.2	
3/12/2025	GCG	Meet with GW, MJ, BU and JSY to discuss readily achievable aspect of class action settlement.	0.5	
3/12/2025	GCG	Review and revise email to TG re same.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/12/2025	GCG	Review GW email re settlement agreement.	0.1	
3/12/2025	GCG	Conf with JSY re same and re status of three documents.	0.2	
3/12/2025	GCG	Begin revising Grunfeld declaration ISO preliminary approval.	0.3	
3/12/2025	JSY	Conf. multiple times w/ GCG re settlement and preliminary approval issues.	0.3	
3/12/2025	JSY	Emails re settlement agreement and preliminary approval.	0.3	
3/12/2025	JSY	Meeting with GBW, MTJ, GCG, BU re settlement issues.	0.5	
3/12/2025	JSY	Conf. w/ GCG re settlement issues.	0.1	
3/12/2025	JSY	Draft email to Defs re settlement; emails re same.	0.3	
3/12/2025	JSY	Conf. and emails with GCG re finalizing settlements and various settlement issues.	0.3	
3/12/2025	JSY	Edit settlement agreements and injunction; emails re same.	0.3	
3/13/2025	GCG	Review ER and TG revisions to brief and settlement agreement.	0.2	
3/13/2025	GCG	Emails JSY-GW-MJ re same.	0.3	
3/13/2025	GCG	Meet with MJ and BU re same.	0.3	
3/13/2025	GCG	Conf with GW re revision to fee provision.	0.1	
3/13/2025	GCG	Email Judge Spero re same.	0.1	
3/13/2025	GCG	Emails TG-ER re setting up meeting.	0.2	
3/13/2025	GCG	Review and revise draft MPAs in support of preliminary approval.	0.9	
3/13/2025	GCG	Confs with KES re finalizing same.	0.1	
3/13/2025	GCG	Email and text clients re status of agreements.	0.2	
3/13/2025	GCG	Conf with JSY re defendants' edits to brief and settlement agreements.	0.3	
3/13/2025	JSY	Two conf. with GCG re settlement issues and preliminary approval.	0.4	
3/14/2025	GCG	Prepare for and conduct meeting with TG, ER and plaintiffs' team to discuss final issues with settlement agreements and motion for preliminary approval.	0.5	
3/14/2025	GCG	Follow up conferences with GW, MJ, BU and JSY re same.	0.4	
3/14/2025	GCG	Review and revise Grunfeld declaration ISO preliminary approval.	0.9	
3/14/2025	GCG	Conf with MA re JA hospitalization.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/14/2025	GCG	Confs with and emails JSY re motion to seal v. lodging settlement and need to finalize and sign settlement documents.	0.5	
3/14/2025	GCG	Conf with HF re status of settlement.	0.2	
3/14/2025	GCG	Update memo to file re same.	0.2	
3/14/2025	JSY	Meeting with Defs re settlement agreement and preliminary approval motion.	0.6	
3/14/2025	JSY	Conf. w/ MEC two times re sealing issue and motion for preliminary approval.	0.2	
3/14/2025	JSY	Edit preliminary approval documents and settlement documents; multiple emails and conf. re same.	1.7	
3/14/2025	JSY	Finalize and send out settlement agreements for signature.	0.5	
3/14/2025	JSY	Emails re GBW declaration.	0.1	
3/14/2025	JSY	Edit GBW declaration; emails re same.	0.2	
3/14/2025	MEC	Brookdale sealing motion conversation with JSY.	0.3	
3/14/2025	MEC	(Billing Judgment) Research re motions to seal settlement agreement under compelling reasons vs good cause standard.	0.0	1.7
3/14/2025	FGL	Review JSY email re draft Admin Motion to Seal and draft Proposed Order and revise/format same.	0.4	
3/14/2025	KES	Email JY with same admin motions to seal.	0.2	
3/15/2025	GCG	Confs with JSY, JA, and MA, BJH and PL re docusigning agreements.	0.6	
3/15/2025	GCG	Emails MJ-JSY-team re same.	0.4	
3/15/2025	GCG	Review and revise Wallace declaration ISO preliminary approval.	0.3	
3/15/2025	GCG	Email Judge Spero-GW re status.	0.1	
3/15/2025	JSY	Multiple calls with GCG and JA re settlement execution.	0.5	
3/15/2025	JSY	Multiple emails and messages re execution of settlement agreements and meaning of settlements; re-send docusign multiple times.	1.0	
3/16/2025	GCG	Conf with PL, VM and email DM, text TG and emails JSY-team re signatures on agreements.	0.6	
3/16/2025	JSY	Conf. w/ PL re settlement execution.	0.1	
3/16/2025	JSY	Multiple emails and messages re execution of agreements.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/17/2025	GCG	Review and revise Grunfeld Declaration in support of motion for preliminary approval.	0.7	
3/17/2025	GCG	Conf with JSY re same.	0.3	
3/17/2025	GCG	Conf with JSY and email GW-MJ-BU-JSY re transmission of confidential settlement to court.	0.5	
3/17/2025	GCG	Confs with JSY and KES re filing motion for preliminary approval.	0.2	
3/17/2025	GCG	Draft update to Brookdale class action page re preliminary approval motion.	0.3	
3/17/2025	GCG	Conf with and emails CW re same.	0.2	
3/17/2025	GCG	Draft email to MH, AX and SG re settlement.	0.3	
3/17/2025	JSY	Edit and finalize documents re motion for preliminary approval; multiple emails and conf. re same.	4.6	
3/17/2025	MEC	Cite checked mot for preliminary approval.	2.2	
3/17/2025	KES	Review final papers and efile motion for preliminary approval; email proposed order to chambers.	0.7	
3/17/2025	KES	Download and circulate filed motion.	0.2	
3/17/2025	KES	Calendar motion deadlines.	0.1	
3/18/2025	GCG	Confs with and emails JSY re response form courtroom depity to confidential individual settlement agreement.	0.3	
3/18/2025	JSY	Emails and conf. re motion for preliminary approval.	0.3	
3/18/2025	JSY	Prepare stip re in camera review of confidential settlement and multiple emails and conf. re same and re errata re same.	1.4	
3/18/2025	MEC	Handled inquiries from two individuals re status of case.	0.4	
3/18/2025	KES	Review court order vacating trial and update calendar; confer team re same.	0.3	
3/18/2025	KES	Draft, finalize and efile errata for Stipulation and PO re lodging of confidential document.	0.7	
3/18/2025	KES	Review and circulate order re lodging of confidential document.	0.1	
3/19/2025	AHS	Discussed mot for preliminary approval with MEC.	0.2	
3/19/2025	MEC	Reviewed JSY redlines on mot for preliminary approval to prep for meeting to discuss same.	0.5	
3/19/2025	MEC	Meeting with JSY re MPA.	0.5	
3/19/2025	DLE	Save and circulate filed pleadings.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
3/21/2025	KES	Check calendar for any remaining deadlines and remove additional dates tied to vacated trial.	0.1	
3/23/2025	GCG	Email JSY re talking points for named plaintiffs re confidentiality.	0.1	
3/25/2025	GCG	Email MH re settlement.	0.1	
3/25/2025	GCG	Conf with and email JSY re talking points for plaintiffs post settlement.	0.1	
3/25/2025	JSY	Conf. w/ GCG re talking points for clients re settlement.	0.1	
3/25/2025	JSY	Draft talking points re settlement for clients.	0.4	
3/25/2025	JSY	Emails re taking points for clients.	0.1	
3/26/2025	GCG	Conf with JSY re call from JA and need to address successor issues.	0.1	
3/26/2025	JSY	Email talking points to clients.	0.1	
3/26/2025	JSY	Conf. w/ JA re settlement questions.	0.2	
3/26/2025	JSY	Conf. w/ GCG re call with JA.	0.1	
3/26/2025	JSY	Update memo re JA call and emails with co counsel re settlement issue.	0.2	
3/26/2025	JSY	Emails re call with family member of resident.	0.1	
3/27/2025	BBK	Reviewing Pls' Motion for Preliminary Approval of Class Action Settlement.	0.5	
3/28/2025	BBK	Analyzing GCG Decl ISO Motion for Preliminary Approval of Class Settlement and attached class settlement agreement and proposed stipulated injunction.	0.6	
3/28/2025	BBK	Analyzing confidential settlement agreement of named Pls' individual claims.	0.3	
3/31/2025	GCG	Email with KES re trial deadlines.	0.1	
4/14/2025	GCG	Email team re CB transition impact on class.	0.1	
4/14/2025	GCG	Draft motion to allow Zoom appearance at preliminary approval hearing.	0.2	
4/15/2025	GCG	Revise application to appear by Zoom.	0.2	
4/15/2025	GCG	Email co-counsel re same and re communication with defense counsel.	0.2	
4/16/2025	GCG	Email ER-team re request to appear by Zoom at preliminary approval hearing.	0.1	
4/17/2025	GCG	Review pleadings to prepare for oral argument.	0.6	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1190

SERVICES

Date	Person	Description of Services	Hours	Discount
4/17/2025	GCG	Review court order re Zoom appearance.	0.1	
4/17/2025	GCG	Emails KES-JSY-NR re same.	0.1	
4/17/2025	KES	Efile admin motion and send PO.	0.3	
4/17/2025	KES	Review and circulate order granting Zoom appearance and update calendar with Zoom info.	0.3	
4/18/2025	GCG	Emails GW-JSY re preliminary approval oral argument.	0.2	
4/21/2025	GCG	Email JSY and KES re court reporter for hearing.	0.1	
4/21/2025	JSY	Emails re court reporter for prelim approval hearing.	0.1	
4/21/2025	JSY	Re-review preliminary approval papers.	0.1	
4/21/2025	JSY	Emails re court reporter.	0.1	
4/21/2025	JSY	Emails re payment of costs.	0.1	
4/21/2025	KES	Review court calendar, local and standing orders to determine whether court reporter will be present at hearing.	0.3	
4/22/2025	GCG	Confs w/JSY re preparation for oral argument.	0.1	
4/22/2025	JSY	(Reduced Charge) Conf. w/ GCG re prelim. approval hearing.	0.1	0.1
4/22/2025	KES	Emails with team and court clerk re need for court reporter.	0.4	
4/25/2025	JSY	Emails re preliminary approval hearing prep and issues with HSG fees orders.	0.3	
4/25/2025	JSY	Prep for preliminary approval hearing, incl research re notice issues.	1.8	
4/25/2025	BBK	Emails w/ JSY and co-counsel re hearing on preliminary approval for class settlement.	0.1	
4/26/2025	GCG	Review Grunfeld declaration to prepare for hearing.	0.2	
4/28/2025	JSY	Emails re prep for preliminary approval hearing.	0.3	
4/28/2025	BBK	Reviewing emails w/ opposing counsel re status of compliance w/ 6/1 deadlines in settlement agmt.	0.1	
4/29/2025	JSY	Prep for preliminary approval hearing.	0.5	
4/29/2025	KES	Prepare hearing materials for JY.	1.0	
4/30/2025	GCG	Prepare for hearing; conf with JSY re same.	0.2	
4/30/2025	JSY	Meeting with GBW, MTJ, BU re preliminary approval hearing.	0.3	
4/30/2025	JSY	Emails re potential schedule for notice.	0.4	
4/30/2025	JSY	Prep for preliminary approval hearing; research re same; emails re same.	3.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1191

SERVICES

Date	Person	Description of Services	Hours	Discount
4/30/2025	KES	Prepare additional materials for JY hearing prep.	0.2	
4/30/2025	KES	Determine number of units in SV, SR and Brookhurst in preparation for hearing.	0.8	
5/1/2025	GCG	Emails JSY-team re potential schedule for fairness hearing.	0.2	
5/1/2025	GCG	Review settlement agreement, Grunfeld declaration and proposed injunction.	0.8	
5/1/2025	GCG	Participate in hearing on motion for preliminary approval of settlement.	1.1	
5/1/2025	JSY	(Reduced Charge) Travel to and from courthouse for hearing.	0.5	0.5
5/1/2025	JSY	Attend hearing and conf. w/ GBW, ER, TG before and after.	2.0	
5/1/2025	JSY	Emails and conf re hearing and follow up work; research re same.	0.8	
5/1/2025	JSY	Prep for hearing.	0.5	
5/1/2025	BBK	Reviewing JSY report re preliminary approval hearing and next steps.	0.1	
5/1/2025	AHS	Met with JY to discuss preliminary approval hearing and follow-up legal research.	0.2	
5/1/2025	KES	Confer JY re Preliminary Approval hearing and next steps for class notice.	0.2	
5/2/2025	GCG	Emails JSY-GW re follow up to preliminary approval hearing.	0.1	
5/2/2025	JSY	Conf. w/ BBK, MWB, LAE re preliminary approval hearing, class notice, and related issues.	0.5	
5/2/2025	JSY	Emails re meeting re notice.	0.1	
5/2/2025	MWB	Conference with JY re hearing and strategy re settlement and fees issues.	0.2	
5/2/2025	BBK	Phone call w/ JSY re hearing on prelim approval of class settlement and next steps.	0.2	
5/2/2025	BBK	Reviewing minute entry for prelim approval hearing and emails w/ co-counsel re next steps.	0.1	
5/2/2025	KES	Review court order and calendar deadline.	0.1	
5/2/2025	KES	Finalize and efile transcript order form.	0.2	
5/2/2025	KC	Confer with JSY re GCG availability for meeting.	0.1	
5/4/2025	GCG	Email AS re client update.	0.1	
5/5/2025	GCG	Confs with and emails JSY re further briefing on preliminary approval.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/5/2025	GCG	Meet with GW, BU and JSY via Zoom re same.	0.4	
5/5/2025	GCG	Review JSY email to defendants re same.	0.2	
5/5/2025	GCG	Email AS-JSY re legal research re named plaintiff preference.	0.2	
5/5/2025	GCG	Revise letter to named plaintiffs re case updates.	0.3	
5/5/2025	GCG	Confs with JSY and AS re same.	0.1	
5/5/2025	JSY	Meeting re class notice and preferential treatment issue with GBW, GCG, BU.	0.4	
5/5/2025	JSY	(Reduced Charge) Multiple conf. w/ GCG re notice issue and preferential treatment issue.	0.2	0.2
5/5/2025	JSY	Review letter to clients re preliminary approval; emails re same.	0.2	
5/5/2025	JSY	Edit draft notice and draft email re preferential treatment issue; emails re same.	1.0	
5/5/2025	JSY	Emails re research re preferential treatment.	0.1	
5/5/2025	AHS	Drafted letter to plaintiffs updating them on case status.	0.7	
5/5/2025	AHS	Researched and wrote memo for supplemental briefing following preliminary approval hearing.	3.0	
5/6/2025	GCG	Conf with JSY re Judge's issue with settlement.	0.1	
5/6/2025	JSY	Conf. w/ JA and then GCG re JA settlement questions.	0.2	
5/6/2025	JSY	Conf. w/ GCG re supplemental brief.	0.1	
5/6/2025	JSY	Review memo re preferential treatment; emails and conf. re same.	0.2	
5/6/2025	KES	Review, revise and send case update letters to clients.	0.6	
5/7/2025	JSY	Emails re preferential treatment research.	0.1	
5/7/2025	AHS	Emailed JY re research for preliminary approval.	0.2	
5/7/2025	AHS	Legal research for supplementing briefing re preliminary approval of PI.	2.9	
5/8/2025	JSY	Review updated memo re preferential treatment; emails re same.	0.3	
5/8/2025	AHS	Drafted update re settlement approval for website.	0.2	
5/8/2025	AHS	Conducted additional research and updated memo for supplemental briefing re: preliminary approval of settlement.	3.2	
5/9/2025	GCG	Conf with and email JSY re supplemental briefing.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
5/9/2025	GCG	(Billing Judgment) Email from ER re change of firms and update contacts re same.	0.0	0.1
5/9/2025	JSY	Conf. w/ GCG re supplemental brief re preferential treatment.	0.1	
5/9/2025	JSY	Emails re supplemental brief re preferential treatment.	0.2	
5/9/2025	KES	Follow up with court reporter re transcript status.	0.2	
5/12/2025	JSY	Conf. w/ AHS re supplemental brief re preferential treatment.	0.3	
5/12/2025	JSY	Emails re time to meet with Defs re draft notice.	0.1	
5/12/2025	JSY	Review memo re preferential treatment; emails re same.	0.1	
5/12/2025	JSY	Emails re meeting re draft notice; review Defs' redlines to same.	0.2	
5/12/2025	AHS	Call with JY re supplemental brief for preliminary approval.	0.3	
5/12/2025	AHS	Reviewed legal research memo and outlined supplemental brief for preliminary approval.	0.4	
5/12/2025	KES	(Billing Judgment) Review emails with court reporter and prepare fedex label for payment.	0.0	0.2
5/13/2025	GCG	Conf with JSY re defendants' notice plan.	0.1	
5/13/2025	GCG	Email with GW re same.	0.1	
5/13/2025	GCG	Review and analyze notice plan in light of relevant case law.	0.3	
5/13/2025	JSY	Emails re meeting to discuss draft notice.	0.2	
5/13/2025	JSY	(Reduced Charge) Two conf. w/ GCG re draft notice revisions and issues with fees motion.	0.2	0.1
5/13/2025	AHS	Drafted supplemental brief in support of plaintiffs' motion for preliminary approval.	0.3	
5/13/2025	FGL	(Billing Judgment) Review KES email re opposing counsel's new firm and run supplemental conflicts check re same.	0.0	0.2
5/13/2025	KES	(Billing Judgment) Review address change and update contact list.	0.0	0.1
5/13/2025	KES	Confirm status of case in connection with preliminary approval.	0.1	
5/14/2025	GCG	Conf with and email JSY re notice issues.	0.2	
5/14/2025	JSY	Conf. w/ GCG re draft notice issue.	0.1	
5/14/2025	JSY	Review transcript of preliminary approval hearing.	0.1	
5/14/2025	JSY	(Reduced Charge) Conf. w/ AHS re supplemental brief.	0.1	0.1

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1194

SERVICES

Date	Person	Description of Services	Hours	Discount
5/14/2025	JSY	Edit draft supplemental filing re preferential treatment; emails re same.	1.1	
5/14/2025	BBK	Reviewing transcript of 5/1 preliminary approval hearing.	0.1	
5/14/2025	AHS	Reviewed notes from hearing on preliminary approval.	0.3	
5/14/2025	AHS	Drafted supplemental motion in support of preliminary approval.	3.5	
5/14/2025	AHS	Discussed supplemental joint filing with JY.	0.1	
5/14/2025	KES	Review and circulate May 1 transcript.	0.1	
5/15/2025	GCG	Review and revise brief re preferential treatment issue.	0.4	
5/15/2025	GCG	Meet with GW, MJ, BU and JSY re notice issues.	0.5	
5/15/2025	GCG	Review and comment on JSY revised notice plan.	0.2	
5/15/2025	GCG	Emails GW-team re same.	0.2	
5/15/2025	JSY	Meeting with GBW, MTJ, BU, GCG to discuss notice plan.	0.5	
5/15/2025	JSY	Additional edits to suppl. brief re preferential treatment; emails and conf. re same.	0.7	
5/15/2025	JSY	Revise class notices; emails re same.	1.0	
5/15/2025	AHS	Revised supplemental brief in support of preliminary approval.	2.3	
5/16/2025	GCG	Participate in meet and confer with defendants counsel and co-counsel re notice plan and supplemental briefing.	0.7	
5/16/2025	GCG	Follow up Zoom with GW, MJ, BU and JSY re same.	0.3	
5/16/2025	GCG	Review and comment on JSY email to defendants re same.	0.2	
5/16/2025	JSY	Meeting with Defs re notice plan and preferential treatment brief.	0.5	
5/16/2025	JSY	Meeting with internal team re notice plan issues.	0.6	
5/16/2025	JSY	Conf. w/ GCG re notice issues.	0.2	
5/16/2025	JSY	Draft email to Defs re notice issues; emails re same.	0.5	
5/18/2025	GCG	Emails GW and JSY re response to TG email.	0.2	
5/18/2025	GCG	Email TG re class notice plan.	0.1	
5/18/2025	JSY	Emails re response to Defs re notice.	0.1	
5/19/2025	GCG	Draft responses to TG proposal for extension.	0.2	
5/19/2025	GCG	Conf with JSY and emails GW-team re same.	0.2	
5/19/2025	GCG	Revise draft stipulation.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
5/19/2025	GCG	Conf with JSY and emails TG re tenure of BJH and SS.	0.2	
5/19/2025	GCG	Conf with JSY re notice plan research.	0.1	
5/19/2025	GCG	Review JSY legal research re Rule 23 requirements and conf. re same.	0.1	
5/19/2025	JSY	Conf. w/ GCG re preferential treatment issue.	0.1	
5/19/2025	JSY	Conf. w/ GCG re notice issues.	0.4	
5/19/2025	JSY	Research notice issues; draft memo re same; emails re same.	1.4	
5/19/2025	JSY	Emails with Defs re tenure of SS and BJH.	0.2	
5/19/2025	BBK	Reviewing stip re EOT for filing re: class notice process and emails re same.	0.1	
5/19/2025	KES	Review and circulate stip, order re EOT and calendar new deadline re notice process.	0.3	
5/20/2025	GCG	Confs with MWB and JSY and email GW re notice plan.	0.2	
5/20/2025	GCG	Emails JSY-TG and AS re preliminary approval follow up.	0.2	
5/20/2025	JSY	Two conf. w/ GCG re notice issues and next steps.	0.2	
5/20/2025	JSY	Edit preliminary approval supp. brief; emails re same.	0.7	
5/20/2025	JSY	Emails re notice issues.	0.1	
5/20/2025	JSY	Edit GCG Decl; emails re same.	0.2	
5/20/2025	AHS	Edited supplementary motion in support of preliminary approval and drafted GCG declaration in support thereof.	0.8	
5/21/2025	GCG	Conf with and emails JSY re defendants' agreement to give notice to responsible parties and notice plan.	0.5	
5/21/2025	GCG	Research re defendants' assessment process and subclass definition.	0.5	
5/21/2025	GCG	Review and revise draft notice plans.	0.5	
5/21/2025	GCG	Draft email to co-counsel re next steps in notice process.	0.3	
5/21/2025	GCG	Review and revise brief re preliminary approval.	0.3	
5/21/2025	GCG	Review and approve Grunfeld declaration re supplemental brief.	0.2	
5/21/2025	GCG	Email AS-team re filing of same.	0.1	
5/21/2025	GCG	Conf with GW re notice plan issues.	0.2	
5/21/2025	JSY	Emails re notice issues.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/21/2025	JSY	Conf. w/ GCG re notice issues.	0.1	
5/21/2025	JSY	Emails re preferential treatment brief.	0.2	
5/21/2025	JSY	Emails re notice schedule.	0.1	
5/21/2025	JSY	Multiple conf. w/ GCG re notice issues.	0.2	
5/21/2025	JSY	Revise supplemental brief re preferential treatment.	0.2	
5/21/2025	JSY	Revise class notice documents; multiple emails re same.	0.8	
5/21/2025	BBK	Reviewing emails w/ co-counsel re class notice procedure.	0.1	
5/21/2025	AHS	Revised Grunfeld Declaration in support of plfs' supplemental filing in support of preliminary approval and emailed team re same.	0.7	
5/21/2025	KES	Review assessment form documents in connection with notice negotiations; tc and email GCG re same.	0.4	
5/22/2025	GCG	Oversee e-filing of supplemental brief and declaration in support of motion for preliminary approval.	0.1	
5/22/2025	GCG	Confs with and emails JSY re supplemental brief and notice plan negotiations.	0.4	
5/22/2025	GCG	Emails GW-team re notice plan issues.	0.1	
5/22/2025	GCG	Email AS re class member call.	0.1	
5/22/2025	JSY	Three conf. w/ GCG re notice and supplemental brief.	0.3	
5/22/2025	JSY	Edit supplemental brief; multiple emails re same; finalize and file same.	0.5	
5/22/2025	JSY	Emails re inquiry from resident.	0.1	
5/22/2025	JSY	Emails re issue with cost.	0.1	
5/22/2025	JSY	Emails re notice issues.	0.2	
5/22/2025	BBK	Reviewing Supp Brief ISO Motion for Preliminary Approval of Class Settlement.	0.1	
5/22/2025	KES	Review final documents and efile supplemental brief re settlement; circulate filed copies of same.	0.4	
5/23/2025	GCG	Conf with JSY re notice plan.	0.2	
5/23/2025	GCG	Emails GW and TG re same.	0.1	
5/23/2025	JSY	Conf. w/ GCG re notice issues and next steps for preliminary approval and fees motion.	0.2	
5/23/2025	BBK	(Billing Judgment) Reviewing AS report re intake/decline of Brookdale resident.	0.0	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
5/23/2025	AHS	Called back resident/class member, recommended next steps, emailed team re same.	0.4	
5/25/2025	GCG	Email with GW re class notice.	0.1	
5/26/2025	GCG	Conf with GW re notice plan.	0.2	
5/26/2025	GCG	Revise and send notice plan and cover email to GW, MJ, BU, JSY, TG and ER.	0.3	
5/26/2025	GCG	Email GW-BU re Flores assessment of visual acuity.	0.1	
5/26/2025	JSY	Emails re response to Defs re notice.	0.1	
5/27/2025	GCG	Review TG email re notice plan.	0.1	
5/27/2025	GCG	Meet via Zoom with GW, MJ, BU and JSY re approach to same.	0.5	
5/27/2025	GCG	Review and revise notice plan.	0.3	
5/27/2025	GCG	Draft email to TG re same.	0.3	
5/27/2025	GCG	Confs with GW and JSY re notice issues.	0.5	
5/27/2025	JSY	Conf. w/ GCG re notice.	0.1	
5/27/2025	JSY	Emails re notice issues; research same.	0.2	
5/27/2025	JSY	Meeting with internal team re class notice.	0.5	
5/27/2025	JSY	Multiple conf. w/ GCG re notice plan issues.	0.3	
5/27/2025	JSY	Edit draft notices and prepare cover pleading for notice plan; emails re same.	1.0	
5/27/2025	BBK	Reviewing emails w/ co-counsel re negotiations w/ Ds over notice process.	0.1	
5/28/2025	GCG	Research response to TG email re visual disabilities.	0.2	
5/28/2025	GCG	Confs with JSY and emails GW-MJ-BU re same and re draft notice cover pleading.	0.3	
5/28/2025	GCG	Emails TG and ER re notice plan.	0.2	
5/28/2025	GCG	Revise notice plan pleading.	0.5	
5/28/2025	JSY	Conf. w/ GCG re notice plan.	0.1	
5/28/2025	JSY	Emails re notice plan issues.	0.2	
5/28/2025	JSY	Draft pleading re notice plan; emails re same.	1.2	
5/28/2025	JSY	Conf. w/ GCG re notice plan pleading.	0.1	
5/28/2025	JSY	Emails re notice pleading.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
5/28/2025	JSY	Emails re notice issues.	0.2	
5/29/2025	GCG	Review and revise pleading re notice plan.	0.5	
5/29/2025	GCG	Confs with JSY and emails GW-MJ-BU-JSY-ER-GW re finalizing notice pleading.	0.5	
5/29/2025	JSY	Several conf. w/ GCG re notice plan issues and filing.	0.4	
5/29/2025	JSY	Conf. w/ KES re filing notice plan.	0.1	
5/29/2025	JSY	Edit notice plan documents and prepare for filing; multiple emails re same.	1.0	
5/29/2025	KES	Review, finalize and efile joint notice plan.	0.4	
5/30/2025	GCG	Review TC urgent email re vision disabilities.	0.1	
5/30/2025	GCG	Conf with JSY re same and re plan for review of Brookhurst plans.	0.3	
5/30/2025	GCG	Meet by Zoom with GW, MJ, BU and JSY re same.	0.4	
5/30/2025	GCG	Research and draft email to TG proposed neutral experts and responding to vision concerns.	0.2	
5/30/2025	GCG	Review TG response.	0.1	
5/30/2025	JSY	Conf. w/ GCG re vision notice issue.	0.1	
5/30/2025	JSY	Conf. w/ GCG re issues with vision barriers.	0.3	
5/30/2025	JSY	Meeting with GCG, GBW, MTJ, BU re notice issue and CASp.	0.3	
5/30/2025	JSY	Analyze vision barriers re notice issue; emails re same.	0.6	
5/30/2025	JSY	Analyze settlement agreement re CASp; emails re same.	0.1	
5/30/2025	JSY	Emails re Brookhurst plans; review same.	0.2	
5/30/2025	JSY	Emails re notice issue.	0.1	
5/30/2025	BBK	Reviewing parties' joint proposal for class notice filed on 5/29.	0.2	
5/30/2025	BBK	Reviewing GCG email to opposing counsel re settlement implementation.	0.1	
5/30/2025	AHS	Called resident back and provided referrals via email.	0.4	
5/30/2025	KES	Download and organize settlement related documents from Defs.	0.2	
6/2/2025	GCG	Review email from ER re neutral expert proposals.	0.1	
6/2/2025	GCG	Research SM.	0.1	
6/2/2025	GCG	Conf with JSY and emails GW re same.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
6/2/2025	GCG	Email KES re deadline to object to plans.	0.1	
6/2/2025	GCG	Conf with JSY re call with JA.	0.1	
6/2/2025	JSY	Conf. w/ JA re status of settlement.	0.2	
6/2/2025	JSY	Conf. w/ GCG re notice issues.	0.1	
6/2/2025	JSY	Emails re CASp.	0.1	
6/2/2025	JSY	Conf. w/ GCG re CASp.	0.1	
6/2/2025	JSY	Emails re CASp selection.	0.1	
6/2/2025	AHS	Reviewed updates from named plaintiff.	0.1	
6/2/2025	KES	Calendar deadline for review of plans; review documents and emails regarding same.	0.5	
6/6/2025	GCG	Draft email to GW re plan follow up and expert review.	0.1	
6/9/2025	GCG	Email GW and JSY re expert review of Brookhurst plans.	0.1	
6/10/2025	GCG	Review court order re vision issue.	0.1	
6/10/2025	GCG	Confs with JSY and emails GW-team re same and re ER emails re meet and confer.	0.4	
6/10/2025	GCG	Research vision disability impact.	0.1	
6/10/2025	GCG	Review GW comments on Brookhurst plans.	0.1	
6/10/2025	GCG	Emails GW re neutral expert.	0.1	
6/10/2025	JSY	Two conf. w/ GCG re order re vision disabilities.	0.2	
6/10/2025	JSY	Emails re vision disabilities issue.	0.2	
6/10/2025	BBK	Reviewing Court's Order re supplemental briefing on dispute re: class notice; emails re: Brookhurst plan.	0.1	
6/10/2025	KES	Download, review order and calendar deadline.	0.2	
6/11/2025	GCG	Conf with GW re Flores declaration and brief due 6/13.	0.2	
6/11/2025	GCG	Meet via Zoom with GW, BU, MJ and ER.	0.3	
6/11/2025	GCG	Follow up conf with JSY.	0.1	
6/11/2025	GCG	Emails ER-GW re stipulation.	0.2	
6/11/2025	JSY	Conf. w/ GCG re vision disabilities notice issue.	0.2	
6/11/2025	JSY	Emails re vision disabilities issue.	0.1	
6/11/2025	KES	Emails with GCG re settlement related documents.	0.2	
6/12/2025	GCG	Review ER-GW revisions to low vision stipulation.	0.2	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1200

SERVICES

Date	Person	Description of Services	Hours	Discount
6/12/2025	GCG	Emails GW team and conf JSY re same.	0.1	
6/12/2025	JSY	Conf. w/ GCG re vision disability notice issue status.	0.1	
6/13/2025	GCG	Review and analyze order granting preliminary approval.	0.5	
6/13/2025	GCG	Emails GW-team re same and re plan for meet and confer.	0.4	
6/13/2025	JSY	Conf. w/ GCG re preliminary approval.	0.1	
6/13/2025	JSY	Review preliminary approval order; emails re same.	0.4	
6/13/2025	BBK	Reviewing stipulation re: notice for class members w/ vision disabilities.	0.1	
6/13/2025	BBK	Reviewing Court Order granting prelim approval of class action settlement for injunctive relief.	0.2	
6/13/2025	BBK	Emailing w/ RBGG team re deadlines set by Court's Order re Prelim Approval of Class Action Settlement and re: notifying class reps re same.	0.2	
6/13/2025	AHS	Drafted update to class reps.	0.4	
6/13/2025	DLE	Save and circulate filed pleadings, calendar new deadlines.	0.2	
6/14/2025	GCG	Conf with JA re preliminary approval.	0.1	
6/14/2025	GCG	Review and analyze court decision and draft schedule leading to final approval.	0.4	
6/14/2025	GCG	Email GW team re same.	0.1	
6/16/2025	GCG	Emails GW-team re proposed schedule for final settlement approval.	0.5	
6/16/2025	GCG	Draft stipulation re same.	0.2	
6/16/2025	GCG	Conf with and email AS re same.	0.1	
6/16/2025	GCG	Email TG-ER re same.	0.1	
6/16/2025	GCG	Conf with JA re status.	0.1	
6/16/2025	AHS	Call with GCG re proposed deadlines to send to Defs.	0.1	
6/16/2025	AHS	Cross-checked proposed schedule with court's order.	0.2	
6/16/2025	AHS	Drafted language for website on case status.	0.2	
6/17/2025	GCG	Revise stipulation and proposed order re final approval deadlines.	0.3	
6/17/2025	GCG	Emails GW-team and TG-ER re same.	0.3	
6/17/2025	GCG	Conference with KES re status.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG
Page: 1201

SERVICES

Date	Person	Description of Services	Hours	Discount
6/18/2025	GCG	Revise and oversee e-filing of stipulation and proposed order re schedule for final approval of settlement.	0.3	
6/18/2025	GCG	Emails ER-GW and conference with KEJ re same.	0.2	
6/18/2025	BBK	Reviewing stipulation re schedule for fees motion and final approval of class settlement.	0.1	
6/18/2025	AHS	Read full order granting preliminary approval.	0.4	
6/18/2025	KES	(Billing Judgment) Review Stip and PO and reformat final PDF; confer GCG re same.	0.0	0.3
6/18/2025	KES	Efile Stip and PO and email Word version to chambers; download and circulate filed version.	0.3	
6/23/2025	GCG	Review court order setting final approval and fees schedule.	0.1	
6/23/2025	GCG	Conf with and email GW re same and re expert review of Brookhurst plans.	0.2	
6/23/2025	GCG	Emails JSY and TG re same.	0.1	
6/23/2025	GCG	Brief review of plans.	0.1	
6/23/2025	KES	Review and circulate order re final approval deadlines and calendar same.	0.3	
6/24/2025	GCG	Email TG re meeting to discuss plans.	0.1	
6/24/2025	JSY	Emails re Brookhurst plans meeting.	0.1	
6/25/2025	GCG	Emails TG-ER-GW-BBK-JSY re expert review of Brookhurst plans and meeting to discuss same.	0.5	
6/25/2025	JSY	Emails re Brookhurst plans.	0.1	
6/25/2025	BBK	Emails re: Pls' expert comments on draft Brookhurst accessibility plans and re: meet and confer w/ Ds re same.	0.1	
6/26/2025	KES	(Billing Judgment) TC with relative of out of state Brookdale resident and email team re same.	0.0	0.4
7/1/2025	GCG	Emails BBK-GW re Brookhurst plan comments.	0.1	
7/1/2025	BBK	Meet and confer w/ Brookdale re: Brookhurst accessibility plan and re: neutral expert.	0.3	
7/2/2025	BBK	Emailing RBGG team re takeaways and notes from 7/1 meet and confer w/ Ds re Brookhurst accessibility plan and selection of neutral expert.	0.1	
7/3/2025	JSY	Review notes re meeting re Brookhurst plans; emails re same.	0.2	
7/3/2025	DLE	Save and circulate filed pleading.	0.1	
7/4/2025	GCG	Review BBK notes from meeting with TG and ER.	0.1	

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

SERVICES

Date	Person	Description of Services	Hours	Discount
7/7/2025	GCG	Review proposed class notice.	0.1	
7/7/2025	GCG	Emails TG-JSY-team re same.	0.1	
7/7/2025	JSY	Conf w/ GCG re status of class notice, Brookhurst plans, and fees motion.	0.2	
7/7/2025	JSY	Emails re draft notice.	0.1	
7/8/2025	GCG	Emails JSY-TG-GW re issuing class notice.	0.2	
7/8/2025	JSY	Review draft notices; emails re same.	0.4	
7/8/2025	BBK	Reviewing T. Goodwin - JSY emails re class notices and proposal to identify neutral CASp expert.	0.1	
7/9/2025	GCG	Conf with GW and email JSY-BBK-KES re neutral expert choice.	0.1	
7/9/2025	GCG	Email JSY-BBK-KES re notice to class and named plaintiffs.	0.1	
7/9/2025	BBK	Emails w/ GCG and JSY re class notice and agreement re: process for selection neutral CASp, and outreach to named Ps.	0.1	
7/10/2025	GCG	Email JSY re notice plan and plaintiff outreach.	0.1	
7/10/2025	JSY	Emails re notice and next steps with approval process and fees.	0.2	
7/10/2025	JSY	Emails re notice.	0.1	
7/11/2025	GCG	Draft email to clients re class notices.	0.2	
7/11/2025	GCG	Text class representatives re same.	0.1	
7/11/2025	GCG	Confs with and emails JSY re posting class notices to website.	0.2	
7/11/2025	JSY	Conf. w/ GCG re class notices and updates to website.	0.2	
7/11/2025	JSY	Draft website changes re class notices; multiple emails re same.	0.6	
7/11/2025	BBK	Reviewing JSY-TG emails re class notice; reviewing JSY emails to CW re posting class notices on RBGG website for class members.	0.1	
7/14/2025	GCG	Conf with JSY and emails BBK-GW re Grunfeld declaration ISO fees.	0.2	
7/14/2025	JSY	Conf. w/ JA re class notice.	0.2	
7/14/2025	JSY	Emails re updates to website with class notices.	0.2	
7/15/2025	GCG	Email RBGG team about potential calls from class members in light of class notice being issued.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/15/2025	JSY	Emails re class notices.	0.1	
7/15/2025	BBK	Reviewing GCG email re calls from class members re: class action settlement and emails to co-counsel re publishing class notice on website.	0.1	
		Total Professional Services	15,462.9	329.7

Total Professional Services Due **$12,021,846.00**

PERSON RECAP

Person		Hours	Rate	Amount	Discount	Discount
MWB	Michael W. Bien	11.1	$1,675.00	$18,592.50	2.1	$3,517.50
LAE	Lisa A. Ells	10.4	$1,025.00	$10,660.00	0.4	$410.00
EG	Ernest Galvan	4.0	$1,150.00	$4,600.00	0.0	$0.00
GCG	Gay C. Grunfeld	1,962.0	$1,325.00	?,599,650.00	33.7	$44,652.50
SJR	Sanford Jay Rosen	16.6	$1,625.00	$26,975.00	6.0	$9,750.00
JSY	Jenny S. Yelin	2,448.4	$925.00	?,264,770.00	32.1	$29,692.50
BBK	Benjamin Bien-Kahn	2,827.1	$900.00	?,544,390.00	28.2	$25,380.00
MLF	Michael L. Freedman	0.0	$925.00	$0.00	1.4	$1,295.00
CDH	Christopher D. Hu	375.2	$775.00	$290,780.00	6.9	$5,347.50
CEJ	Caroline E. Jackson	0.0	$850.00	$0.00	0.3	$255.00
KJJ	Kara J. Janssen	0.0	$875.00	$0.00	0.5	$437.50
MSN	Michael S. Nunez	0.0	$850.00	$0.00	1.7	$1,445.00
EMA	Eric Monek Anderson	0.0	$600.00	$0.00	2.2	$1,320.00
MEC	Maya Campbell	327.1	$500.00	$163,550.00	5.1	$2,550.00
AG	Alex Gourse	0.0	$600.00	$0.00	3.6	$2,160.00
AH	Adrienne Harrold	0.0	$575.00	$0.00	0.3	$172.50
BCH	Benjamin C. Hattem	65.5	$525.00	$34,387.50	0.0	$0.00
GJG	Ginger Jackson-Gleich	16.0	$575.00	$9,200.00	0.7	$402.50
LK	Luma Khabbaz	0.0	$450.00	$0.00	0.2	$90.00
DWM	Devin W. Mauney	444.8	$775.00	$344,720.00	40.0	$31,000.00
BM	Brenda Munoz	411.7	$550.00	$226,435.00	0.0	$0.00
AHS	Adrienne Spiegel	1,020.0	$550.00	$561,000.00	14.4	$7,920.00
AGS	Andrew G. Spore	0.0	$650.00	$0.00	2.1	$1,365.00
MJT	Mari Tanabe	0.0	$425.00	$0.00	1.8	$765.00
CET	Cara E. Trapani	0.0	$650.00	$0.00	0.2	$130.00
JW	Jessica L. Winter	0.0	$775.00	$0.00	0.9	$697.50
AX	Amy Xu	2,035.8	$700.00	,425,060.00	25.2	$17,640.00
RB	Rebecca Berman	61.3	$350.00	$21,455.00	0.0	$0.00
KC	Kedra Chan	7.1	$350.00	$2,485.00	0.4	$140.00

August 05, 2025
Client: 001457
Matter: 000001
Invoice #: 19759
Resp. Atty: GCG

PERSON RECAP

Person		Hours	Rate	Amount	Discount	Discount
GZG	Gregorio Z. Gonzalez	0.0	$445.00	$0.00	0.3	$133.50
EH	Ellinor Heywood	612.1	$350.00	$214,235.00	3.3	$1,155.00
FGL	F. Gail LaPurja	12.9	$445.00	$5,740.50	10.6	$4,717.00
KES	Karen E. Stilber	2,139.6	$470.00	,005,612.00	32.6	$15,322.00
FFV	Fely F. Villadelgado	19.4	$350.00	$6,790.00	46.1	$16,135.00
HNW	Hanna N. Wallace	10.8	$350.00	$3,780.00	0.3	$105.00
LRW	Luke Weitzenberg	56.9	$350.00	$19,915.00	0.0	$0.00
LHW	Linda H. Woo	89.3	$470.00	$41,971.00	1.0	$470.00
GAB	Grace A. Brew	24.6	$425.00	$10,455.00	0.0	$0.00
PMC	Patrick M. Cano	0.0	$285.00	$0.00	0.7	$199.50
IVD	Ines Diaz	27.8	$425.00	$11,815.00	2.0	$850.00
NKH	Nya Hardaway	31.2	$425.00	$13,260.00	3.3	$1,402.50
JRS	Jessica Santillo	5.7	$425.00	$2,422.50	0.0	$0.00
AD	Alexandra Daniels	16.0	$425.00	$6,800.00	2.4	$1,020.00
DLE	Darcy Edmundson	372.4	$350.00	$130,340.00	16.8	$5,880.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
5/17/2017	Gay Crosthwait Grunfeld- Mileage- Travel to Brookdale Windsor: travel 130.4 miles to/from Brookdale Windsor	$69.11
5/17/2017	Gay Crosthwait Grunfeld- Toll- Travel to Brookdale Windsor: toll	$6.00
5/31/2017	City of Santa Rosa - Records re Fountaingrove and Windsor from Santa Rosa per PRA request	$18.80
7/5/2017	Travel- Meeting w/Co-Counsel: parking	$14.00
7/6/2017	Gay Crosthwait Grunfeld- Mileage- Travel co-counsel ffice for meeting: travel 16.8 miles to/from meeting (GCG)	$8.90
7/6/2017	Gay Crosthwait Grunfeld- Travel to Fountaingrove: bridge toll	$6.75
7/8/2017	Travel to Fountaingrove: lunch	$6.14
7/10/2017	Gay Crosthwait Grunfeld- Mileage- Travel 110 miles to/from Fountaingrove for meeting (GCG)	$58.30
7/14/2017	PR Newswire Association, LLC Press Release for outreach to putative class members	$1,537.16

DISBURSEMENTS

Date	Description of Disbursements	Amount
8/4/2017	Travel- Meeting w/co-counsel: parking	$10.00
8/4/2017	Gay Crosthwait Grunfeld- Mileage- Co-Counsel meeting: travel 16.8 miles to/from meeting (16 @ $0.54)	$8.64
9/18/2017	Online research - fee to obtain records from Alameda Superior Court-Superior Court of Alam	$20.00
9/18/2017	Online research - fee to obtain records from Alameda Superior Court-Superior Court of Alam	$5.00
10/4/2017	Devin W. Mauney- Mileage — drove personal vehicle 102 miles round trip from Oakland to Tracy, CA, to meet with potential client (102 @ $0.54)	$55.08
10/13/2017	Devin W. Mauney- Mileage — drove 56 miles round trip in personal vehicle to meet potential client (56 @ $0.54)	$30.24
11/8/2017	LE- Transportation- Zipcar-DWM travel to/from Santa Rosa, potential client, 11-08-17	$11.75
11/16/2017	Gay Crosthwait Grunfeld- Transportation- Lyft ride - meeting with consultant at co-counsel's office	$21.28
11/16/2017	Gay Crosthwait Grunfeld- Transportation- Lyft ride - meeting with consultant at co-counsel's office	$23.02
3/15/2018	GG- Transportation- Civic Center Plaza - Parking for Oral Argument	$7.50
4/3/2018	Pamela A. Batalo, CSR, Inc.- Transcription and Translation- Transcript of March 15 Hearing	$7.50
4/24/2018	Gay Crosthwait Grunfeld- Mileage- RT travel in own vehicle to CMC in Oakland (20 @ $0.545)	$10.90
4/24/2018	Gay Crosthwait Grunfeld- Transportation- RT travel in own vehicle to CMC in Oakland-Parking	$6.00
6/8/2018	Diane Skillman- Transcription and Translation- Transcript of April 24 hearing	$8.10
7/6/2018	Gay Crosthwait Grunfeld- Mileage- Travel to Schneider Wallace (16.8 miles * 0.545)	$9.16
7/6/2018	Gay Crosthwait Grunfeld- Toll- Travel to Schneider Wallace	$4.00
7/6/2018	Meals- Travel to Oral Argument	$30.47
7/6/2018	Meals- Travel to Oral Argument	$6.15
7/6/2018	Pacer Service Center, CANDC	$12.00
7/13/2018	Gay Crosthwait Grunfeld- Transportation- Bart Fare RT to Oakland for Oral Argument	$8.00
1/22/2019	Diane Skillman, CSR- Transcription and Translation- Transcript Fee July 12, 2018 hearing	$127.50

DISBURSEMENTS

Date	Description of Disbursements	Amount
1/22/2019	Diane Skillman, CSR- Transcription and Translation- 31 pages * 4.25 = 131.75 less ck45506 127.50 = 4.25 July 12, 2018 hearing	$4.25
1/29/2019	Gay Crosthwait Grunfeld- Mileage- Travel to meet at co-counsels office (16 @ $0.58)	$9.28
1/30/2019	Travel- Parking at co-counsel for meeting	$10.00
2/12/2019	Gay Crosthwait Grunfeld- Transportation- Round trip BART to court for CMC	$8.00
2/13/2019	Jenny Yelin- Meals- breakfast and lunch - Westminster to sign up J.A. as class rep	$24.23
2/13/2019	Jenny Yelin- Transportation- Uber/Lyft - tip for drive to airport - to Westminster to sign up J.A. as class rep	$12.00
2/13/2019	Jenny Yelin- Transportation- Uber/Lyft to OAK airport - to Westminster to sign up J.A. as class rep	$68.30
2/13/2019	Jenny Yelin- Travel- Rental Car - to Westminster to sign up J.A. as class rep	$52.56
2/13/2019	Jenny Yelin- Travel- food - to Westminster to sign up J.A. as class rep	$7.22
2/13/2019	Jenny Yelin- Transportation- Bart from OAK airport (no receipt given) - to Westminster to sign up J.A. as class rep	$10.50
2/13/2019	Jenny Yelin- Travel- Airfare - to Westminster to sign up J.A. as class rep	$386.36
3/14/2019	Travel- Parking at a Court-ordered discovery conference before MJ Beeler	$15.00
3/18/2019	Travel- Parking at a Court-ordered discovery conference before MJ Beeler	$15.00
6/7/2019	Travel- Travel for inspection of the Brookhurst facility	$427.60
6/11/2019	Transportation- Taxi - travel home from airport in connection to Brookhurst facility inspection	$62.39
6/11/2019	Meals- Meal - Travel for Brookhurst facility inspection	$9.37
6/11/2019	Transportation- Taxi ride in connection to traveling for Brookhurst facility inspection	$37.20
6/11/2019	Meals- Meal while travel for Brookhurst facility inspection	$41.75
6/11/2019	Meals- meal - traveling for Brookhurst facility inspection	$5.37
6/11/2019	Travel- Airfare - ADA inspection travel	$229.30
6/14/2019	Travel- ADA Inspection Travel	$475.40
6/14/2019	Travel- Hotel/Lodging - ADA Inspection Travel	$211.27
6/14/2019	Transportation- ADA Inspection travel - cab	$72.10

DISBURSEMENTS

Date	Description of Disbursements	Amount
6/17/2019	Meals- Lunch plus tip for GCG, expert and photographer - inspection of Riverwalk	$41.32
6/17/2019	Transportation- Taxi - transportation in connection to Riverwalk inspection	$63.80
6/18/2019	Transportation- National Rental Car - Travel to Bakersfield for ADA Inspection	$150.21
6/18/2019	Transportation- Travel to Bakersfield for Riverwalk ADA inspection	$72.10
6/18/2019	Transportation- Zipcar to attend site inspection	$74.86
6/20/2019	Jenny Yelin- Meals- Breakfast and lunch - Site inspection of Windsor	$16.40
6/21/2019	Transportation- ADA Travel - cab	$48.00
7/15/2019	Toll- Toll while traveling - to attend site inspection	$7.00
7/16/2019	Gay Crosthwait Grunfeld- Transportation- Uber fare to court for CMC	$21.89
7/16/2019	Gay Crosthwait Grunfeld- Transportation- Bart fare to court for CMC	$4.10
7/17/2019	Transportation- Zip car - Scotts Valley Site Inspection	$78.12
7/18/2019	Jenny Yelin- Meals- Breakfast and lunch - Scotts Valley site inspection	$17.80
7/30/2019	Facility Access Consulting, Inc- Professional Services- Professional Services in June 2019	$9,728.92
7/31/2019	Schneider Wallace- Professional Services- 50% of Pacific Access Consulting expert invoice Professional Services in June 2019	$9,899.99
8/1/2019	Gay Crosthwait Grunfeld- Mileage- Roundtrip travel to a meeting with co-counsel regarding class cert. planning (16.6 miles * .58)	$9.62
8/1/2019	Jenny Yelin- Travel- Lyft tip - Meeting with co-counsel	$3.00
8/1/2019	Jenny Yelin- Travel- Lyft back to office - Meeting with co-counsel	$19.78
8/1/2019	Transportation- Parking - The Towers - meeting	$12.00
8/21/2019	JAMS- Professional Services- Mediation 50% of Plaintiffs' share for 10/8/2019 mediation.	$4,700.00
8/30/2019	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% shared billing - Accessibility Consulting and 8/30 invoice for August 2019 services	$8,782.24
9/19/2019	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% shared billing - 8/30 invoice for August 2019 services	$7,302.41
10/21/2019	Facility Access Consulting, Inc- Professional Services- 50% of Professional Services in August 2019	$5,338.99
10/21/2019	Facility Access Consulting, Inc- Professional Services- 50% Professional Services in September 2019	$3,668.55

DISBURSEMENTS

Date	Description of Disbursements	Amount
11/4/2019	Facility Access Consulting, Inc- Professional Services- 50% Professional Services in October 2019	$10,047.84
11/22/2019	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% of Oct/Nov 2019 services	$5,785.75
12/12/2019	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services-50% of December 2019 services	$4,861.61
12/17/2019	Travel- Parking for Co Counsel meeting	$12.00
2/3/2020	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% of January 2020 services	$9,585.21
2/4/2020	JM- Filing Fee- Court call fee	$35.00
2/8/2020	Facility Access Consulting, Inc- Professional Services-50% Professional Services - January 2020	$3,809.12
2/8/2020	Facility Access Consulting, Inc- Professional Services- 50% Professional Services - December 2019	$1,717.68
2/27/2020	Travel- Parking for hearing before MJ Beeler, US district court	$20.00
3/23/2020	Facility Access Consulting, Inc- Professional Services- Expert Fees - February 2020	$5,830.80
3/27/2020	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services-50% Brookdale litigation	$7,254.51
8/28/2020	Facility Access Consulting, Inc- Professional Services-50% Expert Services 03/18/2020 - 04/30/2020	$3,993.75
8/28/2020	Facility Access Consulting, Inc- Professional Services- 50% Expert Services 06/23/2020 - 06/30/2020	$2,700.00
8/28/2020	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and Litigation Support Services.	$1,250.00
8/28/2020	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Annual Subscription - BlueDAG database reporting system	$1,250.00
12/10/2020	Facility Access Consulting, Inc- Professional Services- 50% of Services 11/01/2020-11/30/2020	$3,390.00
12/15/2020	Facility Access Consulting, Inc- Professional Services-50% of Services 07/01/2020 - 07/31/2020	$3,993.75
12/15/2020	Facility Access Consulting, Inc- Professional Services-50% of Services 08/25/2020 - 09/25/2020	$7,368.75
12/15/2020	Facility Access Consulting, Inc- Professional Services- 50% of Services 10/03/2020-10/31/2020	$3,236.25

DISBURSEMENTS

Date	Description of Disbursements	Amount
1/5/2021	Facility Access Consulting, Inc- Professional Services- Professional services - December 2020 - Expert fee	$1,350.00
1/8/2021	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and litigation support services 50% of December 2020 services	$10,455.00
2/1/2021	Facility Access Consulting, Inc- Professional Services- Services 01/07/2021 - 01/31/2021 (split 50%)	$5,276.25
3/13/2021	Facility Access Consulting, Inc- Professional Services- Services 02/17/2021 - 02/27/2021 (split 50%)	$5,250.00
3/18/2021	US Legal Support dba Litivate- Transcription and Translation- Video Deposition services - Kimia Ataein	$1,337.50
3/23/2021	Ben Bien-Kahn- Travel- Parking - had to come into office to make sure workspace set up to conduct remote deposition	$30.00
3/31/2021	Titan Legal Services, Inc,- Professional Services- Subpoena services from 4Front Technologies	$60.00
3/31/2021	Titan Legal Services, Inc,- Professional Services- Subpoena services - records from Fairchild communications services	$76.50
4/5/2021	US Legal Support dba Litivate- Transcription and Translation- Original and 1 certified transcript of Marie Harris	$3,569.17
4/6/2021	US Legal Support dba Litivate- Transcription and Translation- Original and 1 certified transcript of Anna Reddy	$4,724.27
4/9/2021	US Legal Support dba Litivate- Transcription and Translation- Video deposition services - Theresa Ward	$1,450.00
4/9/2021	US Legal Support dba Litivate- Transcription and Translation- Video Deposition services - Marie Harris	$1,337.50
4/12/2021	Facility Access Consulting, Inc- Professional Services- 50% of Services 03/13/2021 - 03/28/2021	$3,926.25
4/14/2021	Ben Bien-Kahn- Travel- Parking for trip to office to set up remote deposition workspace for 4/16 deposition	$27.00
4/16/2021	Ben Bien-Kahn- Travel- Parking for 4/16 Buot Deposition	$30.00
4/22/2021	Titan Legal Services, Inc,- Professional Services- Records from Stanley Healthcare Center Operating Company, LLC	$84.90
4/30/2021	Titan Legal Services, Inc,- Professional Services- Records from RF Technologies, Inc. dba RF Technologies Code Alert	$76.50
5/2/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Certified Copy of Transcript - Ferdinand Augustus Buot, Jr.	$2,026.35
5/11/2021	Schneider Wallace Cottrell Konecky Wotkyns LLP- Professional Services- 50% eDiscovery costs	$55,914.47

DISBURSEMENTS

Date	Description of Disbursements	Amount
5/12/2021	US Legal Support dba Litivate- Transcription and Translation- Video Deposition services - Ferdinand Buot	$1,262.50
5/24/2021	Outside Copying and Scanning	$1,204.95
5/28/2021	Titan Legal Services, Inc.- Professional Services- Records from Lifeline Systems Company c/o CSC Lawyers, Inc.	$106.50
5/28/2021	Titan Legal Services, Inc.- Professional Services- Records from 4Front Technologies c/o Shawn Tofte	$182.00
5/28/2021	Titan Legal Services, Inc.- Professional Services- Records from Silversphere, LLC c/o Incorp Services, Inc.	$76.50
6/4/2021	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% of services performed January - June 3, 2021	$15,820.00
6/7/2021	Facility Access Consulting, Inc- Professional Services- 50% of ADA expert report writing fees May 2021	$5,553.75
6/17/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Certified Copy of Transcript - Kevin Wayne Bowman - 06/09/2021	$1,815.50
6/19/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Videotape Services - Brookdale for Topic 11 - 06/09/2021	$812.50
6/23/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Certified Copy of Transcript - Kevin Bowman - 06/17/2021	$1,603.79
6/23/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Certified Copy of Transcript - Kevin Bowman - 06/17/2021	$2,214.59
6/25/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Videotape Services - Brookdale for Topic 3 - 06/03/2021	$475.00
6/27/2021	Cary's Attorney Service & Invest.- Professional Services- Potential Witness Investigation Work	$1,218.00
6/30/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Videotape Services - Kevin Bowman - 06/17/2021	$1,200.00
6/30/2021	US Legal Support, Inc. dba Litivate- Transcription and Translation- Video Deposition Services - Sheila Garner - 06/30/2021	$1,337.50
7/2/2021	360 IQ Inc.- Professional (Investigator) Services- Interview Write-ups - 06/04/2021-06/30/2021	$4,706.25
7/2/2021	Facility Access Consulting, Inc- Professional Services- Services 06/01/2021 - 06/30/2021 (Split 50%)	$24,540.00
8/20/2021	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and Litigation Support Services (50% of services in August 2021)	$20,440.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
8/20/2021	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and Litigation Support Service (50% of services in June/July 2021)	$30,240.00
8/30/2021	United Litigation Discovery- Outside Copying and Scanning- Print B&W with Assembly	$835.49
9/1/2021	Facility Access Consulting, Inc- Professional Services- Services 07/01/2021 - 07/31/2021 (Split 50%)	$15,007.50
9/8/2021	Facility Access Consulting, Inc- Professional Services- Services 08/01/2021 - 08/31/2021 (Split 50%)	$15,264.38
11/18/2021	United Litigation Discovery- Outside Copying and Scanning- Scan Heavy Litigation	$115.87
11/30/2021	East Bay Dispute & Advisory LLC- Professional Services- Retainer for Expert Services	$10,000.00
12/10/2021	Amy Xu- Mileage- Mileage to and from Felton and back home on 12/10/21 for a prep session with plaintiff. (140 @ $0.56)	$78.40
12/10/2021	Amy Xu- Meals- Lunch for Amy Xu and Bernie Jestrabek-Hart on 12/10/21	$41.37
12/11/2021	Jenny Yelin- Travel- Airfare for Jeanette Algarme deposition	$416.00
12/11/2021	Jenny Yelin- Transportation- Rental Car for Jeanette Algarme deposition	$144.25
12/11/2021	Jenny Yelin- Travel- Sonesta ES Suites in Fountain Valley for Jeanette Algarme deposition	$142.63
12/11/2021	Jenny Yelin- Transportation- Lyft from SFO for Jeanette Algarme deposition	$38.69
12/11/2021	Jenny Yelin- Transportation- Lyft to SFO for Jeanette Algarme deposition	$43.95
12/11/2021	Jenny Yelin- Meals- - Dinner 12/9 during Jeanette Algarme deposition	$16.00
12/11/2021	Jenny Yelin- Meals- Breakfast on 12/9 during Jeanette Algarme deposition	$16.85
12/11/2021	Jenny Yelin- Meals- Lunch on 12/9 during Jeanette Algarme deposition	$14.79
12/11/2021	Jenny Yelin- Meals- Breakfast and lunch on 12/10 during Jeanette Algarme deposition	$15.05
12/13/2021	Amy Xu- Mileage- Mileage to and from Felton and back home to San Francisco for 12/13/21 deposition of Bernie Jestrabek-Hart. (140 @ $0.56)	$78.40
12/13/2021	Amy Xu- Meals- Lunch for Amy Xu and Bernie Jestrabek-Hart on 12/13/21	$30.50
12/15/2021	Facility Access Consulting, Inc- Professional Services- Expert Services September through November 2021 (Split 50%)	$2,925.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
12/15/2021	Facility Access Consulting, Inc- Professional Services- Deposition Fee: Testimony Rate - Jeff Mastin - 12/14/2021 (Split 50%)	$1,487.50
12/20/2021	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through December 15, 2021 (Original amount $26,797.32; $10,000.00 deducted to account for retainer sent 12/3/2021)	$16,797.32
12/20/2021	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through December 15, 2021 ($10,000 originally assumed to be retainer and deducted; now corrected to fulfill the full amount of $26797.32)	$10,000.00
12/21/2021	Jenny Yelin- Travel- Uber/Lyft to SFO for Jeanette Algarme deposition	$49.94
12/21/2021	Jenny Yelin- Travel- Airfare for Jeanette Algarme deposition	$173.40
12/21/2021	Jenny Yelin- Travel- Airfare cost to change flight to SNA for Jeanette Algarme deposition	$230.00
12/21/2021	Jenny Yelin- Transportation- Gas for rental car for Jeanette Algarme deposition	$12.90
12/21/2021	Jenny Yelin- Meals- - breakfast on 12/17 for Jeanette Algarme deposition	$8.81
12/21/2021	Jenny Yelin- Meals- lunch on 12/17 for Jeanette Algarme deposition	$26.92
12/21/2021	Jenny Yelin- Meals- dinner on 12/17 for Jeanette Algarme deposition	$14.30
12/21/2021	Jenny Yelin- Travel- Ayres Hotel Fountain Valley for Jeanette Algarme deposition	$225.06
12/21/2021	Jenny Yelin- Meals- - breakfast on 12/18 for Jeanette Algarme deposition	$10.00
12/29/2021	Veritext- Transcription and Translation- Transcript Services - Witness: Jeanette Algarme, Vol 2	$903.96
12/30/2021	AMEX - KH- Miscellaneous- Peerspace - Conference room booking - depo prep for Loresia Valette	$798.11
12/31/2021	Veritext- Transcription and Translation- Transcript Services - Witness: Jeanette Algarme	$805.95
1/5/2022	East Bay Dispute & Advisory LLC- Professional Services- Alter Ego Expert Witness	$6,689.82
1/5/2022	AMEX - KH- Miscellaneous- Colab - Carlson depo prep and depo in Santa Rosa - January 24 and 25	$280.00
1/5/2022	AMEX - KH- Colab - Carlson depo prep and depo in Santa Rosa - January 24 and 25	$367.50
1/6/2022	Pacific Access Consulting, Inc.- Professional Services- Accessibility Consulting and Litigation Support Service - 50% of services through December 2021	$9,508.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
1/9/2022	Amy Xu- Meals- Dinner for Amy Xu on 1/9/22 for Loresia Vallette deposition	$17.25
1/9/2022	Amy Xu- Travel- Courtyard by Marriott - Hotel for Amy Xu on Jan 9-11, 2022 for Loresia Vallette deposition	$474.23
1/9/2022	Amy Xu- Travel- Airfare from Oakland to Long Beach on 1/09/22 for Loresia Vallette deposition	$215.98
1/10/2022	Amy Xu- Meals- Dinner for Amy Xu on 1/10/22 for Loresia Vallette deposition	$13.62
1/10/2022	Amy Xu- Meals- Lunch for Amy Xu and Loresia Vallette on 1/10/22 for Loresia Vallette deposition	$35.17
1/11/2022	Veritext- Transcription and Translation- Transcript Services - Witness: Bernie Jestrabek-Hart	$2,330.40
1/11/2022	Amy Xu- Meals- Dinner for Amy Xu on 1/11/22 for Loresia Vallette deposition	$18.06
1/11/2022	Amy Xu- Meals- Lunch for Amy Xu and Loresia Vallette on 1/11/22 for Loresia Vallette deposition	$32.71
1/11/2022	Amy Xu- Meals- Breakfast for Amy Xu and Loresia Vallette for Loresia Vallette deposition	$15.40
1/11/2022	Amy Xu- Travel- Airfare for Amy Xu on 1/11/22 for Loresia Vallette deposition	$128.60
1/11/2022	Amy Xu- Travel- Lyft to LAX for Amy Xu for Loresia Vallette deposition	$45.52
1/11/2022	Amy Xu- Travel- Lyft for Amy Xu from SFO to home for Loresia Vallette deposition	$30.29
1/11/2022	AMEX - KH- Peerspace - Conference room booking - depo prep for Loresia Valette	$134.14
1/13/2022	Ben Bien-Kahn- Meals- Breakfast during travel to Felton for Pat Lindstrom Deposition	$12.78
1/13/2022	Ben Bien-Kahn- Meals- Lunch after depo prep in Felton	$8.55
1/13/2022	Ben Bien-Kahn- Meals- Dinner night before Pat Lindstrom Deposition	$19.44
1/14/2022	Ben Bien-Kahn- Meals- Breakfast morning of Pat Lindstrom Deposition	$7.50
1/14/2022	Ben Bien-Kahn- Meals- Lunch during deposition (for BBK & Pat Lindstrom)	$18.06
1/14/2022	Ben Bien-Kahn- Travel- Hilton - Hotel stay for one night for Pat Lindstrom Deposition	$159.03
1/24/2022	Veritext- Transcription and Translation- Transcript Services - Witness: Michele Lytle	$1,169.45
1/24/2022	Ben Bien-Kahn- Meals- Breakfast during travel to Santa Rosa for depo prep	$9.52

DISBURSEMENTS

Date	Description of Disbursements	Amount
1/24/2022	Ben Bien-Kahn- Meals- Lunch for BBK and Ralph Carlson during in person deposition prep session	$48.77
1/24/2022	Ben Bien-Kahn- Meals- Dinner after depo prep night before Ralph Carlson Deposition	$29.07
1/25/2022	Ben Bien-Kahn- Travel- Hotel La Rose - Hotel stay in Santa Rosa for Ralph Carlson Deposition	$184.68
1/25/2022	Ben Bien-Kahn- Meals- Breakfast morning of Ralph Carlson Deposition	$6.78
1/25/2022	Ben Bien-Kahn- Meals- Lunch for BBK and Ralph Carlson during deposition	$49.64
1/27/2022	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through January 15, 2022	$13,113.19
1/27/2022	Ralph Carlson- Travel- Parking for in-person depo prep	$5.00
1/31/2022	Facility Access Consulting, Inc- Professional Services- Expert Services - December 2021 through January 2022 (Split 50%)	$4,050.00
2/1/2022	Veritext- Transcription and Translation- Transcript Services - Witness: Patricia Lindstrom	$1,240.80
2/1/2022	Veritext- Transcription and Translation- Transcript Services - Witness: Ralph Carlson	$1,261.10
2/3/2022	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through January 31, 2022	$8,898.75
2/16/2022	Veritext- Transcription and Translation- Transcript Services - Witness: Loresia Valette	$1,357.40
2/22/2022	Marks Balette Giessel & Young, PLLC- Professional Services- Brookdale Expert Costs	$62,950.74
2/25/2022	360 IQ Inc.- Witness Investigation Services- Brookdale locate research, tcs, interview & writes-ups - January 7 - February 25	$5,075.00
3/17/2022	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through March 15, 2022	$17,982.57
4/8/2022	East Bay Dispute & Advisory LLC- Professional Services- Services Rendered Through March 31, 2022	$2,380.82
4/12/2022	Jenny Yelin- Travel- Airfare to and from ONT (this reflects original ticket and additional $43 paid to change flight due to shortened deposition) for Bennie Williams deposition	$384.96
4/12/2022	Jenny Yelin- Transportation- Lyft to OAK for Bennie Williams deposition	$67.95
4/12/2022	Jenny Yelin- Travel- Lyft home from OAK for Bennie Williams deposition	$54.66
4/12/2022	Jenny Yelin- Meals- breakfast during Bennie Williams deposition	$23.84
4/12/2022	Jenny Yelin- Meals- lunch during Bennie Williams deposition	$13.90

DISBURSEMENTS

Date	Description of Disbursements	Amount
4/12/2022	Jenny Yelin- Transportation- Payless - rental car ($200 hold was refunded to me so only need $77.98 reimbursed) for Bennie Williams deposition	$77.98
4/15/2022	U.S. Legal Support - SF- Transcription and Translation- Remote Video conference re: Deposition of Ali Saad	$797.38
4/18/2022	U.S. Legal Support - SF- Transcription and Translation- Videography Services witness deposition	$428.50
4/25/2022	Gay Crosthwait Grunfeld- Purchase of Brookdale CEO book	$14.99
4/28/2022	U.S. Legal Support - SF- Transcription and Translation- Video Late Cancellation: Verlene Thompson	$330.00
4/30/2022	Veritext- Transcription and Translation- Video Services - Witness: Carl Mariz	$587.00
5/2/2022	Ben Bien-Kahn- Travel- Airfare - round trip Oakland to Ontario for 4/29 Deposition	$586.96
5/2/2022	Ben Bien-Kahn- Travel- Holiday Inn Ontario Airport - Hotel Stay for 4/29 Deposition	$213.14
5/2/2022	Ben Bien-Kahn- Transportation- BART to Oakland Airport for 4/29 Deposition	$11.00
5/2/2022	Ben Bien-Kahn- Travel- Taxi from airport to hotel on 4/28 for 4/29 Deposition	$20.00
5/2/2022	Ben Bien-Kahn- Meals- Food during travel on 4/28 for 4/29 Deposition	$14.01
5/2/2022	Ben Bien-Kahn- Meals- Meal on 4/29 during post depo travel	$19.68
5/2/2022	Ben Bien-Kahn- Travel- Lyft fares on 4/29 (hotel to depo; depo to Ontario airport; Oakland airport home)	$97.11
5/5/2022	Veritext- Transcription and Translation- Certified Transcript - Witness: Carl Mariz	$1,791.17
5/5/2022	Echo Reporting, Inc.- Transcription and Translation- 3/31/22 & 4/21/22 Transcript of Proceedings	$27.90
5/6/2022	Ace Attorney Service, Inc.- Professional Services- Deposition Subpoenas service and attempted service on defense witnesses in March and April	$6,666.46
5/6/2022	KH- Online Research - Fee for court records- Complaint - Confirmation #840662	$17.80
5/10/2022	360 IQ Inc.- Professional Services- Brookdale interviews including ME locate research	$1,800.00
5/12/2022	Veritext- Transcription and Translation- Video Services - Witness: Margaret (Marjory) Stitt	$965.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
5/14/2022	Rebecca Berman- Amazon - Purchase of eBook version of Brookdale CEO book	$14.99
5/16/2022	Veritext- Transcription and Translation- Video Services - Witness: Carolyn Toolen	$859.00
5/20/2022	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services-50% of Expert work in connection with reply declaration	$18,228.00
5/20/2022	Facility Access Consulting, Inc- Professional Services- April 2022 effort and expenses (Split 50%)	$3,150.00
6/6/2022	Facility Access Consulting, Inc- Professional Services- May 2022 effort and expenses (Split 50%)	$11,756.25
7/8/2022	Gay Crosthwait Grunfeld- Mileage- 32 miles round-trip in my personal vehicle to go to oral argument on motion for class certification (32 @ $0.625)	$20.00
7/8/2022	Gay Crosthwait Grunfeld- Toll- Toll to go to oral argument on motion for class certification	$6.00
7/8/2022	Travel- ACE Parking - Oral Argument G Brookdole	$40.00
7/10/2022	June Isaacson Kailes- Professional Services- Expert Services January - May 2022 (split 50% with co-counsel)	$4,131.00
7/19/2022	Satellite Workspace - Invoice #00012136 - for depo prep and remote depo space for 2 clients near Scotts Valley in December 2021 and January 2022	$612.00
7/22/2022	Raynee Mercado, CSR RMR CRR FCRR CCRR- Transcription and Translation- 7/8/22 motions hearing transcript	$53.10
7/29/2022	US Legal Support, Inc. dba Litivate- Transcription and Translation- Video Late Cancellation: Barbara Steed	$280.00
7/29/2022	US Legal Support, Inc. dba Litivate- Transcription and Translation- Videography Services of Aurora Deaux	$280.00
8/16/2022	Torrey Partners, LLC- Professional Services- Expert Witness Fee for Dr. Kennedy	$20,254.75
8/31/2022	Long distance telephone charges (4605 @ $0.05)	$230.25
11/22/2022	Ad Hoc Reporting- Transcription and Translation- Transcript of November 17, 2022 Discovery Hearing	$18.90
1/12/2023	Online research- Public Portal - Superior Court of AlamedaCounty	$19.00
2/1/2023	Marks Balette Giessel & Young, PLLC- Professional Services- Brookdale Expert Costs in connection with Class Certification Motion	$64,700.68
2/27/2023	Marks Balette Giessel & Young, PLLC- Professional Services- Brookdale Expert Costs in connection with Class Certification Motion	$64,700.68

DISBURSEMENTS

Date	Description of Disbursements	Amount
8/25/2023	Transportation- Uber Trip - Travel to CMC in Oakland	$41.40
10/31/2023	Facility Access Consulting, Inc- Professional Services- September/October 2023 Principal Effort (split 50%)	$6,750.00
11/1/2023	AMEX - KH- Satellite Workspace - yearly access fee Rental of office space near Brookdale clients while defending depos	$112.04
2/1/2024	Adrienne Spiegel- Transportation- Lyft with KS to courthouse in Oakland	$39.59
2/1/2024	Jenny Yelin- Transportation- Transportation - WAV taxi return from Oakland to Scotts Valley cash tip handed to driver for ride for clients from hearing.	$60.00
2/1/2024	Transportation- Uber to Brookdale Oral Argument	$6.52
2/1/2024	Transportation- Uber to Brookdale Oral Argument	$43.51
2/1/2024	KH- Transportation- Yellow Cab - to/from Scotts Valley - Oakland Trip for clients to attend February 1 Hearing	$261.30
2/1/2024	KH- Transportation- Yellow Cab - to/from Scotts Valley - Oakland Trip for clients to attend February 1 Hearing	$260.40
2/1/2024	KH- Transportation- Yellow Cab - extra dropoff for Lindstrom Trip for clients to attend February 1 Hearing	$49.20
2/2/2024	Karen Stilber- Transportation- Cash tip to Yellow Cab driver for WAV taxi for clients from Scotts Valley to Oakland courthouse for 2/1/24 hearing	$60.00
2/13/2024	Transportation- Uber - Travel from CMC	$50.57
2/13/2024	Transportation- Uber - Travel to Court for CMC	$51.41
2/14/2024	Travel- Travelworks - Travel to Court for CMC	$38.00
2/29/2024	Ace Attorney Service, Inc.-Service of Process on defense witness- Order #2292336 - Subpoena Testify 3/19	$305.21
2/29/2024	Ace Attorney Service, Inc.- service of process on defense witness"- Order #2292337 - Subpoena Testify 3/19	$99.00
2/29/2024	Ace Attorney Service, Inc.- Service of Process on defense witness- Order #2292338 - Subpoena Testify 3/19	$44.00
2/29/2024	Ace Attorney Service, Inc.- service of depo subpoena on defense witness- Order #2292298 - Letter; Subpoena	$237.48
2/29/2024	Ace Attorney Service, Inc.- service of depo subpoena on defense witness- Order #2292309 - Letter; Subpoena	$99.00
2/29/2024	Ace Attorney Service, Inc.- service of depo subpoena on defense witness- Order #2292309 - Letter; Subpoena	$44.00
2/29/2024	KH- Professional Services- Satellite Workspaces - Conference Room Reservation for deposition of defense witness	$225.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
3/1/2024	Ace Attorney Service, Inc.- Service of depo subpoena on defense witness- Order #2292529 - Ltr; Subpoena	$210.07
3/1/2024	Ace Attorney Service, Inc.- Service of depo subpoena on defense witness- Order #2292533 - Ltr; Subpoena	$157.95
3/1/2024	KH- Transportation- ZipCar - for March 5 Fountaingrove inspection Travel by Benjamin Joseph Bien Kahn	$92.88
3/4/2024	Ace Attorney Service, Inc.- Service of depo subpoena on defense witness- Order #2293405 - Ltr; Subpoena	$232.91
3/6/2024	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- 50% of Inspections of Brookdale San Ramon and Fountaingrove	$5,690.47
3/6/2024	Ben Bien-Kahn- Transportation- Lyft to ZipCar for Fountaingrove Inspection	$10.75
3/6/2024	Ben Bien-Kahn- Meals- Breakfast & Lunch during inspection	$16.13
3/7/2024	Amy Xu- Mileage- Mileage for Brookhurst inspection (81 @ $0.67)	$54.27
3/7/2024	Amy Xu- Meals-Breakfast and lunch for AX during Brookhurst inspection	$20.40
3/12/2024	Amy Xu- Transportation- Kyte - Rental Car for AX for ADA inspection at Brookdale Hemet	$159.85
3/13/2024	Amy Xu- Meals- Breakfast and lunch for AX on day of ADA inspection at Brookdale Hemet	$24.45
3/14/2024	Amy Xu- Transportation- Gas for rental car for ADA inspection at Brookdale Hemet	$29.86
3/14/2024	KH- Toll- ZipCar - BBK toll re March 5 Fountaingrove inspection	$9.75
3/14/2024	Torrey Partners, LLC- Professional Services- Services Rendered Through February 28, 2023 (1/2 of total)	$402.50
3/19/2024	Adrienne Spiegel- Travel- Courtyard by Marriott - Hotel stay during Trip to Scotts Valley for Depos and Inspection	$371.94
3/19/2024	Adrienne Spiegel- Mileage- Mileage for drive from home to Courtyard Marriott Santa Cruz during Trip to Scotts Valley for Depos and Inspection (78 @ $0.67)	$52.26
3/20/2024	Adrienne Spiegel- Meals- Wednesday Dinner during Trip to Scotts Valley for Depos and Inspection	$33.41
3/20/2024	Adrienne Spiegel- Mileage- Mileage to Courtyard Marriott Santa Cruz to 1st deposition location (Satellite Workspace, 325 Soquel Ave) and back during Trip to Scotts Valley for Depos and Inspection (2 @ $0.67)	$1.34
3/20/2024	Adrienne Spiegel- Mileage- Mileage to Courtyard Marriott Santa Cruz to second deposition location (Satellite Workspace, 325 Soquel Ave) and back during Trip to Scotts Valley for Depos and Inspection (2 @ $0.67)	$1.34

DISBURSEMENTS

Date	Description of Disbursements	Amount
3/21/2024	Adrienne Spiegel- Meals- Breakfast before inspection during Trip to Scotts Valley for Depos and Inspection	$22.08
3/21/2024	Adrienne Spiegel- Meals- Lunch for AS and expert Jeff Mastin during Trip to Scotts Valley for Depos and Inspection	$31.20
3/21/2024	Adrienne Spiegel- Meals-Dinner after inspection before driving back to SF during Trip to Scotts Valley for Depos and Inspection	$17.27
3/21/2024	Adrienne Spiegel- Mileage- Mileage from Courtyard Marriott to Brookdale Scotts Valley during Trip to Scotts Valley for Depos and Inspection (8 @ $0.67)	$5.36
3/21/2024	Adrienne Spiegel- Mileage- Mileage from Brookdale Scotts Valley to home (San Francisco, CA) during Trip to Scotts Valley for Depos and Inspection (73 @ $0.67)	$48.91
3/22/2024	Ace Attorney Service, Inc.- service of deposition subpoena on defense witness- Order #2300902	$226.25
3/22/2024	Ace Attorney Service, Inc.-service of deposition subpoena on defense witness- Order #2300903	$104.54
3/26/2024	KH- Professional Services- Regus - Office space for deposition of defense witness	$306.00
3/26/2024	KH- Professional Services- of defense witness Satellite Flexible Workspaces - Conference Room for Deposition	$150.00
3/27/2024	Amy Xu- Travel- Alaska Air - Airfare for AX from LAX to SFO for deposition	$376.20
3/27/2024	Amy Xu- Travel- Hyatt Regency - Hotel stay for deposition	$382.62
3/27/2024	Amy Xu- Transportation- Lyft from LA to LAX for deposition	$55.19
3/27/2024	Amy Xu- Transportation- Uber from SFO to hotel for deposition	$48.91
3/28/2024	Ace Attorney Service, Inc.- service of deposition subpoena on defense witness- Order #23022803	$350.00
3/28/2024	Amy Xu- Transportation- Uber from downtown SF to SFO for deposition	$57.97
3/28/2024	Amy Xu- Transportation- Uber from LAX to home for deposition	$49.94
3/28/2024	Amy Xu- Meals- Dinner for AX on 3/27 for deposition	$22.50
3/28/2024	Amy Xu- Meals- Breakfast and lunch for AX on day of deposition	$26.09
3/31/2024	United Litigation Discovery- Outside Copying and Scanning- Case Name: IMAN-DMS.FID39756 - iPhone and Email collection	$1,000.00
3/31/2024	United Litigation Discovery- Outside Copying and Scanning- Case Name: IMAN-DMS.FID39756 - Native Processing RSMF	$1,515.93
3/31/2024	United Litigation Discovery- Outside Copying and Scanning- Forensic Collection	$375.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
4/1/2024	Adrienne Spiegel- Amazon - Hard drive shipped to client for document collection for discovery	$24.28
4/3/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - Dimple Kamdar (Mar 28, 2024)	$2,698.15
4/4/2024	Alex Barchuk MD Incorporated- Professional Services- Expert witness services	$7,000.00
4/4/2024	Amy Xu- Transportation- Kyte - Rental Car to drive from LA to San Bernardino for deposition	$94.16
4/4/2024	Amy Xu- Outside Copying and Scanning- FedEx - Copying fees for exhibits for deposition	$14.09
4/4/2024	Amy Xu- Transportation- Chevron - Gas for rental car for deposition	$23.54
4/5/2024	KH- Professional Services- Regus - April 4 office space for deposition of Kelli Zahner	$325.00
4/7/2024	Facility Access Consulting, Inc- Professional Services- March 2024 Principal Effort (split 50%)	$9,257.69
4/7/2024	Facility Access Consulting, Inc- Professional Services- February 2024 Principal Effort (split 50%)	$1,350.00
4/8/2024	KH- Professional Services- Satellite Flexible Workspaces - Conference Room for Deposition	$187.50
4/9/2024	Ace Attorney Service, Inc.- Professional Services- Order #2306816 - Subpna Testify 4/25	$332.95
4/9/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Videographer fee for late cancellation of defense witness depo	$834.10
4/9/2024	Ace Attorney Service, Inc.- service of subpoena on defense witness- Order #2306828 - Subpoena to Testify April 30	$463.50
4/18/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - JOHN BEATY (Mar 20, 2024)	$776.30
4/18/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - DIANA KAUFELDT (Mar 20, 2024)	$1,253.05
4/22/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Expedited Transcripts, Video, Reporter Appearance) - Deposition - VALENTINE MATHANGANI (Apr 17, 2024)	$2,467.75
4/22/2024	Ace Attorney Service, Inc.- Professional Services- Order #2303946 - Service of Subpna to Test 4/23	$255.22

DISBURSEMENTS

Date	Description of Disbursements	Amount
4/23/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - KELLI ZAHNER (Apr 4, 2024)	$1,490.05
4/25/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Expedited Transcripts, Reporter Appearance, Video) - Deposition - JENNIFER GORDON-ALVAREZ (Apr 19, 2024)	$3,033.10
5/1/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - Ann Wahl (Apr 16, 2024)	$1,788.80
5/1/2024	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and Litigation Support Service 50% of services related to preparation of Rule 26 report and associated attachments	$15,275.00
5/3/2024	Adrienne Spiegel- Book that Expert Consulted On for Expert Report	$6.51
5/8/2024	Adrienne Spiegel- Purchased kindle version of book by expert	$13.29
5/10/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Transcripts, Reporter Appearance, Video) - Deposition - Carole Presley (Apr 26, 2024)	$1,708.05
5/13/2024	Facility Access Consulting, Inc- Professional Services- April 2024 Principal Effort (split 50%)	$13,106.25
6/4/2024	KH- Professional Services- Scotts Valley Fire Prof - production of public records	$52.00
6/5/2024	Facility Access Consulting, Inc- Professional Services- May 2024 Principal Effort (split 50%)	$4,185.00
6/6/2024	June Isaacson Kailes- Professional Services- Expert Services December 2023 - May 2024 (split 50% with co-counsel)	$9,668.75
6/10/2024	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- ADA Expert Services (%50 of services May 1 - June 4, 2024)	$5,200.00
6/11/2024	Alex Barchuk MD Incorporated- Professional Services- Consultation	$2,500.00
6/18/2024	San Ramon Valley Fire Protection District- Outside Copying and Scanning-	$10.00
6/27/2024	Jenny Yelin- Travel- City Center Garage - Parking for Hearing 6/27/24	$36.00
6/27/2024	Travel- Parking at USDC-ND to attend Hearing on Subclass Certification Motion	$3.45
6/27/2024	KH- Transportation- Yellow Checker Cab - Clients' WAV taxi round-trip from Scotts Valley to ND for class cert hearing	$261.30
6/27/2024	KH- Transportation- Yellow Checker Cab - Clients' WAV taxi round-trip from Scotts Valley to ND for class cert hearing	$260.40

DISBURSEMENTS

Date	Description of Disbursements	Amount
7/1/2024	Adrienne Spiegel- Transportation- Cash tip for car service to drive two named plaintiffs from Santa Cruz to the federal courthouse for the 6/27 hearing	$60.00
7/11/2024	Veritext- Transcription and Translation- Video Services of Witness: Jeanette Algarme, Vol. 2	$508.00
7/11/2024	Veritext- Transcription and Translation- Video Services of Witness: Jeanette Algarme	$508.00
7/17/2024	Douglas J. Cross- Professional Services- Retainer (split with co-counsel)	$2,250.00
7/17/2024	Douglas J. Cross- Professional Services- Professional consulting ane expert witness services covering period July 27, 2022 - May 17, 2024 (split with co-counsel)	$9,107.92
7/19/2024	Ace Attorney Service, Inc.- Professional Services service and attempted service of deposition subpeonas- Customer No. 13574 - Period Ending 7/15/24	$534.27
7/22/2024	Stout Intermediate Holdings, LP- Professional Services- Professional Services rendered by expert Dr. Kennedy (1/2 of total) for May 2024	$3,532.50
7/22/2024	Stout Intermediate Holdings, LP- Professional Services- Professional Services rendered by expert Dr. Kennedy (1/2 of total) for services through October 2023	$12,178.75
7/22/2024	Stout Intermediate Holdings, LP- Professional Services- Professional Services rendered by expert Dr. Kennedy (1/2 of total) through April 2024	$14,136.25
7/22/2024	Stout Intermediate Holdings, LP- Professional Services- Professional Services rendered by expert Dr. Kennedy (1/2 of total) 1/8/24 - 2/9/24	$3,081.25
7/31/2024	Cristina Flores, PhD, RN- Professional Services- Services from 7/8/24 to 7/18/24 (50% of total)	$14,350.00
7/31/2024	Cristina Flores, PhD, RN- Professional Services- Services from 8/9/24 to 8/30/24 (50% of total)	$1,250.00
8/1/2024	Compton Wood Inc- Professional Services- Investigative Services - research re witnesses: Cull locate; DMV check; email to counsel	$425.00
8/1/2024	Facility Access Consulting, Inc- Professional Services- [June 2024 & July 2024] Principal Effort (split 50%).	$1,125.00
9/2/2024	Gary Waters Architectural Corporation DBA Pacific Access Consulting- Professional Services- Accessibility Consulting and Litigation Support Services (50% of services June 5 - August 3, 2024)	$19,766.00
9/5/2024	Alex Barchuk MD Incorporated- Professional Services- Record Review & Consultation	$6,650.00
9/6/2024	Alex Barchuk MD Incorporated- Professional Services- Depo Testimony	$7,500.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
9/11/2024	Facility Access Consulting, Inc- Professional Services- August 2024 Principal Effort (split 50%)	$9,849.55
9/12/2024	Veritext- Transcription and Translation- Transcript Services of Witness: Alex Barchuk	$2,704.35
9/16/2024	Veritext- Transcription and Translation- Transcript Services of Witness: June Isaacson Kailes (split 50%)	$1,130.16
9/16/2024	Veritext- Transcription and Translation- Transcript Services of Witness: Gary Waters (split 50%)	$2,019.87
9/16/2024	Veritext- Transcription and Translation- Transcript Services of Witness: Jeffrey Mastin (split 50%)	$1,506.07
9/17/2024	Veritext- Transcription and Translation- Transcript Services of Witness: Douglas J. Cross (1/2 of total)	$1,889.25
9/19/2024	Transportation- Uber Trip - Travel to Court September 20th -- Hearing on Motion for Miscellaneous Relief	$51.36
9/19/2024	Transportation- Uber Trip - Travel to Court September 20th -- Hearing on Motion for Miscellaneous Relief	$51.55
9/23/2024	MK Litigation Soutions, Inc.- Transcription and Translation- Hearing Transcript	$84.60
9/27/2024	Stout Risius Ross, LLC- Professional Services- Professional Services rendered by expert Dr. Kennedy	$3,170.00
10/5/2024	June Isaacson Kailes- Professional Services- Expert Services June - September 2024 (split 50% with co-counsel)	$7,393.75
10/8/2024	Veritext- Transcription and Translation- Transcript Services of Witness: Dr. Patrick Kennedy (split 50%)	$635.45
10/9/2024	MK Litigation Soutions, Inc.- Transcription and Translation- Proceedings heard before the Honorable Haywood S. Gilliam on 9/19/2024	$4.70
10/11/2024	Facility Access Consulting, Inc- Professional Services- September 2024 Principal Effort (split 50%)	$5,512.50
10/31/2024	Stout Risius Ross, LLC- Professional Services- Professional Services rendered by expert Dr. Kennedy (split 50%)	$2,880.62
10/31/2024	Stout Risius Ross, LLC- Professional Services- Professional Services rendered by expert Dr. Kennedy for 11/6/24 - 11/18/24 (split 50%)	$2,963.75
11/1/2024	KH- Professional Services- Satellite Workplaces - Satellite Workplace annual renewal for use of office space close to Scotts Valley clients for depo and trial prep	$118.21
11/5/2024	Gay Crosthwait Grunfeld- Mileage- Mileage for Visit to named Plaintiff Stacia Stiner at Brookhurst San Ramon (66 @ $0.67)	$44.22
11/5/2024	Gay Crosthwait Grunfeld- Transportation- Bridge Toll for Visit to named Plaintiff Stacia Stiner at Brookhurst San Ramon	$7.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
11/5/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - Carole Presley (Apr 26, 2024) (1/2 of total)	$70.00
11/5/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - NIARE FEASTER (Apr 25, 2024) (1/2 of total)	$113.75
11/5/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - Carole Presley (Apr 26, 2024) (1/2 of total)	$70.00
11/5/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - NIARE FEASTER (Apr 25, 2024) (1/2 of total)	$210.00
11/5/2024	Steno Agency, Inc- Transcription and Translation- Text to Video Sync Hourly Fee - Deposition - NIARE FEASTER (Apr 25, 2024) (1/2 of total)	$113.75
11/8/2024	Esquire Deposition Solutions, LLC- Professional Services- Digital Media - Michael Anthony Johnson 30b6 (half of total)	$345.00
11/11/2024	Transportation- Uber - Trip in connection with Travel to Federal Court (for CMC).	$57.06
11/12/2024	Chopra Litigation Consulting- Professional Services- Jury Consultant (1/2 payment)	$9,235.00
11/13/2024	Transportation- Uber - Trip in connection with Travel to Federal Court (for CMC).	$56.31
11/14/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - Dimple Kamdar (Mar 28, 2024) (split 50%)	$109.37
11/14/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - JENNIFER GORDON-ALVAREZ (Apr 19, 2024) (split 50%)	$105.00
11/14/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - DOUGLAS JAY ANDERSON - VOL II (Sep 25, 2024) (split 50%)	$35.00
11/14/2024	Steno Agency, Inc- Transcription and Translation- Legal Support Services (Video) - Deposition - DOUGLAS JAY ANDERSON (Sep 24, 2024) (split 50%)	$175.00
11/27/2024	CVisualEvidence LLC- Professional Services- Trial Demonstrative Evidence Video (split 50%)	$670.00
12/5/2024	Steno Agency, Inc- Transcription and Translation- Text to Video Sync Hourly Fee - Deposition - JOSH ALLEN (Sep 4, 2024)	$210.00
12/11/2024	U.S. Legal Support, Inc- Transcription and Translation- Videography Services of Kimia Ataein (50%)	$888.12

DISBURSEMENTS

Date	Description of Disbursements	Amount
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Jeffrey Mastin (split 50%)	$419.00
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Jeffrey S. Mastin (split 50%)	$744.00
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Douglas J Cross (split 50%)	$831.50
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Patricia Lindstrom (split 50%)	$744.00
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Jeanette Algarme (split 50%)	$674.00
12/11/2024	Veritext- Transcription and Translation- Video Services - Witness: Bernie Jestrabek-Hart (split 50%)	$656.50
12/12/2024	Veritext- Transcription and Translation- Video Services - Witness: Stacia Stiner (split 50%)	$831.50
12/12/2024	Veritext- Transcription and Translation- Video Services - Witness: Jeanette Algarme, Vol 2 (split 50%)	$674.00
12/12/2024	Veritext- Transcription and Translation- Video Services - Witness: Douglas J. Cross (split 50%)	$1,146.50
12/12/2024	Veritext- Transcription and Translation- Video Services - Witness: Douglas Cross, Vol II (split 50%)	$359.00
12/12/2024	Veritext- Transcription and Translation- Video Services - Witness: Stacia Stiner (split 50%)	$516.50
12/14/2024	Transportation- SFMTA - Sutter Stockton Garage | Parking re: Mock Trial.	$38.00
12/17/2024	Raynee Mercado, CSR RMR CRR FCRR CCRR- Transcription and Translation- 2/17/24 PTC hearing	$148.75
12/18/2024	Transportation- Uber - Trip for Pre-Trial Conference (ALL TEAM MEMBERS).	$122.07
12/18/2024	Transportation- Uber - Trip for the Team to Return to the Firm after the Pre-Trial Conference.	$52.96
12/19/2024	Veritext- Transcription and Translation- Video Services - Witness: Rita Stiner (split 50%)	$294.00
1/4/2025	Gay Crosthwait Grunfeld- Travel- United Airlines - Economy Flight to Santa Ana for meeting with client.	$172.00
1/7/2025	Envision Litigation Design, Inc.- Professional Services- Trial Demonstratives	$8,889.94
1/9/2025	Gay Crosthwait Grunfeld- Transportation- $40 Tip - For Para-Transit Driver for Trip to Brookhurst with to "Name Plaintiff".	$40.00
1/9/2025	Transportation- RideYellow - Taxi for Travel in Santa Ana with Client.	$66.70

DISBURSEMENTS

Date	Description of Disbursements	Amount
1/9/2025	Transportation- Uber - Trip for Travel in Connection with Visit to Named Plaintiff & her Former Facility.	$39.00
1/9/2025	Meals- - Breakfast re: Travel to Santa Ana, CA. for meeting with Client.	$15.71
1/9/2025	Transportation- Curb Svc. - Taxi Curb Svc. - Taxi re: Travel to Santa Ana, CA. for meeting with Client.	$81.78
1/10/2025	Meals- - Dinner re: Travel to Santa Ana, CA. for meeting with Client.	$14.54
1/10/2025	Transportation- Travel in Connection to Brookhurst with the Named Plaintiff.	$151.55
1/14/2025	Darcy Edmundson- Transportation- Lyft - Ride for DLE, AHS, & KES, Returning from Courthouse for Pre-Trial Conference.	$29.70
1/14/2025	Facility Access Consulting, Inc- Professional Services- October - December 2024 Principal Effort (split 50%)	$4,331.25
1/15/2025	Raynee Mercado, CSR RMR CRR FCRR CCRR- Transcription and Translation- 1/14/25 PTC hearing	$114.75
1/15/2025	Transportation- Uber - (Transportation) Trip Back from Pre-Trial Conference.	$52.47
1/15/2025	Transportation- Uber - (Transportation) Trip to Pre-Trial Conference for RBGG Team of 6.	$121.95
1/16/2025	United Litigation Discovery- Outside Copying and Scanning- Stamp & Print	$3,959.07
1/17/2025	U.S. Legal Support, Inc- Transcription and Translation- Certified Transcript of Kimia Ataein (50%)	$890.45
1/22/2025	Transportation- Uber - (Transportation) $10 Tip for the Trip Back from Pre-Trial Conference.	$10.00
1/28/2025	Compton Wood Inc- Professional Services- Investigative Services - re trial witnesses (split 50%)	$300.00
1/31/2025	Inhouse Postage	$393.08
2/4/2025	CVisualEvidence LLC- Professional Services- Video Production & Editing services in January for trial demonstratives (split 50%)	$450.00
3/5/2025	Chopra Litigation Consulting- Professional Services- Jury Consultation	$9,946.03
4/14/2025	Chopra Litigation Consulting- Professional Services- Jury Consultation	$4,617.50
4/30/2025	In-house Copying and Printing (46255 @ $0.20)	$9,251.00
5/10/2025	Transcription and Translation	$138.50
5/13/2025	Outside Postage and Delivery	$2,049.33
5/13/2025	Pacer Charges (41 @ $18.41)	$754.90
5/28/2025	Westlaw research (150 @$259.36)	$38,904.26

DISBURSEMENTS

Date	Description of Disbursements	Amount
	Total Disbursements	$1,116,924.97

Total Professional Services	$12,257,770.50	
Billing Judgment Reductions	*($235,924.50)*	
Total Professional Services Due	$12,021,846.00	
Total Disbursements Due	$1,116,924.97	
Total Current Charges		$13,138,770.97
Less 10% Additional Across The Board Reduction		*($1,202,184.60)*
AMOUNT DUE		**$11,936,586.37**

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

EXHIBIT Y

ROSEN BIEN
GALVAN & GRUNFELD LLP

101 Mission St. 6th Floor
San Francisco, California 94105
Telephone: (415) 433-6830 Fax: (415) 433-7104
FEIN: 94-3136812
www.rbgg.com
Gay C. Grunfeld
Email: ggrunfeld@rbgg.com

Brookdale Residents

August 05, 2025
Client: 001457
Matter: 000006
Invoice #: 19760
Resp. Atty: GCG
Page: 1

RE: Fees Work

For Professional Services Rendered Through July 15, 2025

ACC0UNT SUMMARY

Matter	Description	Fees	Expenses	Billing Judgment Reductions	Total Due
000006	Fees Work	$222,335.50	$0.00	($11,770.00)	$210,565.50
		Less 10% Additional Across The Board Reduction			*($21,056.55)*
		AMOUNT DUE			**$189,508.95**

Courtesy Discount is of "gross" hours worked **14.76 %**

ROSEN BIEN GALVAN & GRUNFELD LLP

101 Mission St. 6th Floor
San Francisco, California 94105
Telephone: (415) 433-6830 Fax: (415) 433-7104
FEIN: 94-3136812
www.rbgg.com

Brookdale Residents

August 05, 2025
Client: 001457
Matter: 000006
Invoice #: 19760
Resp. Atty: GCG
Page: 1

RE: Fees Work

For Professional Services Rendered Through July 15, 2025

SERVICES

Date	Person	Description of Services	Hours	Discount
1/17/2025	GCG	Emails JSY re fees petition issues.	0.2	
1/20/2025	JSY	Conf. w/ GCG re fees petition.	0.1	
1/21/2025	GCG	(Billing Judgment) Set up fees matter.	0.0	0.2
1/21/2025	GCG	Conf with partners and emails 4L re vetting time.	0.2	
1/21/2025	JSY	Conf and emails re starting work on fees petition.	0.2	
1/21/2025	JSY	(Billing Judgment) Prepare memo re fees issues.	0.0	1.3
1/22/2025	GCG	Begin reviewing RBGG time entries for fee petition.	0.2	
1/22/2025	JSY	Emails re starting fees petition.	0.1	
1/22/2025	VS	Emails w/ GCG and JSY re vetting time.	0.2	
1/23/2025	GCG	Draft memo to file re time vetting for fee petition.	0.5	
1/23/2025	GCG	Meet with SJR, VS and JSY to discuss same.	0.7	
1/23/2025	GCG	Review briefs regarding partial success.	0.7	
1/23/2025	GCG	Email GW re same.	0.1	
1/23/2025	JSY	Meeting re fees petition.	0.8	
1/23/2025	JSY	Emails re fees petition.	0.2	
1/23/2025	JSY	Conf w/ GCG re fees issues.	0.2	
1/23/2025	SJR	(Reduced Charge) Emails and Zoom with GG, JY, VS re fee claim.	0.8	0.1

SERVICES

Date	Person	Description of Services	Hours	Discount
1/23/2025	VS	Meeting w/ GCG, SJR, and JSY re time records and fees motion.	0.7	
1/23/2025	KES	Gather examples of fee petitions from other cases and through Pacer.	0.6	
1/24/2025	GCG	Meet with JSY to discuss review and redaction of time entries.	0.5	
1/24/2025	GCG	Conf with AS and email JSY-GW re legal research re district court's approach to fees motions.	0.2	
1/24/2025	JSY	Meeting with GCG re vetting fees.	0.5	
1/24/2025	JSY	Conf. w/ GCG re issue with billing rates.	0.1	
1/24/2025	JSY	Emails re research re fees orders from Judge G.	0.2	
1/24/2025	JSY	Draft email re fees issues.	0.6	
1/24/2025	JSY	Review and edit time records; emails re same.	1.0	
1/24/2025	JSY	Emails re issues with billing rates.	0.1	
1/24/2025	SJR	(Billing Judgment) Conference with GG re vetting time.	0.0	0.2
1/24/2025	SJR	Emails with JY and GG re fees motion.	0.2	
1/24/2025	AHS	Discussed attorneys' fees in settlement agreements with GCG and emailed co-counsel re same.	0.3	
1/26/2025	GCG	Review JSY edits to RBGG time.	0.2	
1/27/2025	GCG	Conf with and email JSY re redacting RBGG time and updated pre-bill.	0.2	
1/27/2025	JSY	Review and edit time records.	0.4	
1/27/2025	JSY	Conf. w/ GCG re fees issues.	0.1	
1/27/2025	JSY	Vet time for fee motion.	1.5	
1/28/2025	GCG	Conf with JSY re redactions to RBGG time entries.	0.1	
1/28/2025	JSY	Review and edit time records for fee petition.	1.6	
1/28/2025	JSY	Conf. w/ GCG re fees records review.	0.1	
1/30/2025	GCG	Conf with JSY re redactions to RBGG time entries.	0.1	
1/30/2025	JSY	Conf. w/ GCG re fees petition and reviewing time.	0.1	
1/30/2025	JSY	Review and edit time records.	2.0	
1/31/2025	JSY	Review and edit time records.	0.9	
2/1/2025	GCG	Email JSY re redacting time.	0.1	
2/1/2025	GCG	Review GW time and costs.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/1/2025	JSY	(Billing Judgment) Emails re reviewing time records.	0.0	0.1
2/3/2025	JSY	Emails re edits to fee records.	0.2	
2/5/2025	GCG	Email with JSY re fees redaction and analysis.	0.1	
2/5/2025	JSY	(Billing Judgment) Conf. with MWB and LAE re settlement and fees issues.	0.0	0.5
2/5/2025	JSY	Review and edit fees records and review co-counsel fee records.	0.6	
2/5/2025	MWB	(Billing Judgment) Conference with JY re fees issues.	0.0	0.4
2/6/2025	GCG	Conf with and emails JSY re same and re attempt to settle fees.	0.4	
2/6/2025	GCG	Zoom meet with MWB, SJR and JSY re fees offer.	0.3	
2/6/2025	GCG	Email with Judge Spero re same.	0.1	
2/6/2025	GCG	Zoom meeting with GW and KS re fees proposal.	0.3	
2/6/2025	GCG	Email DM and GK re invoices.	0.1	
2/6/2025	JSY	Meeting with GCG, SJR, MWB re fees issues.	0.4	
2/6/2025	JSY	Review fees and analyze fees issues; emails re same.	1.0	
2/6/2025	JSY	Conf. w/ GCG re fee petition.	0.1	
2/6/2025	JSY	(Billing Judgment) Conf. w/ LAE re fee petition issues.	0.0	0.2
2/6/2025	JSY	Review and edit time records; analyze fees issues; emails re same.	2.0	
2/6/2025	MWB	(Reduced Charge) Emails and Zoom call with GCG, JY, SJR re fees negotiations and strategy.	0.4	0.4
2/6/2025	SJR	(Reduced Charge) Emails with JY, GG, MWB re negotiations.	0.1	0.4
2/6/2025	SJR	Zoom with JY, GG, MWB.	0.5	
2/6/2025	SJR	Additional emails and data.	0.2	
2/7/2025	GCG	Prepare for and conduct Zoom meeting with TG and GW re attorney fees.	0.4	
2/7/2025	GCG	Emails TG-GW-JSY re same.	0.2	
2/7/2025	GCG	Conf with MWB re same.	0.2	
2/7/2025	JSY	Conf. w/ GCG re fees issues and motion.	0.3	
2/7/2025	JSY	Research re fees issues; emails re same.	0.7	
2/7/2025	JSY	Draft memo re fees motions issues; emails re same.	0.6	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/7/2025	MWB	Conference with GCG re strategy and fees negotiations.	0.2	
2/7/2025	SJR	Conference with GG re fees.	0.2	
2/10/2025	GCG	Review and redact RBGG time entries.	0.3	
2/10/2025	JSY	Review and edit time records.	1.0	
2/10/2025	AHS	Drafted Memo re HSG's approach to fee motions.	1.2	
2/11/2025	GCG	Conference with JSY re vetting time.	0.1	
2/11/2025	JSY	Emails re memo re Gilliam fees orders; review same.	0.3	
2/11/2025	AHS	Conducted legal research on contested fee petitions before Judge Gilliam.	3.1	
2/12/2025	JSY	Review and edit time entries.	0.8	
2/13/2025	GCG	Review and redact RBGG 2017 time.	0.9	
2/13/2025	JSY	Conf. w/ KES re issues with costs for transcripts.	0.1	
2/13/2025	JSY	Review and edit time records.	0.5	
2/14/2025	GCG	Review and redact RBGG 2017 time entries.	1.2	
2/14/2025	GCG	Emails JSY re resumes for motion and revisions needed to time runs.	0.2	
2/14/2025	JSY	Conf. w/ GCG re fees issues.	0.2	
2/14/2025	JSY	Emails re resumes for fees motion and other fees issues.	0.2	
2/14/2025	JSY	Review and edit time entries; emails re same.	0.2	
2/14/2025	KC	Prepare GCG edits to prebill and draft email to KA re same.	0.4	
2/14/2025	KC	Review GCG edits to prebill and draft email to KA re same.	0.2	
2/15/2025	GCG	Review and redact RBGG time entries.	0.4	
2/16/2025	GCG	Review and redact RBGG 2019 time entries.	0.2	
2/17/2025	GCG	Review and redact RBGG 2017 and 2019 time entries.	1.1	
2/18/2025	GCG	Review and redact RBGG 2019 appellate time.	0.2	
2/18/2025	KC	Review and scan GCG edits to prebills.	0.3	
2/19/2025	GCG	Conf with JY and KC re appellate time entries.	0.1	
2/19/2025	JSY	Conf. w/ GCG re fees issues and editing time records.	0.2	
2/19/2025	KC	Confer with JSY and GCG re time entries on prebills.	0.2	
2/19/2025	KC	Review GCG edits to 2017 time entries and draft email to 4L re same.	0.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
2/20/2025	GCG	Review and redact RBGG appellate time.	0.1	
2/20/2025	JSY	Review and edit time entries.	0.9	
2/23/2025	GCG	Review and redact RBGG 2019 time entries.	0.7	
2/24/2025	GCG	Conf with JSY and KC re 2019 time redaction.	0.2	
2/24/2025	GCG	Review and redact same.	0.2	
2/24/2025	GCG	Email TG-GW re attorney's fees.	0.2	
2/24/2025	JSY	Conf. w/ GCG re fees petition and reviewing fees records; research re same.	0.5	
2/24/2025	JSY	Review and edit fees records.	0.5	
2/25/2025	JSY	Edit fees records; multiple emails and conf. re same.	2.3	
2/26/2025	JSY	Review and edit time records.	0.5	
2/27/2025	JSY	Review and edit fees records.	0.2	
2/28/2025	JSY	Conf. w/ GCG re fees issues.	0.1	
2/28/2025	JSY	Review and edit time records.	1.2	
3/2/2025	GCG	Review and redact RBGG 2019 time entries.	0.4	
3/3/2025	GCG	Email JSY re vetting costs.	0.1	
3/3/2025	GCG	Review and redact RBGG 2019 time.	0.1	
3/4/2025	JSY	Emails re editing fees records.	0.1	
3/4/2025	KC	(Billing Judgment) Scan additional pages of edits by GCG to 2019 time entries and draft email to KA re same.	0.0	0.6
3/4/2025	KC	Review edits to 2017 time entries.	1.4	
3/5/2025	GCG	Meet with TG and GW re fees.	0.3	
3/5/2025	GCG	Confs with GW and JSY and emails GW-Judge Spero re same.	0.5	
3/5/2025	KC	Continue reviewing edits to 2017 time entries.	1.3	
3/6/2025	GCG	Confs with Judge Spero re fees negotiation.	0.3	
3/6/2025	GCG	Confs with GW and emails team and MWB, JSY and SJR re same.	0.5	
3/6/2025	GCG	Draft and send email to TG re fees settlement.	0.1	
3/6/2025	JSY	Conf. w/ GCG two times re fees negotiations.	0.2	
3/6/2025	JSY	Emails re fees negotiation.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/6/2025	JSY	(Billing Judgment) Research payments for mock trial and emails re same.	0.0	0.2
3/6/2025	SJR	Emails among GG, MWB, JY and SJR re negotiations.	0.4	
3/6/2025	KC	Continue review of 2017 updated time entries.	2.3	
3/6/2025	KC	Continue review of updated time entries for 2017.	1.7	
3/7/2025	GCG	Review and redact RBGG 2019 time entries.	0.5	
3/7/2025	JSY	Conf. w/ LAE re settlement and fees.	0.1	
3/7/2025	JSY	(Billing Judgment) Emails re fees settlement issues.	0.0	0.2
3/7/2025	JSY	Review memo re Gilliam fees decisions; emails re same.	0.2	
3/7/2025	JSY	Review and edit time records.	1.9	
3/7/2025	LAE	(Billing Judgment) Conf with JSY re fees issues and strategy.	0.0	0.1
3/7/2025	AHS	Legal research for motion for preliminary approval.	1.4	
3/10/2025	GCG	Continued review and redaction of RBGG 2019 time.	0.3	
3/10/2025	KC	(Billing Judgment) Scan GCG edits to 2019 time entries.	0.0	0.2
3/12/2025	JSY	Review and edit time records; conf. w/ GCG, KC, KES re same.	2.1	
3/12/2025	KC	(Billing Judgment) Scan JSY edits to 2022 time entries and draft email to KA, GCG, JSY re same.	0.0	0.8
3/12/2025	KC	(Billing Judgment) Scan GCG edits to remaining 2019 time entries and draft email to KA, GCG, JSY re same.	0.0	0.4
3/14/2025	KC	(Billing Judgment) Print and deliver time entries from 2021 to GCG.	0.0	0.3
3/17/2025	GCG	Conf with JSY re fee petition.	0.1	
3/17/2025	SJR	Emails re fees motion.	0.3	
3/20/2025	GCG	Review documents; plan fee petition.	0.2	
3/20/2025	GCG	Emails GW re contemporaneous time notes and plan for motion.	0.2	
3/20/2025	GCG	Conf with JSY re same.	0.1	
3/20/2025	GCG	Begin drafting Grunfeld declaration.	0.5	
3/20/2025	GCG	Email BBK-JSY re same.	0.1	
3/20/2025	GCG	Review and redact RBGG 2021 time.	0.3	
3/20/2025	JSY	Emails and conf. re fees motion with GCG.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/20/2025	JSY	(Billing Judgment) Conf. w/ LAE re issues for fees motion.	0.0	0.3
3/20/2025	JSY	Review and edit time records; emails re same.	1.5	
3/20/2025	SJR	(Billing Judgment) Several emails re fee motion.	0.0	0.4
3/21/2025	GCG	Email BBK-JSY re Grunfeld declaration.	0.1	
3/21/2025	JSY	Emails re outstanding costs.	0.1	
3/21/2025	JSY	Emails re decl supporting fees motion.	0.1	
3/21/2025	JSY	Review and edit time records.	1.0	
3/22/2025	GCG	Review and redact RBGG 2021 time entries.	1.2	
3/23/2025	GCG	Review and redact RBGG 2021 time entries.	0.5	
3/23/2025	GCG	Email JSY and BBK re summary for GCG declaration.	0.1	
3/24/2025	GCG	Meet with JSY and BBK to plan Grunfeld declaration and vetting of time.	0.5	
3/24/2025	GCG	Conf with KC and emails re revisions to time entries.	0.1	
3/24/2025	GCG	Attend to invoices and costs.	0.1	
3/24/2025	GCG	Email GW re fee application.	0.1	
3/24/2025	JSY	(Reduced Charge) Meeting with GCG and BBK re fees motion and declaration.	0.5	0.1
3/24/2025	JSY	Emails re meeting re GCG declaration and fees motion.	0.1	
3/24/2025	BBK	Meeting w/ GCG and JSY re fees petition.	0.5	
3/24/2025	KC	Continue review of 2017 edits.	1.9	
3/24/2025	KC	Finalize edits to 2017 time entries and draft email to KA, JSY, and GCG re same.	0.3	
3/24/2025	KC	Begin review of updated time entries for 2018.	1.9	
3/24/2025	KC	Review edits to 2019 time entries in 1457-3.	0.4	
3/24/2025	KC	Draft email to KA, JSY, and GCG re completed review of 2019 time entries.	0.2	
3/25/2025	GCG	Attend to outstanding invoices and email SC and GW re same.	0.2	
3/25/2025	GCG	Email GW re declaration and 2025 notes.	0.2	
3/25/2025	JSY	Conf. w/ KC re edits to fees entries.	0.2	
3/25/2025	BBK	Emails w/ GCG and GW re fees petition and expert declaration for same.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/25/2025	KES	(Billing Judgment) Review court reporter invoice and past charges and tc to court reporter re same to clarify charges correct for 2021 depo.	0.0	0.4
3/25/2025	KES	Email GCG re consultant retainer.	0.1	
3/25/2025	KC	Confer with JSY re edits to 2018 time entries.	0.1	
3/25/2025	KC	Review JSY edits to 2018 time.	0.1	
3/25/2025	KC	Review JSY edits to 2018 time entries.	3.4	
3/25/2025	KC	Confer with JSY re: time entry edits and make corrections.	0.3	
3/25/2025	KC	Review edits to 2018 time entries and draft email to KA, JSY, and GCG re same.	0.4	
3/26/2025	GCG	(Billing Judgment) Review and pay costs.	0.0	0.2
3/26/2025	GCG	(Billing Judgment) Emails SW and vendors re same.	0.0	0.1
3/26/2025	GCG	Conf with JSY re redaction of time entries and time frame for fees petition.	0.1	
3/26/2025	JSY	Review and edit time records; conf. w/ GCG and KC re same.	2.4	
3/26/2025	JSY	Conf. w/ GCG re costs issues.	0.1	
3/26/2025	JSY	Conf. w/ KES re costs issues.	0.1	
3/26/2025	BBK	Conferring w/ JSY and GCG re drafting GCG Decl ISO Fees Petition.	0.1	
3/26/2025	KES	(Billing Judgment) Tc with US Legal to confirm recent charges for 2021 depo transcript correct; email team re same.	0.0	0.5
3/26/2025	KES	(Billing Judgment) Review Steno account summary to confirm outstanding depo-related charges.	0.0	0.1
3/26/2025	KC	Review JSY edits to 2024 Jan-Jun time entries draft email to KA, JSY, GCG re same.	1.1	
3/27/2025	GCG	Review and redact RBGG 2021 time entries.	0.6	
3/27/2025	GCG	Confs with and emails JSY and KES re RBGG costs and fee application.	0.2	
3/27/2025	JSY	Review and edit time records; emails re same.	2.3	
3/28/2025	JSY	Review and edit time records.	1.1	
3/28/2025	BBK	Planning/preparing GCG Decl ISO Fees Petition.	1.4	
3/28/2025	KC	Review GCG edits to time entries in 2017 and Jan-May 2021.	0.6	
3/28/2025	KC	Review 2023 time entries.	0.4	
3/29/2025	GCG	Review and redact RBGG 2021 time entries.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
3/30/2025	GCG	Review and redact RBGG 2021 time entries.	1.7	
3/31/2025	GCG	Email JSY-team re redaction of time records to avoid sealed information.	0.2	
3/31/2025	GCG	Emails re consolidation of cost bill for review and submission to court.	0.2	
3/31/2025	GCG	Review and redact 2021 time entries.	0.5	
3/31/2025	GCG	Initial review cost bill.	0.1	
3/31/2025	GCG	Conf with JSY re redaction issues.	0.1	
3/31/2025	JSY	(Billing Judgment) Conf. w/ MLF re fees motion.	0.0	0.1
3/31/2025	JSY	Review and edit time records; multiple emails re same.	3.3	
3/31/2025	JSY	Conf. w/ GCG re editing time records and fee motion.	0.2	
3/31/2025	BBK	Emails w/ JSY and GCG re redactions to time records; analysis of fees records.	0.1	
3/31/2025	BBK	Drafting GCG decl ISO fees application.	4.0	
3/31/2025	KES	Review RBGG draft cost bill and suggest edits and billing judgments in connection with motion for attorneys fees and costs.	2.3	
4/1/2025	GCG	Review and redact RBGG 2021 time entries.	1.5	
4/1/2025	GCG	Conf with KES re cost issues.	0.1	
4/1/2025	GCG	Email GW re same.	0.1	
4/1/2025	GCG	Conf with JSY and email BBK-team re Grunfeld declaration and redactions to time.	0.2	
4/1/2025	JSY	Conf. w/ GCG re editing fees records.	0.1	
4/1/2025	JSY	2nd Conf. w/ GCG re editing fees records.	0.1	
4/1/2025	JSY	(Billing Judgment) Conf. w/ CM and KC re editing fees records.	0.0	0.2
4/1/2025	JSY	Emails and messages re GCG decl.	0.2	
4/1/2025	JSY	Edit fees records.	2.4	
4/1/2025	JSY	Review and edit time records; emails and conf. re same.	0.4	
4/1/2025	BBK	Conferring w/ JSY re draft GCG Decl ISO Fees Petition.	0.2	
4/1/2025	BBK	Drafting GCG Decl ISO Fees Petition.	3.5	
4/1/2025	BBK	Emailing w/ GCG re preparing decl ISO fees petition and analysis of costs.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/1/2025	KES	Create chart of costs and investigate issues.	3.2	
4/1/2025	KC	(Billing Judgment) Coordinate with CM and JSY re messenger pickup and drop-off.	0.0	0.2
4/1/2025	KC	(Billing Judgment) Email JSY and CM re receipt of package from messenger.	0.0	0.1
4/1/2025	KC	Review JSY edits to 2nd half of 2024 and 2025 email re same.	2.2	
4/1/2025	KC	Review GCG edits to Aug-Sep 2021 time entries, email re same.	0.7	
4/2/2025	GCG	Review and redact RBGG 2023 time entries.	0.7	
4/2/2025	GCG	Conf with JSY and KES re same and re Cost bill.	0.3	
4/2/2025	GCG	Redact cost bill.	0.2	
4/2/2025	GCG	Emails SW-KES re same.	0.1	
4/2/2025	JSY	Conf. w/ GCG re fees motion issues and vetting fees and costs; conf. w/ KC re same.	0.5	
4/2/2025	JSY	Review and edit fees entries; emails re same.	1.0	
4/2/2025	JSY	Review and edit time records; emails and conf re same.	0.6	
4/2/2025	BBK	Emails w/ GCG/JSY/KES re bill of costs for fees petition.	0.1	
4/2/2025	KES	Follow up re cost issues for fees motion.	0.9	
4/2/2025	KC	Review JSY and GCG edits to time entries and draft email to 4L re same.	0.8	
4/2/2025	KC	Review JSY edits to 2023 time entries for July 1 to Nov 28.	0.4	
4/3/2025	GCG	Review and redact RBGG 2023 time.	0.3	
4/3/2025	GCG	Conf with JSY re key areas of confidentiality and redaction.	0.2	
4/3/2025	GCG	Conf with KES and email SW re cost bill.	0.1	
4/3/2025	GCG	Conf with KC re vetting time.	0.2	
4/3/2025	JSY	Conf. w/ GCG, KES, KC re fees and costs review for motion.	0.2	
4/3/2025	JSY	Review and edit time records; multiple emails and conf. re same.	0.9	
4/3/2025	JSY	Conf. w/ BBK re GCG decl ISO fees motion.	0.3	
4/3/2025	JSY	Conf. w/ KC re preparing fees records.	0.1	
4/3/2025	JSY	Emails re preparing fees records.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/3/2025	BBK	Emailing w/ JSY/GCG/KC re preparing time records for fees petition.	0.1	
4/3/2025	BBK	Meeting w/ JSY re fees petition and hearing re: preliminary approval of class settlement.	0.3	
4/3/2025	BBK	Revising GCG Decl ISO Fees Petition per JSY meeting.	0.2	
4/3/2025	KES	Revise comments on RBGG cost bill and email re edits to same.	2.3	
4/3/2025	KC	Review remainder of 2023 prebill.	0.5	
4/3/2025	KC	Review JSY edits to March 2025 prebill.	0.4	
4/3/2025	KC	(Billing Judgment) Compile list re status of prebills by year and matter no. and draft email to GCG and JSY re same.	0.0	1.3
4/3/2025	KC	Confer with JSY re status of reviewing time records.	0.2	
4/4/2025	BBK	Preparing GCG Decl ISO Fees Motion.	2.3	
4/7/2025	GCG	Emails and conf re vetting time and costs.	0.1	
4/7/2025	JSY	Emails re meeting to discuss fees motion issues.	0.2	
4/7/2025	JSY	Emails re fees motion issues.	0.1	
4/7/2025	MWB	Emails JY-SJR re fees strategy.	0.1	
4/7/2025	SJR	Numerous emails with GG, JY, MWB re next steps.	0.3	
4/7/2025	BBK	Researching/drafting GCG Decl ISO Fees Petition.	2.6	
4/8/2025	GCG	Conf with JSY; emails SJR-MWB re meeting to discuss application.	0.1	
4/8/2025	JSY	Work on fees analysis; emails re same.	1.0	
4/8/2025	SJR	(Billing Judgment) Emails re consultation.	0.0	0.4
4/9/2025	GCG	Prepare for meeting with SJR, MWB and JSY.	0.1	
4/9/2025	JSY	Emails re fees edits.	0.1	
4/9/2025	SJR	(Billing Judgment) Email from GCG.	0.0	0.2
4/10/2025	GCG	Prepare for and conduct meeting with SJR, MWB and JSY re fees petition and strategy.	0.8	
4/10/2025	GCG	Emails GW-JSY re fee petition.	0.2	
4/10/2025	GCG	Emails re revisions to time entries.	0.2	
4/10/2025	JSY	Emails re edits to fees records.	0.2	
4/10/2025	JSY	Meeting re fees issues with GCG, SJR, MWB.	0.5	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/10/2025	JSY	Prepare for meeting re fees.	0.2	
4/10/2025	JSY	Conf w/ GCG re status.	0.1	
4/10/2025	JSY	Emails re status of reviewing fees.	0.3	
4/10/2025	MWB	Prepare for and meeting with JY, GCG, SJR re strategy.	0.6	
4/10/2025	SJR	(Reduced Charge) Preparation for and Zoom call with GG, JY, MWB re next steps.	0.6	0.5
4/10/2025	BBK	Reviewing emails w/ RBGG team re preparing time sheets for fees petition; email to GW re timing of exchanging drafts of GCG Decl and Fees Motion.	0.1	
4/10/2025	KC	Second pass review of 1457-4, 1457-5 and 1457-6.	1.3	
4/10/2025	KC	Second pass review of 2017 updated time and draft email re same.	2.7	
4/10/2025	KC	Second pass review of 2018 updated time and draft email re same.	0.9	
4/10/2025	KC	Second pass review of 2019 updated time and draft email re same.	2.0	
4/11/2025	GCG	Confs with JSY and KC re fee petition declaration.	0.2	
4/11/2025	JSY	((Billing Judgment) Conf w/ MWB and LAE re fees issues.	0.0	0.3
4/11/2025	JSY	Conf w/ GCG and BBK re fees motion and declaration.	0.2	
4/11/2025	BBK	Preparing GCG Decl ISO Fees Petition.	1.0	
4/11/2025	BBK	Meeting w/ JSY re GCG Decl ISO Fees Petition.	0.1	
4/11/2025	KC	Second pass review of 2023 updated time and draft email re same.	1.8	
4/11/2025	KC	Update status re second pass review of time entries.	0.3	
4/14/2025	GCG	Meet with co-counseling team re timing and content of fee petition.	0.5	
4/14/2025	GCG	Conf with JSY and emails SW re costs issues.	0.3	
4/14/2025	GCG	Email JSY-BBK re plan for Grunfeld declaration.	0.1	
4/14/2025	JSY	Meeting with co counsel re fees motion; emails re same.	0.5	
4/14/2025	JSY	Conf. w/ GCG re fees motion.	0.1	
4/14/2025	JSY	Emails re GCG declaration re fees.	0.1	
4/14/2025	JSY	Multiple emails and conf. re outstanding costs payments.	0.3	
4/14/2025	SJR	(Billing Judgment) Emails re status.	0.0	0.2

SERVICES

Date	Person	Description of Services	Hours	Discount
4/14/2025	BBK	Emailing w/ JSY re plan for filing fees petition and exchanging drafts w/ co-counsel.	0.1	
4/14/2025	BBK	Researching and preparing GCG Decl ISO Fees Petition.	3.7	
4/15/2025	GCG	Conf with KES re cost invoice for fee petition.	0.1	
4/15/2025	BBK	Conferring w/ KES re plan for fees petition.	0.1	
4/15/2025	BBK	Researching and drafting GCG Decl ISO Fees Petition.	3.3	
4/15/2025	KES	Follow up re edits to cost bill.	0.1	
4/16/2025	GCG	Conf with KES re costs bill.	0.1	
4/16/2025	GCG	Email GW and team re same.	0.1	
4/16/2025	BBK	Drafting/researching GCG Decl ISO Fees Petition.	1.3	
4/16/2025	KES	Review edits to cost bill and suggest further edits.	0.5	
4/18/2025	KC	Second pass review of 2020 time entries.	2.3	
4/21/2025	GCG	Conf with KC and email JSY-team re revisions to time entries and cost bill.	0.1	
4/21/2025	GCG	(Billing Judgment) Attend to Chopra payment.	0.0	0.1
4/21/2025	BBK	Researching and drafting GCG Decl ISO Fees Petition.	8.6	
4/21/2025	KC	Continue review of updated time for 2020 and draft email re same.	1.3	
4/21/2025	KC	Second pass review of 2021 time.	3.1	
4/21/2025	KC	Emails re edits to 1-1-2021 to 8-8-2021 time entries.	0.5	
4/22/2025	GCG	Review and redact RBGG time entries.	0.2	
4/22/2025	GCG	Confs w/KS and KES and email MJ-JSY and 4L re revisions to time and costs.	0.2	
4/22/2025	BBK	Emailing w/ GCG re declaration ISO fees petition.	0.1	
4/22/2025	BBK	Emails w/ RBGG team and co-counsel re presenting costs to court in fees petition.	0.1	
4/22/2025	KES	Confer GCG re RBGG cost bill.	0.3	
4/22/2025	KES	Make further edits to draft cost bill.	0.9	
4/22/2025	KC	Continue second pass review of remainder of 2021 time and draft email re same.	1.8	
4/23/2025	GCG	Conf with JSY and email MJ-team re using receipts to support cost bill.	0.2	
4/23/2025	GCG	Conf with BBK re Grunfeld declaration.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/23/2025	JSY	Two conf. w/ GCG re documentation of costs for fees motion.	0.3	
4/23/2025	JSY	Conf. w/ BBK re GCG decl ISO fees motion.	0.2	
4/23/2025	JSY	Emails re costs substantiation.	0.1	
4/23/2025	JSY	Emails re costs.	0.1	
4/23/2025	BBK	Meeting w/ JSY re GCG Decl ISO Fees Petition; conferring w/ GCG re same.	0.2	
4/23/2025	BBK	Emailing w/ JSY/GCG/KES re submitting costs to court w/ fees petition.	0.1	
4/23/2025	KES	Emails re need for costs backup.	0.2	
4/23/2025	KC	Second pass review of updated 2022 time entries.	1.2	
4/24/2025	JSY	Multiple conf. and emails re invoices for costs substantiation.	0.4	
4/24/2025	KES	Review RBGG cost backup and organize invoices by proposed motion categories.	2.8	
4/24/2025	KES	Consider additional cost categories for fees motion and email JY re same.	0.4	
4/24/2025	KC	Continue second pass review of 2022 updated time.	2.6	
4/25/2025	JSY	Emails re costs categories.	0.2	
4/25/2025	KES	Further review and organization of cost backup.	0.7	
4/25/2025	KC	Second pass review of updated time for 1.1.24 to 6.30.24 and draft email re same.	4.1	
4/28/2025	KES	Redact RBGG cost backup.	1.5	
4/28/2025	KC	Continue second pass review of 2024 updated time and email re same.	3.3	
4/29/2025	JSY	Multiple conf. w/ KES and KC re supporting documentation for GCG decl. ISO fees; review same.	0.5	
4/29/2025	KES	Review excel of cost prebill and investigate discrepancies; begin organization by category.	1.6	
4/29/2025	KES	Review and redact costs backup - compare duplicates.	0.9	
4/29/2025	KC	Review and respond to email re 2024 billing adjustments.	0.2	
4/29/2025	KC	Second pass review of updated time in 1457-3.	0.7	
4/29/2025	KC	Confer with JSY re edits for 2024.	0.2	
4/29/2025	KC	(Billing Judgment) Draft email to KA re edits to various time entries in 1457-1.	0.0	0.4
4/29/2025	KC	Second pass review of updated 2025 time.	1.4	

SERVICES

Date	Person	Description of Services	Hours	Discount
4/29/2025	KC	(Billing Judgment) Draft email to KA re second pass edits to Jan-Mar, 2025 and JSY edits to April, 2025.	0.0	0.7
4/30/2025	KES	Create RBGG cost summary chart with breakdown of categories for fees motion.	2.7	
5/2/2025	JSY	Review and edit time records; conf. w/ KC re same.	0.3	
5/2/2025	BBK	Researching and preparing GCG Decl ISO Fees Petition.	2.0	
5/2/2025	KC	(Billing Judgment) Review and transmit JSY edits to fees records to KA.	0.0	0.4
5/6/2025	GCG	Conf with KES re fee declaration.	0.1	
5/6/2025	GCG	Emails KC-4L re same.	0.1	
5/6/2025	KC	(Billing Judgment) Draft email to KA requesting prebill of all time entries for matters 1457-1, 3, 4, 5, and 6.	0.0	0.1
5/6/2025	KC	Begin 3rd pass review time entries from 2017 to present.	0.8	
5/8/2025	KC	Third pass review of time entries.	0.9	
5/8/2025	KC	Continue third pass review of time entries.	2.3	
5/9/2025	JSY	Emails re costs issues.	0.1	
5/10/2025	JSY	Emails re costs issue.	0.1	
5/12/2025	BBK	Meeting w/ GCG re declaration ISO fees petition.	0.2	
5/13/2025	GCG	Research re Judge Gilliam approach to fee petitions.	0.2	
5/13/2025	JSY	Emails re fees motion.	0.2	
5/14/2025	JSY	Conf. and emails re fees orders from Judge Gilliam.	0.2	
5/14/2025	BBK	Reviewing JB analysis of Judge Gilliam class action fee award opinions.	0.1	
5/23/2025	JSY	Emails and conf. re costs payment.	0.2	
5/27/2025	BBK	Drafting/revising GCG decl ISO fees petition.	2.4	
5/29/2025	GCG	Conf with JSY and email GW-team re Rule 23(h) motion plan.	0.2	
6/2/2025	GCG	Emails BBK-KES-KC and conf JSY re Grunfeld fee declaration and cost receipts.	0.2	
6/2/2025	JSY	Conf. w/ BBK re GCG Decl.	0.1	
6/2/2025	BBK	Drafting GCG Decl ISO Fees Petition.	1.9	
6/2/2025	BBK	Emailing w/ GCG, KES and KC re GCG Decl ISO Support of Fees Petition and fees and costs records.	0.2	

SERVICES

Date	Person	Description of Services	Hours	Discount
6/2/2025	KES	Email team re status of costs and backup for fees motion and review chart re same.	0.2	
6/2/2025	KC	Research and save updated prebills for BBK review.	1.3	
6/2/2025	KC	Review second pass edits for 8-9-21 through 12-31-21 and draft email to KA re same.	2.1	
6/3/2025	BBK	Drafting GCG Decl ISO fees petition.	3.1	
6/4/2025	JSY	Review GCG decl; emails re same.	0.4	
6/4/2025	BBK	Drafting/revising GCG Decl ISO Fees Petition.	1.8	
6/4/2025	BBK	Emailing w/ JSY re GCG Decl ISO Fees Petition.	0.1	
6/6/2025	GCG	Begin reviewing Grunfeld declaration.	0.1	
7/3/2025	JSY	Emails re fees motion and declaration.	0.1	
7/3/2025	BBK	Emailing w/ JSY and GCG re fees petition and GCG Decl ISO same.	0.1	
7/4/2025	GCG	Emails GW-JSY-team re declaration needed for fees application.	0.1	
7/7/2025	GCG	Conf with JSY re vetting and reviewing time entries and revising Grunfeld declaration.	0.1	
7/7/2025	JSY	Emails re fee records.	0.2	
7/7/2025	BBK	Emails w/ RBGG team re status of vetting time records for fees motion.	0.1	
7/7/2025	KC	Research date of last revisions in 1457-1, -6 and email re same.	0.3	
7/8/2025	GCG	Review and revise Grunfeld fees declaration.	1.8	
7/8/2025	GCG	Conf with KES and emails KES-BBK-JSY re same and gathering exhibits.	0.5	
7/8/2025	JSY	Review and edit time entries; emails re same.	1.2	
7/8/2025	JSY	Review and edit GCG decl; emails re same.	1.2	
7/8/2025	JSY	Review revised GCG declaration; emails re same and re fees records.	0.3	
7/8/2025	BBK	Emailing w/ JSY re comments/proposed revisions to GCG Decl ISO Fees Motion.	0.1	
7/8/2025	BBK	Reviewing emails w/ RBGG team re vetting time for fees petition.	0.1	
7/8/2025	BBK	Reviewing JSY comments on GCG Decl ISO Fees Petition and revising accordingly.	1.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/8/2025	BBK	Emailing w/ GCG/JSY/KES re exhibits and additions to GCG Decl ISO Fees Petition.	0.2	
7/8/2025	BBK	Reviewing GCG comments on first portion of GCG Decl ISO Fees Petition and revising accordingly.	0.8	
7/8/2025	KC	Second pass review of 4-30-25 to 7-8-25 fees in 1457-1, -6.	0.5	
7/9/2025	GCG	Review and revise Grunfeld fees declaration.	1.2	
7/9/2025	GCG	Emails JSY-BBK-KES re revisions to same.	0.3	
7/9/2025	GCG	Conf with GW re same.	0.1	
7/9/2025	JSY	Emails re GCG decl and fees motion; review GCG decl.	0.3	
7/9/2025	BBK	Emails w/ GCG and JSY re revisions and additions to fees declaration.	0.2	
7/9/2025	BBK	Reviewing GCG comments and redlines to GCG fees declaration; responding to questions re same.	0.9	
7/9/2025	BBK	Emailing w/ GCG re plan for fees motion and other supporting declarations.	0.1	
7/9/2025	KES	Email team re costs chart for fees motion.	0.1	
7/10/2025	GCG	Meet with JSY and BBK to discuss revisions to Grunfeld declaration and fee motion and prepare for same.	1.2	
7/10/2025	GCG	Email GW-team re legal research for fee petition.	0.2	
7/10/2025	JSY	Meeting with GCG and BBK re fees declaration and motion.	0.5	
7/10/2025	BBK	Preparing for meeting w/ GCG and JSY re strategy for fees motion sand revisions to GCG Decl ISO same.	0.5	
7/10/2025	BBK	Meeting w/ GCG and JSY re GCG Decl ISO fees motion.	0.8	
7/10/2025	BBK	Analyzing additional materials sent by GCG for fees declaration.	0.3	
7/10/2025	BBK	Legal research re whether fees should be awarded for allegedly duplicative/excessive work.	0.5	
7/10/2025	KES	Brief review of cost chart.	0.1	
7/11/2025	GCG	Emails BBK - JSY - KEJ re Grunfeld declaration revisions and research for brief.	0.2	
7/11/2025	GCG	Conf with RP re declaration.	0.2	
7/11/2025	GCG	Email CG re declaration.	0.1	
7/11/2025	JSY	Emails re fees motion declarations.	0.2	
7/11/2025	BBK	Reviewing GCG - C. Center emails re declaration ISO fees motion.	0.1	

SERVICES

Date	Person	Description of Services	Hours	Discount
7/11/2025	BBK	Emails w/ GCG re status of revised draft GCG Decl ISO Fees Motion and plan for same.	0.2	
7/11/2025	BBK	Revising draft GCG Decl ISO Fees Motion.	3.2	
7/14/2025	JSY	Conf. w/ GCG re fees declaration.	0.1	
7/14/2025	BBK	Drafting revisions and additions to GCG Decl ISO Fees Motion.	5.1	
7/15/2025	GCG	Review and revise Grunfeld declaration ISO fees motion.	0.5	
7/15/2025	GCG	Conf with JSY and emails GW-team re same.	0.2	
7/15/2025	GCG	Revise cost chart.	0.2	
7/15/2025	GCG	Email KES-team re same.	0.1	
7/15/2025	JSY	Review GCG Decl; emails re same.	0.3	
7/15/2025	JSY	Conf w/ GCG re fees Decl.	0.1	
7/15/2025	BBK	Emailing w/ JSY and GCG re revised draft GCG Decl ISO Fees Motion.	0.1	
7/15/2025	BBK	Reviewing GCG - GW emails re fees motion and supporting docs.	0.1	
		Total Professional Services	261.9	13.9

Total Professional Services Due **$210,565.50**

PERSON RECAP

Person		Hours	Rate	Amount	Discount	Discount
MWB	Michael W. Bien	1.3	$1,675.00	$2,177.50	0.8	$1,340.00
LAE	Lisa A. Ells	0.0	$1,025.00	$0.00	0.1	$102.50
GCG	Gay C. Grunfeld	39.4	$1,325.00	$52,205.00	0.6	$795.00
SJR	Sanford Jay Rosen	3.6	$1,625.00	$5,850.00	2.4	$3,900.00
VS	Van Swearingen	0.9	$975.00	$877.50	0.0	$0.00
JSY	Jenny S. Yelin	63.1	$925.00	$58,367.50	3.5	$3,237.50
BBK	Benjamin Bien-Kahn	60.8	$900.00	$54,720.00	0.0	$0.00
AHS	Adrienne Spiegel	6.0	$550.00	$3,300.00	0.0	$0.00
KC	Kedra Chan	64.4	$350.00	$22,540.00	5.5	$1,925.00
KES	Karen E. Stilber	22.4	$470.00	$10,528.00	1.0	$470.00

DISBURSEMENTS

Date	Description of Disbursements	Amount
6/4/2025	(No Charge) Westlaw research	$0.00
7/10/2025	(No Charge) In-house Copying and Printing (209 @ $0.00)	$0.00
	Total Disbursements	$0.00

Total Professional Services	$222,335.50	
Billing Judgment Reductions	*($11,770.00)*	
Total Professional Services Due	$210,565.50	
Total Disbursements Due	$0.00	
Total Current Charges		$210,565.50
Less 10% Additional Across The Board Reduction		*($21,056.55)*
AMOUNT DUE		**$189,508.95**

Due Upon Receipt. Please include the invoice number on all remittance. Thank you.

EXHIBIT Z

RBGG COSTS/EXPENSES - SUMMARY	
Copying/Printing	$18,352.20
Court Reporter/Court Transcripts	$842.74
Depositions	$82,555.22
Document Hosting / Management	$55,914.47
Expert / Consultant Fees	$872,847.54
Investigation Services	$13,524.25
Legal and Fact Research	$39,732.96
Mediation Fees	$4,700.00
Postage/Delivery	$2,128.22
Miscellaneous	$1,646.22
Service of Process / Subpoenas	$11,025.71
Travel Expenses	$13,425.19
Long Distance Telephone	$230.25
TOTALS:	**$1,116,924.97**

Pacific Access Consulting

A Gary Waters Architectural Corporation Company

Invoice

Invoice #: 2019-059
Date: November 22, 2019
Terms: Upon Receipt

Bill To:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
2220 W. Kettleman Ln., Lodi, CA			
Inspection Date 10/15/2019			
Pre-Planning/Travel/Access Site Inspection	12 hrs.	$255.00/hr.	$3,060.00
Reimbursable Expenses			$93.96
Mileage: 162 mi. x $0.58/mi. = $96.96			
S2150 W Kettleman Ln., Lodi, CA			
Inspection Date 10/16/2019			
Pre-Planning/Travel/Access Site Inspection	9 hrs.	$255.00/hr.	$2,295.00
Reimbursable Expenses			$93.96
Mileage: 162 mi. x $0.58/mi. = $96.96			
950 Diablo Blvd., Danville, CA			
Inspection Date 10/22/2019			
Pre-Planning/Travel/Access Site Inspection	13.5 hrs.	$255.00/hr.	$3,442.50
Reimbursable Expenses			$69.60
Mileage: 120 mi. x $0.58/mi. = $69.60			

1 Sommer Ridge Dr., Roseville, CA			
Inspection Date 11/14/2019			
Pre-Planning/Travel/Access			
Site Inspection	9.5 hrs.	$255.00/hr.	$2,422.50
Travel Expenses 9/17/2019 thru 9/18/2019			
Reimbursable Expenses			$93.96
Mileage: 162 mi. x $0.58/mi. = $96.96			

SUBTOTAL	**$11,571.50**
50% INVOICED TO ROSEN BIEN GALVAN & GRUNFELD LLP	**$5,785.75**
TOTAL DUE THIS INVOICE	**$5,785.75**

All principal amounts over 30 days are subject to a 2% per month Finance Charge.

For you convenience we now accept credit card payments. There is a charge of 3-1/4% for processing. Please call our office to make a credit card payment.

Please Make Checks Payable to - "Gary Waters Architectural Corporation"

Pacific Access Consulting

A Gary Waters Architectural Corporation Company

Invoice

Invoice #: 2019-062
Date: December 12, 2019
Terms: Upon Receipt

Bill To:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Arbol Residences of Santa Rosa **300 Fountaingrove Parkway,** **Santa Rosa, CA 95403** Inspection Date 12/10/2019 Pre-Planning/Travel/Access Site Inspection	10 hrs.	$255.00/hr.	$2,550.00
Brookdale Mirage Inn **72750 Country Club Dr.** **Rancho Mirage, CA 92270** Inspection Date 12/11/2019 Pre-Planning/Travel/Access Site Inspection	24 hrs.	$255.00/hr.	$6,120.00
Reimbursable Expenses Mileage: 120 mi. x $0.58/mi. = $69.60 Airport Parking = $36.00 Per Diem 2 days x $65.00 = $130.00 Rental Car = $246.42 Gas = $22.04 Hotel = $549.16			$1,053.22

SUBTOTAL	**$9,723.22**
50% INVOICED TO ROSEN BIEN GALVAN & GRUNFELD LLP	**$4,861.61**
TOTAL DUE THIS INVOICE	**$4,861.61**

All principal amounts over 30 days are subject to a 2% per month Finance Charge.

For you convenience we now accept credit card payments. There is a charge of 3-1/4% for processing. Please call our office to make a credit card payment.

Please Make Checks Payable to - "Gary Waters Architectural Corporation"

Pacific Access Consulting

A Gary Waters Architectural Corporation Company

Invoice

Invoice #: 2020-016
Date: February 3, 2020
Terms: Upon Receipt

Bill To:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Brookdale Carmel Valley **13101 Hartfield Ave.** **San Diego, CA 92130** Inspection Date 1/21/2020 Pre-Planning/Travel/Access Site Inspection	15 hrs.	$255.00/hr.	$3,825.00
Brookdale Mirage Inn **72750 Country Club Dr.** **Rancho Mirage, CA 92270** Inspection Date 1/22/2020 Pre-Planning/Travel/Access Site Inspection	16 hrs.	$255.00/hr.	$4,080.00
Reimbursable Expenses Airfare = $668.00 Airport Parking = $44.00 Per Diem 3 days x $65.00 = $195.00 Rental Car = $194.02 Gas = $28.95 Hotel = $549.16			$1,679.13

Brookdale Rancho Mirage **72201 Country Club Dr.** **Rancho Mirage, CA 92270** Inspection Date 1/28/2020 Pre-Planning/Travel/Access Site Inspection	16 hrs.	$255.00/hr.	$4,080.00
Brookdale Mirage Inn **72750 Country Club Dr.** **Rancho Mirage, CA 92270** Inspection Date 1/29/2020 Pre-Planning/Travel/Access Site Inspection	16 hrs.	$255.00/hr.	$4,080.00
Reimbursable Expenses Airfare = $251.96 Airport Parking = $72.00 Per Diem 3 days x $65.00 = $195.00 Rental Car = $347.69 Gas = $37.64 Hotel = $522.00			$1,426.29

SUBTOTAL	**$19,170.42**
50% INVOICED TO RBGG LLP	**$9,585.21**
TOTAL DUE THIS INVOICE	**$9,585.21**

All principal amounts over 30 days are subject to a 2% per month Finance Charge.

For you convenience we now accept credit card payments. There is a charge of 3-1/4% for processing. Please call our office to make a credit card payment.

Please Make Checks Payable to - "Gary Waters Architectural Corporation"

Pacific Access Consulting

A Gary Waters Architectural Corporation Company

Invoice

Invoice #: 2020-039
Date: March 27, 2020
Terms: Upon Receipt

Bill To:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Brookdale San Juan Capistrano **31741 Rancho Viejo Rd.** **San Juan Capistrano, CA 92675** Inspection Date 3/4/2020 Pre-Planning/Travel/Access Site Inspection	16 hrs.	$255.00/hr.	$4,080.00
Report Preparation 3/16/20 thru 3/19/20 Barrier List	22 hrs.	$255.00/hr.	$5,610.00
Reimbursable Expenses Airfare = $361.96 Airport Parking = $36.00 Per Diem 2 days x $65.00 = $130.00 Rental Car = $215.24 Gas = $20.00 Hotel = $402.20 Mileage 138 mi. x $058/mi. = $80.04			$1,245.44

Brookdale Citrus Heights
7375 Stock Ranch Rd.
Citrus Heights, CA 95621

Inspection Date 3/10/2020			
Pre-Planning/Travel/Access Site Inspection	13.5 hrs.	$255.00/hr.	$3,442.50
Reimbursable Expenses			$131.08
Mileage			
226 mi. x $0.58/mi. = $131.08			

SUBTOTAL	**$14,509.02**
50% INVOICED TO RBGG LLP	**$7,254.51**
TOTAL DUE THIS INVOICE	**$7,254.51**

All principal amounts over 30 days are subject to a 2% per month Finance Charge.

For you convenience we now accept credit card payments. There is a charge of 3-1/4% for processing. Please call our office to make a credit card payment.

Please Make Checks Payable to - "Gary Waters Architectural Corporation"

PACIFIC access CONSULTING

Invoice

Invoice #: 2020.145
Date: August 28, 2020
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Reimbursable Expenses • Annual subscription BlueDAG Database Reporting System			$2,500.00
		Sub Total Due	$2,500.00
		50% Invoiced to Rosen Bien Galvan & Grunfeld LLP	$1,250.00
		TOTAL DUE	**$1,250.00**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2021.006
Date: January 8, 2021
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Scotts Valley Access Report Preparation	18hrs.	$255.00/hr.	$4,590.00
Santa Rosa – Fountaingrove Access Report Preparation	21hrs.	$255.00/hr.	$5,355.00
Tracy Access Report Preparation	18hrs.	$255.00/hr.	$4,590.00
San Ramon Access Report Preparation	24hrs.	$255.00/hr.	$6,120.00
Front End Report Draft Template Revisions	1hr.	$255.00/hr.	$255.00
		Sub Total Due	$20,910.00
		50% Invoiced to Schneider Wallace	$10,455.00
		TOTAL DUE	**$10,455.00**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2021.052
Date: June 4, 2021
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Orangevale Access Report Preparation	21-1/2hrs.	$280.00/hr.	$6,020.00
Santa Rosa – Chanate Access Report Preparation	22hrs.	$280.00/hr.	$6,160.00
Citrus Heights Access Report Preparation	22-1/2hrs.	$280.00/hr.	$6,300.00
Windsor Access Report Preparation	20hrs.	$280.00/hr.	$5,600.00
Roseville Access Report Preparation	21hrs.	$280.00/hr.	$5,880.00
General Office, Consulting, And Coordination	6hr.	$280.00/hr.	$1,680.00
		Sub Total Due	$31,640.00
		50% Invoiced to RBG & G, LLP	$15,820.00
		TOTAL DUE	**$15,820.00**

Please make checks payable to Gary Waters Architectural Corporation
Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2021.070
Date: August 18, 2021
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Northridge - Devonshire Access Report Preparation	20hrs.	$280.00/hr.	$5,600.00
San Diego – Clairmont Mesa Access Report Preparation	24hrs.	$280.00/hr.	$6,720.00
San Jose – Blossom River Way Access Report Preparation	19hrs.	$280.00/hr.	$5,320.00
S. Tarzana – Burbank Blvd. Access Report Preparation	16hrs.	$280.00/hr.	$4,480.00
Report Prep, Declaration Prep, Consultation, Q C and Coordination for Class Cert Motion	67hr.	$280.00/hr.	$18,760.00
		Sub Total Due	$40,880.00
		50% Invoiced to Rosen Bien Galvan & Grunfeld LLP	$20,440.00
		TOTAL DUE	**$20,440.00**

Please make checks payable to Gary Waters Architectural Corporation
Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2021.068
Date: July 31, 2021
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Auburn – Education St. Access Report Preparation	16hrs.	$280.00/hr.	$4,480.00
Brentwood – Cortona Way Access Report Preparation	24-1/2hrs.	$280.00/hr.	$6,860.00
Carlsbad – El Camino Real Access Report Preparation	24hrs.	$280.00/hr.	$6,720.00
Carmel Valley – Hartfield Ave., Del Mar Access Report Preparation	22hrs.	$280.00/hr.	$6,160.00
Danville – Diablo Rd. Access Report Preparation	24hrs.	$280.00/hr.	$6,720.00
Lodi – 2150 Kettleman Ln. Access Report Preparation	18-1/2hrs.	$280.00/hr.	$5,180.00
N. Fremont – 38935 Martha Ave. Access Report Preparation	20hr.	$280.00/hr.	$5,600.00

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

PACIFIC access CONSULTING

Rancho Mirage – 72201 Country Club Dr. Access Report Preparation	21hr.	$280.00/hr.	$5,880.00
Rancho Mirage – 72750 Country Club Dr. Access Report Preparation	36hr.	$280.00/hr.	$10,080.00
Access Consulting Services Emails, Phone Calls, and General Office	10hrs.	$280.00/hr.	$2,800.00

Sub Total Due	$60,480.00
50% Invoiced to Rosen Bien Galvan & Grunfeld LLP	$30,240.00
TOTAL DUE	**$30,240.00**

Please make checks payable to Gary Waters Architectural Corporation
Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2022.003
Date: January 6, 2021
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Access Litigation Support Services Including, but not limited to construction history and project timeline review, phone consultation, deposition preparation, and travel time	57hrs.	$280.00/hr.	$15,960.00
Deposition – 1st half	3.5hrs.	$400.00/hr.	$1,400.00
Deposition – 2nd half	3.5hrs.	$400.00/hr.	$1,400.00
Reimbursable Expenses 350 mi. x $0.58/mi. = $203.00 3 bridge tolls x $7.00/toll = $21.00 Parking Expense = $32.00			$256.00

Sub Total Due	$19,016.00
50% Invoiced to Rosen Bien Galvan & Grunfeld LLP	$9,508.00
TOTAL DUE	**$9,508.00**

Please make checks payable to Gary Waters Architectural Corporation
Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2022.037
Date: May 20, 2022
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Access Litigation Support Services From January 7, 2022 thru May 19, 2022 Including, but not limited to review of defendant depositions, defendant expert report and deposition, various case documents, review and confirmation of construction histories, report updates for original construction code, etc.	124hrs.	$294.00/hr.	$36,456.00

Sub Total Due	$36,456.00
50% Invoiced to RBG & G	$18,228.00
TOTAL DUE	**$18,228.00**

Please make checks payable to Gary Waters Architectural Corporation
Thank you, I appreciate your business!

Please note our address has changed, our new mailing address is:

Pacific Access Consulting
PO Box 942
Kenwood, CA 95452

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2024.014
Date: March 6, 2024
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
General Office Prep	4hrs.	$325.00/hr.	$1,300.00
Tracy – W Grant Line Rd. Access Survey, Travel & Prep	16hrs.	$325.00/hr.	$5,200.00
Santa Rosa – Arbol Fountaingrove Access Survey & Prep	10.5hrs.	$325.00/hr.	$3,412.50
Reimbursable Expenses			$1,468.43

Tracy
220 Miles x $0.75/mi. = $165.00
1 Bridge Toll x $7.00/Toll = $7.00
Hotel 1Night = $197.62
Per Diem 1-Day x $80.00/Day = $80.00
Per Diem Partial Day x $50.00 = $50.00

Hemet – Canceled Trip
Air Travel Round Trip $616.00
Hotel 2 Nights = $314.28
Travel Insurance = $38.53

Sub Total Due	$11,380.93
50% Invoiced to RBGG LLP	$5,690.47
TOTAL DUE	**$5,690.47**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2024.029
Date: May 1, 2024
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
Preparation of Barrier Reports for Fountaingrove and Tracy, Preparation of Common Barrier List, Preparation of Rule 26 Report and associated Activities	94hrs.	$325.00/hr.	$30,550.00
		Sub Total Due	$30,550.00
		50% Invoiced to RBG&G, LLP	$15,275.00
		TOTAL DUE	**$15,275.00**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2024.036
Date: June 10, 2024
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
May 1 thru June 4 Preparation of Response Declaration In Support of Plaintiff's Motion of Certification of Facility-Level Subclasses	32hrs.	$325.00/hr.	$10,400.00

Sub Total Due	$10,400.00
50% Invoiced to RBG&G, LLP	$5,200.00
TOTAL DUE	**$5,200.00**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

PACIFIC access CONSULTING

Invoice

Invoice #: 2024.050
Date: September 2, 2024
Terms: Due Upon Receipt

Invoice to:

Gay Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

Project: Accessibility Consulting and Litigation Support Services
Brookdale Litigation

Description	Quantity	Rate	Amount
June 5 thru August 3, 2024 Preparation of Litigation Support Materials as Requested, Josh Allen Rebuttal, Doug Anderson Rebuttal, Deposition Preparation, Post Deposition Litigation Support	106hrs.	$325.00/hr.	$34,450.00
Deposition	7hrs.	$600.00/hr.	$4,200.00
Reimbursable Expenses			$882.00
Hotel 2nights + Parking = $469.00 Parking at Guy's Office 4-Days = $64.00 Per Diem 2-Days at $80/day = $160.00 Miles 2-round trips Kenwood to Emeryville = 252 mi. at $0.75/mi. = $189.00			
Sub Total Due			$39,532.00
50% Invoiced to RBG&G, LLP			$19,766.00
TOTAL DUE			**$19,766.00**

Please make checks payable to Gary Waters Architectural Corporation

Thank you, I appreciate your business!

1421 Guerneville Road, Ste 230
Santa Rosa, CA 95403
O: (707) 523-0849
M: (707) 479-3872
gary@pacificaccessconsulting.com

A practice focused on accessibility in the built environment

Alex Barchuk, M.D., Inc
1125 SIR FRANCIS DRAKE BLVD
KENTFIELD, CA 949041418 US
4154853508
krista@alexbarchuk.com

Invoice 3612

BILL TO
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Floor 6
San Francisco, CA 94105

DATE	PLEASE PAY	DUE DATE
06/11/2024	**$2,500.00**	07/11/2024

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Consultation	Includes research into medical articles, review of materials sent, and numerous Zoom meetings	10	950.00	9,500.00
	Retainer	Retainer received, thank you	1	-7,000.00	-7,000.00

TOTAL DUE $2,500.00

THANK YOU.

Alex Barchuk, M.D., Inc
1125 SIR FRANCIS DRAKE BLVD
KENTFIELD, CA 949041418 US
4154853508
krista@alexbarchuk.com

Invoice 3674

BILL TO
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Floor 6
San Francisco, CA 94105

DATE	PLEASE PAY	DUE DATE
09/05/2024	$6,650.00	10/05/2024

CASE
Brookdale

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Record Review	Additional review of records and depo preparation	6	950.00	5,700.00
	Consultation	Pre-Depo Zoom 9/3 and T/Cs 9/4	1	950.00	950.00

TOTAL DUE $6,650.00

THANK YOU.

Alex Barchuk, M.D., Inc
1125 SIR FRANCIS DRAKE BLVD
KENTFIELD, CA 949041418 US
4154853508
krista@alexbarchuk.com

Invoice 3676

BILL TO
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Floor 6
San Francisco, CA 94105

DATE	PLEASE PAY	DUE DATE
09/06/2024	**$7,500.00**	10/06/2024

CASE
Brookdale- Depo Testimony Invc

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
	Depo Testimony		6	1,250.00	7,500.00

TOTAL DUE $7,500.00

THANK YOU.

CHOPRA
LITIGATION
CONSULTING

11/12/2024

Jenny Yelin, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 MISSION STREET 6TH FLOOR
SAN FRANCISCO, CA 94105
JYELIN@RBGG.COM

RE: STINER V. BROOKDALE

BILLING STATEMENT

Retainer per contract letter of 11/12/24..... $18,470

CHOPRA LITIGATION CONSULTING

INVOICE

Chopra Litigation Consulting, LLC
1329 Eastshore Drive
Alameda, CA 94501
510.680.1964

Due Date:	3/5/25
Total Amount:	$38,362.05
Number:	
Case:	STINER V. BROOKDALE

Jenny Yelin, Esq.
Rosen Bien Galvan & Grunfeld
101 Mission Street, Sixth Floor
San Francisco, CA 94105
JYelin@rbgg.com

INVOICE SUMMARY

Description	Amount
Professional Fees	$22,910.00
Reimbursable Expenses	$15,452.05
TOTAL AMOUNT DUE	**$38,362.05**

CHOPRA LITIGATION CONSULTING

Chopra Litigation Consulting, LLC
1329 Eastshore Drive
Alameda, CA 94501
510.680.1964

INVOICE

Due Date: 3/5/25
Total Amount: $38,362.05
Number:
Case: STINER V. BROOKDALE

Jenny Yelin, Esq.
Rosen Bien Galvan & Grunfeld
101 Mission Street, Sixth Floor
San Francisco, CA 94105
JYelin@rbgg.com

SUMMARY OF CHARGES

Source	Date	Code	Hrs / Qnt	Rate	Amount
Professional Fees					
Sonia Chopra	1/15/25	Jury Questionnaire: Edit/Review	0.50	$500.00	$250.00
Emma Danigole	12/15/24	Travel	5.90	$150.00	$885.00
Emma Danigole	12/14/24	Focus Group: Conduct	9.70	$300.00	$2,910.00
Emma Danigole	12/14/24	Focus Group: Materials Prep	0.20	$300.00	$60.00
Sonia Chopra	12/14/24	Focus Group: Conduct	9.50	$500.00	$4,750.00
Sonia Chopra	12/14/24	Travel: Travel Time	1.30	$250.00	$325.00
Emma Danigole	12/13/24	Focus Group: Materials Prep	9.30	$300.00	$2,790.00
Emma Danigole	12/13/24	Travel: Travel Time	4.00	$150.00	$600.00
Sonia Chopra	12/13/24	Focus Group: Materials Prep	6.60	$500.00	$3,300.00
Emma Danigole	12/12/24	Focus Group: Materials Prep	5.00	$300.00	$1,500.00
Emma Danigole	12/9/24	Focus Group: Design & Planning	0.50	$300.00	$150.00
Emma Danigole	12/9/24	Focus Group: Materials Prep	1.10	$300.00	$330.00
Sonia Chopra	12/9/24	Case Consultation: Meeting	0.30	$500.00	$150.00
Sonia Chopra	12/9/24	Focus Group: Materials Prep	1.30	$500.00	$650.00
Emma Danigole	12/8/24	Admin: Correspondence	0.30	$300.00	$90.00
Emma Danigole	12/6/24	Focus Group: Materials Prep	3.00	$300.00	$900.00
Emma Danigole	12/3/24	Focus Group: Materials Prep	0.70	$300.00	$210.00
Sonia Chopra	11/30/24	Focus Group: Screener & Specs	0.60	$500.00	$300.00
Emma Danigole	11/26/24	Focus Group: Screener & Specs	2.40	$300.00	$720.00
Sonia Chopra	11/26/24	Voir Dire Questions: Judge	1.80	$500.00	$900.00
Sonia Chopra	11/25/24	Case Consultation: Meeting	0.80	$500.00	$400.00
Sonia Chopra	11/25/24	Case Consultation: Review Case Materials	1.00	$500.00	$500.00

CHOPRA LITIGATION CONSULTING

INVOICE

Chopra Litigation Consulting, LLC
1329 Eastshore Drive
Alameda, CA 94501
510.680.1964

Due Date: 3/5/25
Total Amount: $38,362.05
Number:
Case: STINER V. BROOKDALE

Jenny Yelin, Esq.
Rosen Bien Galvan & Grunfeld
101 Mission Street, Sixth Floor
San Francisco, CA 94105
JYelin@rbgg.com

SUMMARY OF CHARGES

Source	Date	Code	Hrs / Qnt	Rate	Amount
Emma Danigole	11/25/24	Case Consultation: Meeting	0.80	$300.00	$240.00
		Professional Fees	**66.60**		**$22,910.00**
Reimbursable Expenses					
Emma Danigole	12/15/25	Travel: Ground Transportation	--	$0.00	$111.87
Sonia Chopra	1/16/25	Cancellation Fee	--	$0.00	$2,500.00
Sonia Chopra	12/14/24	Travel:Mileage	30.80	$0.665	$20.48
Sonia Chopra	12/14/24	Focus Group Incentives	--	$0.00	$9,000.00
Sonia Chopra	12/14/24	Focus Group Facility Costs	--	$0.00	$4,386.40
Sonia Chopra	12/14/24	Travel: Parking	--	$0.00	$30.00
Sonia Chopra	12/14/24	Travel:Tolls	--	$0.00	$7.00
Sonia Chopra	12/14/24	Focus Group Recruiting Costs	--	$0.00	$4,473.00
Sonia Chopra	12/14/24	Focus Group Food	--	$0.00	$2,112.24
Sonia Chopra	12/13/24	Copy Services	--	$0.00	$192.90
Emma Danigole	12/13/24	Travel:Airfare	--	$0.00	$545.96
Emma Danigole	12/13/24	Travel:Hotel	--	$0.00	$327.20
Sonia Chopra	12/3/24	Retainer Received	--	$0.00	-$9,235.00
Sonia Chopra	10/28/24	Focus Group: Logistics Coordination	--	$0.00	$980.00
		Reimbursable Expenses	**30.80**		**$15,452.05**
		AMOUNT DUE (THIS INVOICE)	**97.40**		**$38,362.05**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

December 20, 2021
Client-Matter: 15312-41410
Invoice #: 125735
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through December 15, 2021

Professional Services	$	25,521.25	USD
Expenses Incurred		1,276.07	
CURRENT CHARGES	**$**	**26,797.32**	**USD**

PAYMENT IS DUE BY January 19, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	125735

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 125735
Client-Matter: 15312-041410

Services Rendered Through December 15, 2021

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	8.00	7,160.00
Associate Director			
Quynh Tran	590.00	9.50	5,605.00
Consultant			
James Merrick	325.00	39.25	12,756.25
Total Professional Services		**56.75**	**25,521.25**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	1,276.07
Total Expenses	**1,276.07**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 125735
Client-Matter: 15312-041410

Services Rendered Through December 15, 2021

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
12/01/21	James Merrick	Reviewed case documents.	6.00
12/02/21	James Merrick	Reviewed case documents.	3.75
12/02/21	Saul Solomon	Reviewed files.	1.00
12/02/21	Quynh Tran	Organized files; project management; reviewed documents.	1.50
12/03/21	James Merrick	Reviewed case documents.	4.00
12/03/21	Quynh Tran	Engaged in strategy/planning/job administration.	0.25
12/06/21	James Merrick	Reviewed case documents.	6.25
12/06/21	Quynh Tran	Project team discussions; reviewed documents.	3.25
12/07/21	James Merrick	Reviewed case documents.	2.50
12/07/21	Quynh Tran	Reviewed documents and information request list.	3.25
12/08/21	James Merrick	Reviewed case documents.	5.75
12/09/21	James Merrick	Reviewed case documents.	4.50
12/09/21	Saul Solomon	Document list, reviewed files.	2.50
12/09/21	Quynh Tran	Project team discussion; reviewed and updated information request.	1.25
12/10/21	Saul Solomon	Document list, reviewed files.	2.00
12/14/21	James Merrick	Reviewed case documents.	4.50
12/14/21	Saul Solomon	Document list, reviewed files.	2.50
12/15/21	James Merrick	Reviewed case documents.	2.00
Professional Services			**56.75**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

January 5, 2022
Client-Matter: 15312-41410
Invoice #: 126289
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through December 31, 2021

Professional Services	$	6,371.25	USD
Expenses Incurred		318.57	
CURRENT CHARGES	**$**	**6,689.82**	**USD**

PAYMENT IS DUE BY February 4, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

OTHER OUTSTANDING INVOICES AS OF TODAY			
Invoice # 125735 - Dated 12/20/21	26,797.32	Due Date: 01/19/22	**DUE IN 14 DAYS**

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	126289

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 126289
Client-Matter: 15312-041410

Services Rendered Through December 31, 2021

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	5.00	4,475.00
Associate Director			
Quynh Tran	590.00	2.25	1,327.50
Consultant			
James Merrick	325.00	1.75	568.75
Total Professional Services		**9.00**	**6,371.25**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	318.57
Total Expenses	**318.57**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 126289
Client-Matter: 15312-041410

Services Rendered Through December 31, 2021

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
12/16/21	James Merrick	Reviewed case documents.	1.75
12/16/21	Saul Solomon	Document list, analysis.	1.50
12/16/21	Quynh Tran	Call with counsel; project management.	1.25
12/17/21	Saul Solomon	Document list, analysis.	2.00
12/17/21	Quynh Tran	Prepared for and participated in call with counsel; project management.	1.00
12/29/21	Saul Solomon	Analysis.	1.50
Professional Services			**9.00**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

January 27, 2022
Client-Matter: 15312-41410
Invoice #: 127656
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through January 15, 2022

Professional Services	$	12,488.75	USD
Expenses Incurred		624.44	
CURRENT CHARGES	**$**	**13,113.19**	**USD**

PAYMENT IS DUE BY February 26, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

OTHER OUTSTANDING INVOICES AS OF TODAY			
Invoice # 125735 - Dated 12/20/21	10,000.00	Due Date: 01/19/22	**PAST DUE**

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	127656

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 127656
Client-Matter: 15312-041410

Services Rendered Through January 15, 2022

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	3.00	2,685.00
Associate Director			
Quynh Tran	645.00	5.50	3,547.50
Consultant			
James Merrick	325.00	19.25	6,256.25
Total Professional Services		**27.75**	**12,488.75**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	624.44
Total Expenses	**624.44**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 127656
Client-Matter: 15312-041410

Services Rendered Through January 15, 2022

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
01/06/22	Quynh Tran	Downloaded and organized documents; reviewed documents.	0.75
01/07/22	James Merrick	Reviewed case documents.	1.50
01/07/22	Quynh Tran	Reviewed case documents.	1.50
01/10/22	Quynh Tran	Engaged in strategy/planning/job administration.	0.50
01/11/22	James Merrick	Reviewed case documents.	2.25
01/12/22	James Merrick	Reviewed case documents.	2.00
01/12/22	Quynh Tran	Engaged in strategy/planning/job administration.	0.25
01/13/22	James Merrick	Reviewed case documents.	8.00
01/13/22	Saul Solomon	Document review, call.	1.50
01/13/22	Quynh Tran	Reviewed documents; call with Counsel; project management.	2.50
01/14/22	James Merrick	Reviewed case documents.	5.50
01/14/22	Saul Solomon	Document review.	1.50
Professional Services			**27.75**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

February 3, 2022
Client-Matter: 15312-41410
Invoice #: 127803
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through January 31, 2022

Professional Services	$	8,475.00	USD
Expenses Incurred		423.75	
CURRENT CHARGES	**$**	**8,898.75**	**USD**

PAYMENT IS DUE BY March 5, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

OTHER OUTSTANDING INVOICES AS OF TODAY			
Invoice # 125735 - Dated 12/20/21	10,000.00	Due Date: 01/19/22	**PAST DUE**
Invoice # 127656 - Dated 01/27/22	13,113.19	Due Date: 02/26/22	**DUE IN 23 DAYS**

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	127803

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 127803
Client-Matter: 15312-041410

Services Rendered Through January 31, 2022

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	1.50	1,342.50
Associate Director			
Quynh Tran	645.00	3.50	2,257.50
Consultant			
James Merrick	325.00	15.00	4,875.00
Total Professional Services		**20.00**	**8,475.00**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	423.75
Total Expenses	**423.75**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 127803
Client-Matter: 15312-041410

Services Rendered Through January 31, 2022

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
01/18/22	James Merrick	Reviewed case documents.	3.50
01/18/22	Quynh Tran	Engaged in strategy/planning/job administration.	0.25
01/19/22	James Merrick	Reviewed case documents.	5.00
01/20/22	James Merrick	Reviewed case documents.	4.50
01/21/22	James Merrick	Reviewed case documents.	1.25
01/27/22	James Merrick	Meeting or call - internal.	0.75
01/27/22	Quynh Tran	Reviewed case materials; project team discussion.	2.50
01/31/22	Saul Solomon	Call with clients.	1.50
01/31/22	Quynh Tran	Meeting or call with Client and/or Counsel.	0.75
Professional Services			**20.00**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

March 17, 2022
Client-Matter: 15312-41410
Invoice #: 130366
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through March 15, 2022

Professional Services	$	17,126.25	USD
Expenses Incurred		856.32	
CURRENT CHARGES	**$**	**17,982.57**	**USD**

PAYMENT IS DUE BY April 16, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	130366

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 130366
Client-Matter: 15312-041410

Services Rendered Through March 15, 2022

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	7.00	6,265.00
Associate Director			
Quynh Tran	645.00	5.25	3,386.25
Consultant			
James Merrick	325.00	23.00	7,475.00
Total Professional Services		**35.25**	**17,126.25**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	856.32
Total Expenses	**856.32**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 130366
Client-Matter: 15312-041410

Services Rendered Through March 15, 2022

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
03/08/22	James Merrick	Reviewed case documents.	1.50
03/08/22	Saul Solomon	Call, documents.	1.50
03/08/22	Quynh Tran	Reviewed case materials.	2.50
03/09/22	James Merrick	Reviewed case documents.	3.00
03/09/22	Saul Solomon	Reviewed motion, class certification.	1.50
03/09/22	Quynh Tran	Reviewed case materials; project management.	2.75
03/10/22	James Merrick	Reviewed case documents.	4.75
03/14/22	James Merrick	Reviewed case documents, performed research.	5.75
03/14/22	Saul Solomon	Call, document review.	2.50
03/15/22	James Merrick	Performed research.	8.00
03/15/22	Saul Solomon	Analysis.	1.50
Professional Services			**35.25**

EBDA
East Bay Dispute & Advisory LLC

Invoice

Gay C. Grunfeld
Rosen Bien Galvan & Grunfeld LLP
101 Mission St., 6th Floor
San Francisco, CA 94105

Via Email: GGrunfeld@rbgg.com

April 5, 2022
Client-Matter: 15312-41410
Invoice #: 131043
Tax ID: 27-1451273

RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Services Rendered Through March 31, 2022

Professional Services	$	11,791.25	USD
Expenses Incurred		589.57	
CURRENT CHARGES	**$**	**12,380.82**	**USD**

PAYMENT IS DUE BY May 5, 2022

Please direct questions regarding this invoice to: Saul Solomon at (713) 481-9431 or ssolomon@thinkbrg.com.

Please remit payment by check to:
East Bay Dispute & Advisory LLC
2200 Powell Street, Suite 1200
Emeryville, CA 94608

Please remit payment by wire or ACH to:

Bank Name:	PNC Bank, N.A.
SWIFT:	PNCCUS33
ABA #:	031207607
Account Name:	East Bay Dispute & Advisory LLC
Account #:	8026411947
Reference:	131043

Remittance advices are to be sent to:
remitadvice@thinkbrg.com

****Due to COVID-19, we are kindly requesting all payments to be made electronically.**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 131043
Client-Matter: 15312-041410

Services Rendered Through March 31, 2022

PROFESSIONAL SERVICES

	Rate	Hours	Amount
Managing Director			
Saul Solomon	895.00	4.50	4,027.50
Associate Director			
Quynh Tran	645.00	7.25	4,676.25
Consultant			
James Merrick	325.00	9.50	3,087.50
Total Professional Services		**21.25**	**11,791.25**

EXPENSES

Internal Expenses: Data, IT Services, Telecom, Supplies, Copies	589.57
Total Expenses	**589.57**

EBDA
East Bay Dispute & Advisory LLC

Invoice

To: Gay C. Grunfeld
c/o: Rosen Bien Galvan & Grunfeld LLP
RE: Stiner, et al v. Brookdale Senior Living, Inc., et al.

Invoice # 131043
Client-Matter: 15312-041410

Services Rendered Through March 31, 2022

DETAIL OF PROFESSIONAL SERVICES

Date	Name	Description	Hours
03/16/22	James Merrick	Reviewed case documents; performed research.	6.75
03/16/22	Saul Solomon	Analysis.	1.75
03/16/22	Quynh Tran	Project management; performed research; reviewed and updated memo.	5.50
03/17/22	James Merrick	Reviewed case documents.	2.75
03/17/22	Saul Solomon	Analysis, memo.	2.75
03/17/22	Quynh Tran	Reviewed and updated memo; performed research; reviewed documents.	1.75
Professional Services			**21.25**

MARKS BALETTE GIESSEL & YOUNG, PLLC
BROOKDALE CLASS ACTION EXPERT COSTS AND FUNDING
2/7/2022

	INVOICE DATE	SOURCE NAME	MEMO	PAID BY MBGY OR UNPAID	MBGY REIMBURSED BY ATTORNEYS ?	INVOICE TOTAL	CUMULATIVE TOTAL	DATE INVOICE 1ST INCLUDED IN EXPERT COST SPREADSHEET
1	08/16/2021	PROMODEL	MODELING, MOST CLOUD, RUBIC CUBE TESTING	PAID	YES	18,703.12	18,703.12	9/1/2021
2	08/31/2021	PROMODEL	MOST CLOUD COMPUTING HOURS	PAID	YES	1,933.85	20,636.97	9/1/2021
3	08/31/2021	CRISTINA FLORES	CASE WORK AND TC WITH ATTORNEY/CONSULTANTS: APRIL-JUNE 9	PAID	YES	11,900.00	32,536.97	9/1/2021
4	09/08/2021	PROMODEL	AUGUST HOURS & MOST CLOUD COMPUTING HOURS	UNPAID	NO	21,693.29	54,230.26	
5	10/08/2021	PROMODEL	SEPTEMBER HOURS	UNPAID	NO	3,000.00	57,230.26	
6	11/16/2021	PROMODEL	OCTOBER HOURS & MOST CLOUD COMPUTING HOURS - SEPT & OCT 2021	UNPAID	NO	4,861.87	62,092.13	
7	12/13/2021	PROMODEL	NOVEMBER HOURS	UNPAID	NO	6,937.50	69,029.63	
8	12/31/2021	CRISTINA FLORES	CASE WORK AND TC WITH ATTORNEY/CONSULTANTS: JUNE 10 - DEC	UNPAID	NO	76,300.00	145,329.63	
9	01/31/2022	RICHARD FELDMAN	MEDMODEL WORK	PAID	NO	4,688.50	150,018.13	
10	01/13/2022	PROMODEL	PHASE 4 TSA DECEMBER HOURS, MOST COMPUTING HOURS	UNPAID	NO	12,108.82	162,126.95	
11	01/31/2022	CRISTINA FLORES	CASEWORK: January 11 & 12, 2022	UNPAID	NO	1,000.00	163,126.95	
						163,126.95		

SUMMARY OF PAID INVOICES, UNPAID INVOICES, AND REIMBURSEMENTS:

	$32,536.97	REIMBURSEMENTS FROM PARTNERING ATTORNEYS TO MBGY FOR EXPERT PAYMENTS
	37,225.47	TOTAL DISBURSED/PAID TO EXPERTS BY MBGY AS OF 02/07/2022
+	124,901.48	FUNDING NEEDED FROM PARTNERING ATTORNEYS FOR UNREIMBURSED INVOICES:
		$21,693.29 -PROMODEL 9/8/2021 - ROW 4
		$3,000.00 -PROMODEL 10/8/2021 - ROW 5
		$4,861.87 -PROMODEL 11/16/2021 - ROW 6
		$6,937.50 -PROMODEL 12/13/2021 - ROW 7
		$76,300.00 -CRISTINA FLORES 12/31/2021 - ROW 8
		$12,108.82 -PROMODEL 1/13/2022 - ROW 10
		$1,000.00 -CRISTINA FLORES 1/31/2022 - ROW 11
	4,688.50	REIMBURSEMENT FROM PARTNERING ATTORNEYS TO MBGY FOR INVOICES PAID
		$4,688.50 -RICHARD FELDMAN 1/31/2022 - ROW 9
=	130,589.98	FUNDING NEEDED FROM PARTNERING ATTORNEYS FOR PAID AND UNPAID INVOICES

MARKS BALETTE GIESSEL & YOUNG, PLLC
BROOKDALE CLASS ACTION EXPERT COSTS AND FUNDING
9/29/2022

	INVOICE DATE	SOURCE NAME	MEMO	PAID BY MBGY OR UNPAID	MBGY REIMBURSED BY ATTORNEYS ?	INVOICE TOTAL	CUMULATIVE TOTAL
1	08/16/2021	PROMODEL	MODELING, MOST CLOUD, RUBIC CUBE TESTING	PAID	YES	18,703.12	18,703.12
2	08/31/2021	PROMODEL	MOST CLOUD COMPUTING HOURS	PAID	YES	1,933.85	20,636.97
3	08/31/2021	CRISTINA FLORES	CASE WORK AND TC WITH ATTORNEY/CONSULTANTS: APRIL-JUNE 9	PAID	YES	11,900.00	32,536.97
4	09/08/2021	PROMODEL	AUGUST HOURS & MOST CLOUD COMPUTING HOURS	PAID	YES	21,693.29	54,230.26
5	10/08/2021	PROMODEL	SEPTEMBER HOURS	PAID	YES	3,000.00	57,230.26
6	11/16/2021	PROMODEL	OCTOBER HOURS & MOST CLOUD COMPUTING HOURS - SEPT & OCT 2021	PAID	YES	4,861.87	62,092.13
7	12/13/2021	PROMODEL	NOVEMBER HOURS	PAID	YES	6,937.50	69,029.63
8	12/31/2021	CRISTINA FLORES	CASE WORK AND TC WITH ATTORNEY/CONSULTANTS: JUNE 10 - DEC	PAID	YES	76,300.00	145,329.63
9	01/31/2022	RICHARD FELDMAN	MEDMODEL WORK	PAID	NO	8,463.50	153,793.13
10	01/13/2022	PROMODEL	PHASE 4 TSA DECEMBER HOURS, MOST COMPUTING HOURS	PAID	YES	12,108.82	165,901.95
11	01/31/2022	CRISTINA FLORES	CASEWORK: January 11 & 12, 2022	PAID	YES	1,000.00	166,901.95
12	02/09/2022	PROMODEL	PHASE 4 TSA JANUARY HOURS, MOST COMPUTING HOURS	PAID	NO	8,484.37	175,386.32
13	02/28/2022	RICHARD FELDMAN	BROOKDALE REGRESSION REPORT	PAID	NO	7,900.00	183,286.32
14	03/15/2022	PROMODEL	PHASE 4 TSA FEBRUARY HOURS, MOST COMPUTING HOURS	PAID	NO	7,089.09	190,375.41
15	03/16/2022	EDWARD JONES	REVIEW PROCESS & FILES, DRAFT PREPARATION OF OPINION	PAID	NO	17,000.00	207,375.41
16	03/30/2022	RICHARD FELDMAN	MODEL REVIEW	PAID	NO	4,800.00	212,175.41
17	03/31/2022	CRISTINA FLORES	MARCH 2022 HOURS	UNPAID	NO	3,300.00	215,475.41
18	04/11/2022	PROMODEL	PHASE 4 TSA MARCH HOURS, MOST COMPUTING HOURS	PAID	NO	26,326.90	241,802.31
19	04/30/2022	RICHARD FELDMAN	MODEL REVIEW	PAID	NO	6,400.00	248,202.31
20	04/30/2022	EDWARD JONES	DEPOSITION PREPARATION	PAID	NO	2,375.00	250,577.31
21	04/30/2022	CRISTINA FLORES	APRIL 2022 HOURS	UNPAID	NO	1,500.00	252,077.31
22	05/01/2022	DAVID BELSON	DISCUSSIONS, RUNNING & REVIEW OF MEDMODEL SIMULATION	PAID	NO	3,500.00	255,577.31
23	05/12/2022	PROMODEL	PHASE 4 TSA APRIL HOURS, MOST COMPUTING HOURS	PAID	NO	23,660.36	279,237.67
24	05/31/2022	EDWARD JONES	DEPOSITION PREPARATION	PAID	NO	20,500.00	299,737.67
25	05/31/2022	CRISTINA FLORES	MAY 2022 HOURS	PAID	N/A	7,700.00	307,437.67
26	06/03/2022	DAVID BELSON	MEDMODEL SIMULATION, PREP OF DECLARATION DOCUMENT	PAID	NO	9,250.00	316,687.67
27	06/16/2022	PROMODEL	PHASE 4 TSA MAY HOURS, MOST COMPUTING HOURS	PAID	NO	49,370.94	366,058.61
28	06/30/2022	EDWARD JONES	JUNE 2022 - UPDATED CODE, PREPARED SUMMARIES	UNPAID	NO	875.00	366,933.61
29	06/30/2022	RICHARD FELDMAN	MAY 2022 HOURS - MODEL REVIEW	PAID	NO	8,000.00	374,933.61
30	06/30/2022	RICHARD FELDMAN	JUNE 2022 HOURS - MODEL REVIEW	PAID	NO	7,200.00	382,133.61
31	07/31/2022	RICHARD FELDMAN	JULY 2022 HOURS - MODEL REVIEW	PAID	NO	15,900.00	398,033.61
32	07/31/2022	DAVID BELSON	JUNE & JULY HOURS - VALIDATION & REVIEW OF MODEL	UNPAID	NO	4,500.00	402,533.61
33	07/31/2022	PROMODEL	PHASE 4 TSA JUNE HOURS, MOST COMPUTING HOURS	UNPAID	NO	5,236.39	407,770.00
34	08/31/2022	PROMODEL	PHASE 4 TSA JULY HOURS, MOST COMPUTING HOURS	UNPAID	NO	3,796.86	411,566.86
35	08/31/2022	RICHARD FELDMAN	AUGUST 2022 HOURS - MODEL REVIEW	UNPAID	NO	11,800.00	423,366.86
36	09/15/2022	PROMODEL	PHASE 4 TSA AUGUST HOURS, MOST COMPUTING HOURS	UNPAID	NO	864.37	424,231.23
						424,231.23	

SUMMARY OF PAID INVOICES, UNPAID INVOICES, AND REIMBURSEMENTS:

	$158,438.45	REIMBURSEMENTS FROM PARTNERING ATTORNEYS TO MBGY FOR EXPERT PAYMENTS
	158,438.45	TOTAL DISBURSED/PAID TO EXPERTS BY MBGY AS OF 9/29/22
+	31,872.62	FUNDING NEEDED FROM PARTNERING ATTORNEYS FOR UNPAID INVOICES:
		$3,300.00 -CRISTINA FLORES 3/31/2022 - ROW 17
		$1,500.00 -CRISTINA FLORES 4/30/2022 - ROW 21
		$875.00 -EDWARD JONES 6/30/22 - ROW 28
		$4,500.00 -DAVID BELSON 7/31/22 - ROW 32
		$5,236.39 -PROMODEL 7/31/2022 - ROW 33
		$3,796.86 -PROMODEL 8/31/2022 - ROW 34
		$11,800.00 -RICHARD FELDMAN 8/31/2022 - ROW 35
		$864.37 -PROMODEL 9/15/2022 - ROW 36
	226,220.16	REIMBURSEMENT NEEDED FROM PARTNERING ATTORNEYS TO MBGY FOR INVOICES PAID
		$8,463.50 -RICHARD FELDMAN 1/31/2022 - ROW 9
		$8,484.37 -PROMODEL 2/9/2022 - ROW 12
		$7,900.00 -RICHARD FELDMAN 2/28/2022 - ROW 13
		$7,089.09 -PROMODEL 3/15/22 - ROW 14
		$17,000.00 -EDWARD JONES 3/16/2022 - ROW 15
		$4,800.00 -RICHARD FELDMAN 3/30/2022 - ROW 16
		$26,326.90 -PROMODEL 4/11/2022 - ROW 18
		$6,400.00 -RICHARD FELDMAN 4/30/2022 - ROW 19
		$2,375.00 -EDWARD JONES 4/30/2022 - ROW 20
		$3,500.00 - DAVID BELSON 5/1/2022 - ROW 22
		$23,660.36 -PROMODEL 5/12/2022 - ROW 23
		$20,500.00 -EDWARD JONES 5/31/2022 - ROW 24
		$9,250.00 -DAVID BELSON 6/3/2022 - ROW 26
		$49,370.94 -PROMODEL 6/16/2022 - ROW 27
		$8,000.00 -RICHARD FELDMAN 6/30/22 - ROW 29
		$7,200.00 -RICHARD FELDMAN 6/30/22 - ROW 30
		$15,900.00 -RICHARD FELDMAN 7/31/22 - ROW 31
=	258,092.78	FUNDING NEEDED FROM PARTNERING ATTORNEYS FOR PAID AND UNPAID INVOICES

	7,700.00	PAID BY SCHNEIDER WALLACE DIRECTLY
		$7,700.00 -CRISTINA FLORES 5/31/2022 - ROW 25

VISUAL EVIDENCE

supporting your success

CVisualEvidence LLC
2441 W 205th St., Ste C102
Torrance CA, 90501
310-831-8900

Invoice #: 15669
Invoice Date: 2/4/2025
Terms: Net 30

Name:
Rosen Bien Galvan & Grunfeld LLP
Gay Grunfeld, Esq.
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Case: Stiner v Brookdale Senior Living

Date	Tech	Description	/Unit	Rate	Total
1/9/2025	SH	Ultra-High-Definition Video Production One Camera and One Camera Operator - Half Day: Filmed Parking Lot Demonstrative Evidence Video Editing (High-Definition): Created viewing copy of filming, uploaded and sent to client link to download.	1	800.00	800.00
1/9/2025	SH		0.5	200.00	100.00

Electronic Payments:
Bank of America
Account # 000629174811
ACH Routing # 122000661
Bank Wire Routing # 026009593

Click here to pay with

Total	$900.00
Payments/Credits	$0.00
Balance Due	$900.00

Please make check payable to "CVisualEvidence LLC"

1.5% interest charged per month for unpaid balances

VISUAL EVIDENCE

supporting your success

CVisualEvidence LLC
2441 W 205th St., Ste C102
Torrance CA, 90501
310-831-8900

Invoice #: 15610
Invoice Date: 11/27/2024
Terms: Net 30

Name:
Rosen Bien Galvan & Grunfeld LLP
Gay Grunfeld, Esq.
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Case: Stiner v Brookdale Senior Living

Date	Tech	Description	/Unit	Rate	Total
11/4/2024	KM	Ultra-High-Definition Video Production One Camera and One Camera Operator - Half Day:	1	800.00	800.00
11/8/2024	SH	Demonstrative Evidence Video Editing (High-Definition): Imported footage into premiere and organized it.	0.7	200.00	140.00
11/8/2024	SH	Demonstrative Evidence Video Editing (High-Definition): Live editing session	1.8	200.00	360.00
11/14/2024	SH	Demonstrative Evidence Video Editing (High-Definition): Got two screenshots of Stacy in her electric wheelchair.	0.2	200.00	40.00

Electronic Payments:
Bank of America
Account # 000629174811
ACH Routing # 122000661
Bank Wire Routing # 026009593

Click here to pay with

VISA MasterCard AMERICAN EXPRESS

Total	$1,340.00
Payments/Credits	$0.00
Balance Due	$1,340.00

Please make check payable to "CVisualEvidence LLC"

1.5% interest charged per month for unpaid balances

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110449881	3/31/2021	Due upon receipt

Job No.	Job Date:	Balance
1021253	3/18/2021	$1337.50

Case Name

Stacia Stiner, et al. v. Brookdale Senior Living, Inc., et al.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Gay Grunfeld Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: VIDEOTAPE SERVICESKimia Ataein -- (VIDEO)					
*Videotape Services	8.00	$150.00	$1200.00	$0.00	$1200.00
Video Additional Hours (Overtime)	0.50	$225.00	$112.50	$0.00	$112.50
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
(Taxable 0.00)					
			$1337.50	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$1337.50**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$1337.50**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110449881
Invoice Date:	3/31/2021
Total Due	**$1337.50**
Job No.	1021253
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110450651	4/5/2021	Due upon receipt

Job No.	Job Date:	Balance
1021255	3/24/2021	$3569.17

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Amy Xu Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:Marie Harris					
Original	323.00	$4.60	$1485.80	$0.00	$1485.80
7 Day Expedite					$594.32
Copy w/ Original	1.00	Minimum	$0.00	$0.00	$0.00
Exhibit	835.00	$0.55	$459.25	$0.00	$459.25
Full Day Per Diem	1.00	$150.00	$150.00	$0.00	$150.00
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
Rough Draft	263.00	$1.60	$420.80	$0.00	$420.80
Video Pages	263.00	$0.50	$131.50	$0.00	$131.50
Handle/Process	1.00	$55.00	$55.00	$0.00	$55.00
Litigation Support Package-	1.00	$40.00	$40.00	$0.00	$40.00
Read & Sign	1.00	$25.00	$25.00	$0.00	$25.00
Overtime after 5:00 pm	0.50	$65.00	$32.50	$0.00	$32.50
InstantExhibit+ Per Deposition	1.00	$150.00	$150.00	$0.00	$150.00
(Taxable 0.00)					
			$2974.85	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$3569.17**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$3569.17**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110450651
Invoice Date:	4/5/2021
Total Due	**$3569.17**
Job No.	1021255
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110450787	4/6/2021	Due upon receipt

Job No.	Job Date:	Balance
1021260	3/25/2021	$4724.27

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Amy Xu Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:Anna Reddy					
Original	358.00	$4.60	$1646.80	$0.00	$1646.80
2 Day Expedite					$1482.12
Copy w/ Original	1.00	Minimum	$0.00	$0.00	$0.00
Exhibit	1322.00	$0.55	$727.10	$0.00	$727.10
Full Day Per Diem	1.00	$150.00	$150.00	$0.00	$150.00
Color Exhibits	226.00	$1.00	$226.00	$0.00	$226.00
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
Video Pages	297.00	$0.50	$148.50	$0.00	$148.50
Handle/Process	1.00	$55.00	$55.00	$0.00	$55.00
Litigation Support Package-	1.00	$40.00	$40.00	$0.00	$40.00
Read & Sign	1.00	$25.00	$25.00	$0.00	$25.00
Overtime after 5:00 pm	0.75	$65.00	$48.75	$0.00	$48.75
InstantExhibit+ Per Deposition	1.00	$150.00	$150.00	$0.00	$150.00
RemoteDepo (Virtual Room)	1.00	Minimum	$0.00	$0.00	$0.00
(Taxable 0.00)					
			$3242.15	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$4724.27**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$4724.27**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110450787
Invoice Date:	4/6/2021
Total Due	**$4724.27**
Job No.	1021260
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110451664	4/9/2021	1021250
Job Date	**Case No.**	
3/17/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner, et al. v. Brookdale Senior Living, Inc., et al.		
Payment Terms		
Due upon receipt		

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

VIDEOTAPE SERVICES

Theresa Ward -- (VIDEO)

*Videotape Services	8.00 Hours	@	150.00	1,200.00
Video Additional Hours (Overtime)			225.00	225.00
Delivery			25.00	25.00
TOTAL DUE >>>				**$1,450.00**
AFTER 5/24/2021 PAY				$1,667.50

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110451664
Invoice Date : 4/9/2021
Total Due : $1,450.00
AFTER 5/24/2021 PAY $1,667.50

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1021250
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner, et al. v. Brookdale Senior Living, Inc., et al.

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110451842	4/9/2021	Due upon receipt

Job No.	Job Date:	Balance
1021256	3/24/2021	$1337.50

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Amy Xu Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: VIDEOTAPE SERVICESMarie Harris -- (VIDEO)					
*Videotape Services	8.00	$150.00	$1200.00	$0.00	$1200.00
Video Additional Hours (Overtime)	0.50	$225.00	$112.50	$0.00	$112.50
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
(Taxable 0.00)					
			$1337.50	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$1337.50**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$1337.50**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Amy Xu
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110451842
Invoice Date:	4/9/2021
Total Due	**$1337.50**
Job No.	1021256
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110459087	5/2/2021	Due upon receipt

Job No.	Job Date:	Balance
1030300	4/16/2021	$2026.35

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:Ferdinand Augustus Buot, Jr.					
Original	310.00	$4.80	$1488.00	$0.00	$1488.00
Copy w/ Original	1.00	Minimum	$0.00	$0.00	$0.00
Exhibit	67.00	$0.55	$36.85	$0.00	$36.85
Full Day Per Diem	1.00	$150.00	$150.00	$0.00	$150.00
Color Exhibits	15.00	$1.00	$15.00	$0.00	$15.00
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
Video Pages	253.00	$0.50	$126.50	$0.00	$126.50
Handle/Process	1.00	$55.00	$55.00	$0.00	$55.00
Litigation Support Package-	1.00	$40.00	$40.00	$0.00	$40.00
Read & Sign	1.00	$25.00	$25.00	$0.00	$25.00
Overtime before 9:00 am	1.00	$65.00	$65.00	$0.00	$65.00
RemoteDepo (Virtual Room)	1.00	Minimum	$0.00	$0.00	$0.00
(Taxable 0.00)					
			$2026.35	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$2026.35**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$2026.35**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110459087
Invoice Date:	5/2/2021
Total Due	**$2026.35**
Job No.	1030300
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110461568	5/12/2021	1030302
Job Date	**Case No.**	
4/16/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

VIDEOTAPE SERVICES

Ferdinand Buot -- VIDEO

*Videotape Services	6.75 Hours	@	150.00	1,012.50
Video Additional Hours (Overtime)			225.00	225.00
Delivery			25.00	25.00
TOTAL DUE >>>				**$1,262.50**
AFTER 6/26/2021 PAY				$1,451.88

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110461568
Invoice Date : 5/12/2021
Total Due : $1,262.50
AFTER 6/26/2021 PAY $1,451.88

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1030302
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110472978	6/17/2021	Due upon receipt

Job No.	Job Date:	Balance
1051996	6/9/2021	$1815.50

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:Kevin Wayne Bowman					
Original	202.00	$4.60	$929.20	$0.00	$929.20
Copy w/ Original	1.00	Minimum	$0.00	$0.00	$0.00
Exhibit	136.00	$0.55	$74.80	$0.00	$74.80
Full Day Per Diem	1.00	$150.00	$150.00	$0.00	$150.00
Color Exhibits	20.00	$1.00	$20.00	$0.00	$20.00
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
Rough Draft	165.00	$1.60	$264.00	$0.00	$264.00
Video Pages	165.00	$0.50	$82.50	$0.00	$82.50
Handle/Process	1.00	$55.00	$55.00	$0.00	$55.00
Litigation Support Package-	1.00	$40.00	$40.00	$0.00	$40.00
Read & Sign	1.00	$25.00	$25.00	$0.00	$25.00
InstantExhibit+ Per Deposition	1.00	$150.00	$150.00	$0.00	$150.00
RemoteDepo (Virtual Room)	1.00	Minimum	$0.00	$0.00	$0.00
(Taxable 0.00)					
			$1815.50	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$1815.50**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$1815.50**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110472978
Invoice Date:	6/17/2021
Total Due	**$1815.50**
Job No.	1051996
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110474616	6/19/2021	1052029
Job Date	**Case No.**	
6/9/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

VIDEOTAPE SERVICES

30(b)(6): Brookdale for Topic 11 -- (VIDEO)

*Videotape Services	5.25 Hours	@	150.00	787.50
Delivery			25.00	25.00
			TOTAL DUE >>>	**$812.50**
			AFTER 8/3/2021 PAY	$934.38

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110474616
Invoice Date : 6/19/2021
Total Due : $812.50
AFTER 8/3/2021 PAY $934.38

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1052029
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110475642	6/23/2021	1051997
Job Date	**Case No.**	
6/17/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

PMK/Brookdale for Topic 16 Kevin Bowman	141.00	Pages	@	4.60	648.60
2 Day Expedite					583.74
Delivery				25.00	25.00
Rough Draft	112.00	Pages	@	1.60	179.20
Video Pages	112.00	Pages	@	0.50	56.00
Handle/Process				55.00	55.00
Litigation Support Package-				40.00	40.00
Overtime after 5:00 pm	0.25	Hours	@	65.00	16.25
			TOTAL DUE >>>		**$1,603.79**
			AFTER 8/7/2021 PAY		$1,844.36

Client Matter No. : 1457-1

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110475642
Invoice Date : 6/23/2021
Total Due : $1,603.79
AFTER 8/7/2021 PAY $1,844.36

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1051997
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110475640	6/23/2021	1051997
Job Date	**Case No.**	
6/17/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

ORIGINAL AND 1 CERTIFIED COPY OF TRANSCRIPT OF:

PMK/Brookdale re Topic 10 - Kevin Bowman	181.00	Pages	@	4.60	832.60
2 Day Expedite					749.34
Exhibit	55.00	Pages	@	0.55	30.25
Full Day Per Diem				150.00	150.00
Color Exhibits	30.00	Pages	@	1.00	30.00
Delivery				25.00	25.00
Rough Draft	144.00	Pages	@	1.60	230.40
Video Pages	144.00	Pages	@	0.50	72.00
Handle/Process				55.00	55.00
Litigation Support Package-				40.00	40.00
Reporter Attendance Fee (2 hour min.)	8.25		@	0.00	0.00
RemoteDepo (Virtual Room)				0.00	0.00
			TOTAL DUE >>>		**$2,214.59**
			AFTER 8/7/2021 PAY		$2,546.78

Client Matter No. : 1457-1

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110475640
Invoice Date : 6/23/2021
Total Due : $2,214.59
AFTER 8/7/2021 PAY $2,546.78

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1051997
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110476305	6/25/2021	1052027
Job Date	**Case No.**	
6/3/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

VIDEOTAPE SERVICES

30(b)(6)/Brookdale for Topic 3 -- (VIDEO)

*Videotape Services	3.00 Hours	@	150.00	450.00
Delivery			25.00	25.00
			TOTAL DUE >>>	**$475.00**
			AFTER 8/9/2021 PAY	$546.25

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110476305
Invoice Date : 6/25/2021
Total Due : $475.00
AFTER 8/9/2021 PAY $546.25

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1052027
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

INVOICE

U.S. Legal Support - SF
201 Mission Street
Suite 600
San Francisco CA 94105
Phone:415-362-4346 Fax:415-362-4495

Invoice No.	Invoice Date	Job No.
110477218	6/30/2021	1052032
Job Date	**Case No.**	
6/17/2021	17CV03962HSGLB	
Case Name		
Stacia Stiner v. Brookdale Senior Living, Inc.		
Payment Terms		
Due upon receipt		

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Kevin Bowman PMK/Brookdale re Topic 16; 30(b)(6)/Brookdale for Topic 10 (VIDEO)

*Videotape Services	8.00	Hours	@ 150.00	1,200.00
			TOTAL DUE >>>	**$1,200.00**
			AFTER 8/14/2021 PAY	$1,380.00

Client Matter No. : 1457-1

Online bill pay available at www.uslegalsupport.com

Tax ID: 76-0523238 Phone: 415-433-6830 Fax:

Please detach bottom portion and return with payment.

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Invoice No. : 110477218
Invoice Date : 6/30/2021
Total Due : $1,200.00
AFTER 8/14/2021 PAY $1,380.00

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Job No. : 1052032
BU ID : 45-SF
Case No. : 17CV03962HSGLB
Case Name : Stacia Stiner v. Brookdale Senior Living, Inc.

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date:	Payment Terms
110479245	7/8/2021	Due upon receipt

Job No.	Job Date:	Balance
1050386	6/30/2021	$1337.50

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No

17CV03962HSGLB

U.S. Legal Support - SF
201 Mission StreetSuite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street
6th Floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
*U.S. Legal Support, Inc. - Remote Video Conference To log into this session, please utilize the link below.	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street 6th Floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Rate	Amount	Discount	Charges
Items Covered: VIDEOTAPE SERVICESSheila Garner (VIDEO)					
*Videotape Services	8.00	$150.00	$1200.00	$0.00	$1200.00
Video Additional Hours (Overtime)	0.50	$225.00	$112.50	$0.00	$112.50
Delivery	1.00	$25.00	$25.00	$0.00	$25.00
(Taxable 0.00)					
			$1337.50	$0.00	

Online bill pay available at www.uslegalsupport.com

Total Due	**$1337.50**
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Debits	**$0.00**
(=) New Balance	**$1337.50**

Tax ID : 76-0523238

Phone: 415-433-6830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Benjamin Bien-Kahn
Rosen, Bien, Galvan & Gruufeld
101 Mission Street6th Floor
San Francisco CA 94105

Invoice No.	110479245
Invoice Date:	7/8/2021
Total Due	**$1337.50**
Job No.	1050386
Case No:	17CV03962HSGLB

Remit To: **U S Legal Support, Inc.**
P.O. Box 4772
Houston TX 77210-4772

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5478920**
Invoice Date:	**12/29/2021**
Balance Due:	**$903.96**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4992966 | Job Date: 12/17/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw LLP

Witness: Jeanette Algarme , Vol 2	**Amount**
Transcript Services	$770.26
Exhibits	$57.20
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$903.96**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$903.96**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5478920**
Invoice Date:	**12/29/2021**
Balance Due:	**$903.96**

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5458578**
Invoice Date:	**12/31/2021**
Balance Due:	**$805.95**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4891842 | Job Date: 12/10/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw LLP

Witness: Jeanette Algarme	**Amount**
Transcript Services	$606.25
Exhibits	$83.20
Legal Administration Services	$40.00
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$805.95**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$805.95**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5458578**
Invoice Date:	**12/31/2021**
Balance Due:	**$805.95**

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Amy Xu
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5506305**
Invoice Date:	**1/11/2022**
Balance Due:	**$2,330.40**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4983505 | Job Date: 12/13/2021 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Amy Xu

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw LLP

Witness: Bernie Jestrabek-Hart	**Amount**
Transcript Services	$1,488.45
Exhibits	$157.95
Rough Draft	$607.50
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$2,330.40**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$2,330.40**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #: **5506305**
Invoice Date: **1/11/2022**
Balance Due: **$2,330.40**

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5524444**
Invoice Date:	**1/24/2022**
Balance Due:	**$1,169.45**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4959318 | Job Date: 1/13/2022 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw LLP

Witness: Michele Lytle	**Amount**
Transcript Services	$1,052.65
Exhibits	$40.30
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$1,169.45**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,169.45**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5524444**
Invoice Date:	**1/24/2022**
Balance Due:	**$1,169.45**

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5548006**
Invoice Date:	**2/1/2022**
Balance Due:	**$1,240.80**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4959346 | Job Date: 1/14/2022 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw LLP

Witness: Patricia Lindstrom	**Amount**
Transcript Services	$1,129.85
Exhibits	$34.45
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$1,240.80**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,240.80**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5548006**
Invoice Date:	**2/1/2022**
Balance Due:	**$1,240.80**

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5549151**
Invoice Date:	**2/1/2022**
Balance Due:	**$1,261.10**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4959438 | Job Date: 1/25/2022 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw LLP

Witness: Ralph Carlson	**Amount**
Transcript Services	$1,055.90
Exhibits	$128.70
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$1,261.10**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,261.10**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5549151**
Invoice Date:	**2/1/2022**
Balance Due:	**$1,261.10**

103356

Veritext Corporate Services LLC

VERITEXT LEGAL SOLUTIONS

Bill To: Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco CA 94105

Remit To: Veritext
P.O. Box 71303
Chicago IL 60694-1303

Statement of Account

For questions regarding this statement please contact Mireya Rodriguez at 1-800-955-2421 or finance@veritext.com

Statement Date: 3/6/2022								Total Balance Due: $1,357.40
Invoice #	**Invoice Date**	**Job #**	**Job Date**	**Caption**	**Contact**	**Type**	**Aged**	**Balance Due**
5575816	2/16/2022	4959179	1/11/2022	Stiner, Et Al v Brookdale Senior Living Inc Et Al	Amy Xu	C	18	$1,357.40
							Total:	$1,357.40

Current	31-60 Days	61-90 Days	> 90 Days	Total
$1,357.40	$0.00	$0.00	$0.00	$1,357.40

Please Remit Payment To: Veritext
P.O. Box 71303
Chicago IL 60694-1303

Fed. Tax ID: 20-3457913

Visa, Mastercard & American Express Accepted

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments or refunds will be made after 90 days.

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Amy Xu
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5575816**
Invoice Date:	**2/16/2022**
Balance Due:	**$1,357.40**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4959179 | Job Date: 1/11/2022 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Amy Xu

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw LLP

Witness: Loresia Valette	**Amount**
Transcript Services	$1,230.85
Exhibits	$50.05
Veritext Exhibit Package (ACE)	$48.50
Delivery and Handling	$28.00

Notes:

Invoice Total:	**$1,357.40**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,357.40**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5575816**
Invoice Date:	**2/16/2022**
Balance Due:	**$1,357.40**

103356

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20220150975-11	4/15/2022	Net 30

Job No.	Job Date	Balance
6121265	4/11/2022	$797.38

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
201 Mission Street # Suite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
U.S. Legal Support - Remote Videoconference	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
Items Covered: General				
RemoteDepo (Virtual Room via USLS Office)	1.00	Hours	$175.00	$175.00
Reporter Appearance Fee Per Half Day	1.00	N/A	$125.00	$125.00
Waiting Time	0.25	Hours	$97.50	$24.38
ORIGINAL TRANSCRIPT OF: Bennie Williams				
Original	43.00	Pages	Minimum	$370.00
Exhibits (Color)	5.00	Pages	$1.00	$5.00
Shipping of Hard Copy Original, Copy, or Media - Standard	1.00	N/A	$25.00	$25.00
Transcript Handling & Processing	1.00	N/A	$55.00	$55.00
Video Pages	36.00	Pages	$0.50	$18.00

Total Due	**$797.38**
AFTER 5/30/2022 PAY	$797.38
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$797.38**

Tax ID : 76-0523238

Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Jenny Yelin
Rosen, Bien, Galvan & Grunfeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20220150975-11	**Invoice Date**	4/15/2022
Job No.	6121265	**Case No.**	17CV03962HSGLB
Total Due	**$797.38**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20220151676-11	4/18/2022	Net 30

Job No.	Job Date	Balance
6121265	4/11/2022	$428.50

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
201 Mission Street # Suite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
U.S. Legal Support - Ontario (Rancho Cucamonga) 3281 East Guasti Road 7th Floor Ontario CA 91761	Jenny Yelin Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
VIDEOGRAPHY SERVICES OF: General				
Laptop/Tablet Rental	1.00	N/A	$75.00	$75.00
Mileage	118.00	N/A	$0.75	$88.50
VIDEOGRAPHY SERVICES OF: Bennie Williams				
Media Stock	1.00	N/A	$25.00	$25.00
Professional Legal Videography	1.00	Hours	$195.00	$195.00
Video Technology Package	1.00	N/A	$45.00	$45.00
		Total Due		**$428.50**
		AFTER 6/2/2022 PAY		$428.50
		(-) Payments/Credits		**$0.00**
		(+) Finance Charges/Late Fees		**$0.00**
		(=) New Balance		**$428.50**

Tax ID : 76-0523238

Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20220151676-11	**Invoice Date**	4/18/2022
Job No.	6121265	**Case No.**	17CV03962HSGLB
Total Due	**$428.50**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20220161409-11	4/28/2022	Net 30

Job No.	Job Date	Balance
6123596	4/18/2022	$330.00

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
201 Mission Street # Suite 600
San Francisco CA 94105
Phone: 415-362-4346 Fax: 415-362-4495

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
Superior Management & Realty Services, Inc. 15820 Whittier Boulevard Whittier CA 90603	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
VIDEO LATE CANCELLATION: General				
Travel Expenses	1.00	N/A	$50.00	$50.00
VIDEO LATE CANCELLATION: Verlene Thompson				
Video Late Cancellation	1.00	N/A	$280.00	$280.00

Total Due	**$330.00**
AFTER 6/12/2022 PAY	$330.00
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$330.00**

Tax ID : 76-0523238

Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20220161409-11	**Invoice Date**	4/28/2022
Job No.	6123596	**Case No.**	17CV03962HSGLB
Total Due	**$330.00**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

Veritext, LLC - California Region
Tel. 877-955-3855 Email: calendar-sf@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5750128**
Invoice Date:	**4/30/2022**
Balance Due:	**$587.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 5174608 | Job Date: 4/22/2022 | Delivery: Normal

Location: Costa Mesa, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Benjamin Bien-Kahn | Rosen Bien Galvan & Grunfeld LLP

Witness: Carl Mariz	**Amount**
Video Services	$537.00
Delivery and Handling	$50.00

Notes: Matter # 1457-01

Invoice Total:	**$587.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$587.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5750128**
Invoice Date:	**4/30/2022**
Balance Due:	**$587.00**

103356

Veritext, LLC - California Region
Tel. 877-955-3855 Email: calendar-sf@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5762461**
Invoice Date:	**5/5/2022**
Balance Due:	**$1,791.17**

Case: Stiner v. Brookdale (4:17cv3962) **Proceeding Type: Depositions**

Job #: 5197077 | Job Date: 4/29/2022 | Delivery: Expedited

Location: Ontario, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Benjamin Bien-Kahn | Rosen Bien Galvan & Grunfeld LLP

Witness: Margaret (Marjory) Stitt	**Quantity**	**Amount**
Original with 1 Certified Transcript	111.00	$660.45
Transcript - Expedited	111.00	$466.20
Exhibits	12.00	$7.80
Surcharge - Video Proceeding	111.00	$55.50
Litigation Package-Secure File Suite	1.00	$55.00
Production & Processing	1.00	$50.00
Conference Suite & Amenities	1.00	$311.22
Attendance (Half Day)	1.00	$150.00
Electronic Delivery and Handling	1.00	$35.00

Notes:

Invoice Total:	**$1,791.17**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,791.17**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5762461**
Invoice Date:	**5/5/2022**
Balance Due:	**$1,791.17**

103356

Veritext, LLC - California Region
Tel. 877-955-3855 Email: calendar-sf@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5777266**
Invoice Date:	**5/12/2022**
Balance Due:	**$965.00**

Case: Stiner v. Brookdale (4:17cv3962) **Proceeding Type: Depositions**

Job #: 5197077 | Job Date: 4/29/2022 | Delivery: Normal

Location: Ontario, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Benjamin Bien-Kahn | Rosen Bien Galvan & Grunfeld LLP

Witness: Margaret (Marjory) Stitt	**Amount**
Video Services	$915.00
Delivery and Handling	$50.00

Notes: Matter # 1457-01

Invoice Total:	**$965.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$965.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5777266**
Invoice Date:	**5/12/2022**
Balance Due:	**$965.00**

103356

Veritext, LLC - California Region
Tel. 877-955-3855 Email: calendar-sf@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**5784816**
Invoice Date:	**5/16/2022**
Balance Due:	**$859.00**

Case: Stiner v. Brookdale (4:17cv3962) **Proceeding Type: Depositions**

Job #: 5196983 | Job Date: 4/29/2022 | Delivery: Normal

Location: Folsom, CA

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Benjamin Bien-Kahn | Rosen Bien Galvan & Grunfeld LLP

Witness: Carolyn Toolen	**Amount**
Video Services	$759.00
Delivery and Handling	$50.00
Expenses	$50.00

Notes: Matter # 1457-01

Invoice Total:	**$859.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$859.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Pay by Check - Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name: BMO Harris Bank
A/C #: 4353454 ABA: 071000288
SWIFT: HATRUS44
Pay by Credit Card: www.veritext.com

Invoice #:	**5784816**
Invoice Date:	**5/16/2022**
Balance Due:	**$859.00**

103356

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20220224551-11	7/29/2022	Net 30

Job No.	Job Date	Balance
6121354	4/12/2022	$280.00

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 415-362-4346 Fax: 415-362-4495

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
U.S. Legal Support - Ontario (Rancho Cucamonga) 3281 East Guasti Road 7th Floor Ontario CA 91761	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
VIDEO LATE CANCELLATION: Barbara Steed				
Video Late Cancellation	1.00	N/A	$280.00	$280.00

Total Due	**$280.00**
AFTER 9/12/2022 PAY	$280.00
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$280.00**

Tax ID : 76-0523238 Nevada Firm Registration # 067F Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com

"Please detach bottom portion and return with payment."

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20220224551-11	**Invoice Date**	7/29/2022
Job No.	6121354	**Case No.**	17CV03962HSGLB
Total Due	**$280.00**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20220226099-11	7/29/2022	Net 30

Job No.	Job Date	Balance
6124091	4/19/2022	$280.00

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 415-362-4346 Fax: 415-362-4495

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
La Mirada Business Center 14241 Firestone Boulevard # 400 La Mirada CA 90638	Benjamin Bien-Kahn Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured:

Services/Items	Units	Type	Rate	Charges
VIDEOGRAPHY SERVICES OF: Aurora Deaux				
Video Late Cancellation	1.00	N/A	$280.00	$280.00

Total Due	**$280.00**
AFTER 9/12/2022 PAY	$280.00
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$280.00**

Tax ID : 76-0523238 Nevada Firm Registration # 067F Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Jenny Yelin
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20220226099-11	**Invoice Date**	7/29/2022
Job No.	6124091	**Case No.**	17CV03962HSGLB
Total Due	**$280.00**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 934503

Deposition - Dimple Kamdar (Mar 28, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al. v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 918959
Ordered by: Amy Xu - ROSEN BIEN GALVAN & GRUNFELD LLP

Invoice date: 4/3/2024
Terms: Net 30
Due date: 5/3/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$2,698.15	1	$2,698.15
			Total	$2,698.15
			Payments	$0.00
			Amount remaining due	$2,698.15

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/7ampyhe4**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 942210

Deposition - LUANA WILLIAMS - C.N.A (Mar 25, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 916962
Ordered by: Amy Xu - ROSEN BIEN GALVAN & GRUNFELD LLP

Invoice date: 4/9/2024
Terms: Net 30
Due date: 5/9/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Videographer Late Cancellation)		$834.10	1	$834.10
			Total	$834.10
			Payments	$0.00
			Amount remaining due	$834.10

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/d8vhc3kc**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 958476

Deposition - JOHN BEATY (Mar 20, 2024)

Bill to

ATTN: Adrienne Spiegel
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al. v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 900014

Invoice date: 4/18/2024
Terms: Net 30
Due date: 5/18/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$776.30	1	$776.30
			Total	$776.30
			Payments	$0.00
			Amount remaining due	$776.30

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/q8wii2f8**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 958472

Deposition - DIANA KAUFELDT (Mar 20, 2024)

Bill to

ATTN: Adrienne Spiegel
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al. v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 900012

Invoice date: 4/18/2024
Terms: Net 30
Due date: 5/18/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$1,253.05	1	$1,253.05
			Total	$1,253.05
			Payments	$0.00
			Amount remaining due	$1,253.05

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/yw8piaok**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 961700

Deposition - VALENTINE MATHANGANI (Apr 17, 2024)

Bill to

ATTN: Benjamin Bien-Kahn
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al. v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 947235

Invoice date: 4/22/2024
Terms: Net 30
Due date: 5/22/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Expedited Legal Support Services (Expedited Transcripts, Video, Reporter Appearance)		$2,467.75	1	$2,467.75
			Total	$2,467.75
			Payments	$0.00
			Amount remaining due	$2,467.75

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/mf4amt7m**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 963876

Deposition - KELLI ZAHNER (Apr 4, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al. v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 908120
Ordered by: Amy Xu - ROSEN BIEN GALVAN & GRUNFELD LLP

Invoice date: 4/23/2024
Terms: Net 30
Due date: 5/23/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$1,490.05	1	$1,490.05
			Total	$1,490.05
			Payments	$0.00
			Amount remaining due	$1,490.05

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/o3hq6wvw**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 968478

Deposition - JENNIFER GORDON-ALVAREZ (Apr 19, 2024)

Bill to

ATTN: Benjamin Bien-Kahn
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 947238
Ordered by: Karen Stilber - ROSEN BIEN GALVAN & GRUNFELD LLP

Invoice date: 4/25/2024
Terms: Net 30
Due date: 5/25/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Expedited Legal Support Services (Expedited Transcripts, Reporter Appearance, Video)		$3,033.10	1	$3,033.10
			Total	$3,033.10
			Payments	$0.00
			Amount remaining due	$3,033.10

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/q6ahyp3b**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 976228

Deposition - ANN WAHL (Apr 16, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 932350

Invoice date: 5/1/2024
Terms: Net 30
Due date: 5/31/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$1,788.80	1	$1,788.80
			Total	$1,788.80
			Payments	$0.00
			Amount remaining due	$1,788.80

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/gizt10c8**

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 992674

Deposition - Carole Presley (Apr 26, 2024)

Bill to

ATTN: Adrienne Spiegel
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105-1738

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 956454

Invoice date: 5/13/2024
Terms: Net 30
Due date: 6/12/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Transcripts, Reporter Appearance, Video)		$1,708.05	1	$1,708.05
			Total	$1,708.05
			Payments	$0.00
			Amount remaining due	$1,708.05

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at **(888) 707-8366** or emailing us at **ar@steno.com**.

Payment instructions

Need our W9? Please visit **https://steno.com/w9**
Pay online: **https://steno.com/pay/llzfow30**

Please make checks payable to Steno.

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7551862**
Invoice Date:	**7/11/2024**
Balance Due:	**$508.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4992966 | Job Date: 12/17/2021 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw, LLP

Witness: Jeanette Algarme , Vol 2	**Amount**
Video Services	$420.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$508.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$508.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7551862
Invoice Date: 7/11/2024
Balance Due: $508.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7551863**
Invoice Date:	**7/11/2024**
Balance Due:	**$508.00**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 4891842 | Job Date: 12/10/2021 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw, LLP

Witness: Jeanette Algarme	**Amount**
Video Services	$420.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$508.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$508.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7551863
Invoice Date: 7/11/2024
Balance Due: $508.00

Veritext, LLC - Florida Region
Tel. 305-376-8800 Email: billing-fl@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Benjamin Bien-Kahn
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7607672**
Invoice Date:	**8/2/2024**
Balance Due:	**$1,653.87**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 6795058 | Job Date: 7/18/2024 | Delivery: Normal

Location: Fort Lauderdale, FL

Billing Atty: Benjamin Bien-Kahn

Scheduling Atty: Erica Rutner | Moore & Lee

Witness: Cristina Flores, RN, Ph.d.	**Amount**
Video Services	$760.00

Witness: Cristina Flores, RN, Ph.d. , PIP	**Amount**
Video Services	$760.00

Non Witness Specific Charges	**Amount**
Video - Electronic Access	$85.00

Notes:

Invoice Total:	**$1,605.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$48.87**
Balance Due:	**$1,653.87**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

THIS INVOICE IS 61 DAYS PAST DUE, PLEASE REMIT - THANK YOU

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7607672
Invoice Date: 8/2/2024
Balance Due: $1,653.87

B420241002

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Jenny S Yelin Esq
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7702510**
Invoice Date:	**9/12/2024**
Balance Due:	**$2,704.35**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 6878858 | Job Date: 9/5/2024 | Delivery: Expedited

Location: Fort Lauderdale, FL

Billing Atty: Jenny S Yelin Esq

Scheduling Atty: Erica Rutner | Moore & Lee

Witness: Alex Barchuk	**Amount**
Transcript Services	$2,317.95
Exhibits	$106.40
Logistics, Processing & Electronic Files	$181.00
Smart Summary - Over 100 Transcript Pages	$99.00

Notes:

Invoice Total:	**$2,704.35**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$2,704.35**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7702510
Invoice Date: 9/12/2024
Balance Due: $2,704.35

Veritext, LLC - Midwest Region
Tel. 312.442.9087 Email: billing-midwest@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Christopher Walker
Schneider Wallace Cottrell Konecky LLP
2000 Powell Street
Suite 1400
Emeryville, CA, 94608

Invoice #:	**7713275**
Invoice Date:	**9/16/2024**
Balance Due:	**$2,260.33**

Case: Stiner, Stacia, Et Al. v. Brookdale Senior Living, Inc., Et Al. (4:17cv3962HSG) — **Proceeding Type: Depositions**

Job #: 6867683 | Job Date: 9/6/2024 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Travis Close

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: June Isaacson Kailes	**Quantity**	**Price**	**Amount**
Transcript Services - Certified Transcript	251.00	$3.55	$891.05
Transcript Services - Certified Transcript - Priority Request	251.00	$1.98	$496.98
Transcript - Supplemental Surcharges*	251.00	$0.40	$100.40
Rough Draft	251.00	$1.85	$464.35
Exhibits	121.00	$0.55	$66.55
Veritext Exhibit Package (ACE)	1.00	$52.00	$52.00
Secure Hosting & Delivery of Veritext File Suite	1.00	$90.00	$90.00
Smart Summary - Over 100 Transcript Pages	1.00	$99.00	$99.00

Notes: *Supplemental Surcharges Include: Video Proceeding, Virtual Proceeding

Invoice Total:	**$2,260.33**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$2,260.33**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7713275
Invoice Date: 9/16/2024
Balance Due: $2,260.33

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Christopher Walker, Guy B. Wallace
Schneider Wallace Cottrell Konecky LLP
2000 Powell Street
Suite 1400
Emeryville, CA, 94608

Invoice #: 7682866
Invoice Date: 9/9/2024
Balance Due: $4,039.75

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 6880494 | Job Date: 8/30/2024 | Delivery: Daily

Location: Los Angeles, CA

Billing Atty: Mark T. Johnson

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: Gary Waters	Quantity	Price	Amount
Transcript Services - Certified Transcript	360.00	$3.55	$1,278.00
Transcript Services - Certified Transcript - Priority Request	360.00	$3.95	$1,422.00
Transcript - Supplemental Surcharges*	360.00	$0.40	$144.00
Rough Draft	360.00	$1.85	$666.00
Exhibits	525.00	$0.55	$288.75
Veritext Exhibit Package (ACE)	1.00	$52.00	$52.00
Secure Hosting & Delivery of Veritext File Suite	1.00	$90.00	$90.00
Smart Summary - Over 100 Transcript Pages	1.00	$99.00	$99.00

Notes: *Supplemental Surcharges Include: Video Proceeding, Virtual Proceeding

Invoice Total:	**$4,039.75**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$4,039.75**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7682866
Invoice Date: 9/9/2024
Balance Due: $4,039.75

Veritext, LLC - Midwest Region
Tel. 312.442.9087 Email: billing-midwest@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Christopher Walker
Schneider Wallace Cottrell Konecky LLP
2000 Powell Street
Suite 1400
Emeryville, CA, 94608

Invoice #: 7687356
Invoice Date: 9/5/2024
Balance Due: $3,012.15

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 6880502 | Job Date: 9/3/2024 | Delivery: Daily Client/Matter #: 101330

Location: Los Angeles, CA
Billing Atty: Mark T. Johnson
Scheduling Atty: | Seyfarth Shaw, LLP

Witness: Jeffrey Mastin	Quantity	Price	Amount
Transcript Services - Certified Transcript	266.00	$3.55	$944.30
Transcript Services - Certified Transcript - Priority Request	266.00	$3.95	$1,050.70
Transcript - Supplemental Surcharges*	266.00	$0.40	$106.40
Rough Draft	266.00	$1.85	$492.10
Exhibits	323.00	$0.55	$177.65
Veritext Exhibit Package (ACE)	1.00	$52.00	$52.00
Secure Hosting & Delivery of Veritext File Suite	1.00	$90.00	$90.00
Smart Summary - Over 100 Transcript Pages	1.00	$99.00	$99.00

Notes: *Supplemental Surcharges Include: Video Proceeding, Virtual Proceeding

Invoice Total:	**$3,012.15**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$3,012.15**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7687356
Invoice Date: 9/5/2024
Balance Due: $3,012.15

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Christopher Walker and Travis Close
Schneider Wallace Cottrell Konecky LLP
2000 Powell Street
Suite 1400
Emeryville, CA, 94608

Invoice #:	**7716380**
Invoice Date:	**9/17/2024**
Balance Due:	**$3,778.50**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 6894381 | Job Date: 9/12/2024 | Delivery: Expedited Client/Matter #: 101330

Location: Fort Lauderdale, FL

Billing Atty: Mark T. Johnson

Scheduling Atty: Erica Rutner | Moore & Lee

Witness: Douglas J. Cross	**Quantity**	**Price**	**Amount**
Transcript Services - Certified Transcript	309.00	$3.95	$1,220.55
Transcript Services - Certified Transcript - Priority Request	309.00	$4.50	$1,390.50
Transcript - Supplemental Surcharges*	309.00	$0.55	$169.95
Rough Draft	309.00	$2.50	$772.50
Secure Hosting & Delivery of Veritext File Suite	1.00	$91.00	$91.00
Logistics & Processing	1.00	$35.00	$35.00
Smart Summary - Over 100 Transcript Pages	1.00	$99.00	$99.00

Notes: *Supplemental Surcharges Include: Video Proceeding

Invoice Total:	**$3,778.50**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$3,778.50**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7716380
Invoice Date: 9/17/2024
Balance Due: $3,778.50

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Christopher Walker
Schneider Wallace Cottrell Konecky LLP
2000 Powell Street
Suite 1400
Emeryville, CA, 94608

Invoice #:	**7768780**
Invoice Date:	**10/8/2024**
Balance Due:	**$1,270.90**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 6952607 | Job Date: 10/4/2024 | Delivery: Daily

Location: Fort Lauderdale, FL

Billing Atty: Guy B. Wallace

Scheduling Atty: Erica Rutner | Moore & Lee

Witness: Dr. Patrick Kennedy	**Quantity**	**Price**	**Amount**
Transcript Services - Certified Transcript	84.00	$3.95	$331.80
Transcript Services - Certified Transcript - Priority Request	84.00	$4.95	$415.80
Transcript - Supplemental Surcharges*	84.00	$0.55	$46.20
Rough Draft	84.00	$2.50	$210.00
Exhibits	53.00	$0.70	$37.10
Veritext Exhibit Package (ACE)	1.00	$55.00	$55.00
Secure Hosting & Delivery of Veritext File Suite	1.00	$91.00	$91.00
Logistics & Processing	1.00	$35.00	$35.00
Smart Summary - Under 100 Transcript Pages	1.00	$49.00	$49.00

Notes: *Supplemental Surcharges Include: Video Proceeding

Invoice Total:	**$1,270.90**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,270.90**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7768780
Invoice Date: 10/8/2024
Balance Due: $1,270.90

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1279891

Deposition - Carole Presley (Apr 26, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 956454

Invoice date: 11/5/2024
Terms: Net 30
Due date: 12/6/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$140.00	1	$140.00
			Total	$140.00
			Payments	$0.00
			Amount remaining due	$140.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/ap2dooub

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1279904

Deposition - NIARE FEASTER (Apr 25, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 946146

Invoice date: 11/5/2024
Terms: Net 30
Due date: 12/6/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$227.50	1	$227.50
			Total	$227.50
			Payments	$0.00
			Amount remaining due	$227.50

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/l8mgcz5u

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1279891

Deposition - Carole Presley (Apr 26, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 956454

Invoice date: 11/5/2024
Terms: Net 30
Due date: 12/6/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$140.00	1	$140.00
			Total	$140.00
			Payments	$70.00
			Amount remaining due	$70.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/ap2dooub

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1407761

Deposition - JENNIFER GORDON-ALVAREZ (Apr 19, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 947238

Invoice date: 1/16/2025
Terms: Net 30
Due date: 2/16/2025
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Shipping and Handling)		$420.00	1	$420.00
			Total	$420.00
			Payments	$210.00
			Amount remaining due	$210.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

Printing for 932359 900012 900014 908120 1196502 1203480 1150273 1189852 946146 956454 918959 947238

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/r3ln743a

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1279904

Deposition - NIARE FEASTER (Apr 25, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 946146

Invoice date: 11/5/2024
Terms: Net 30
Due date: 12/6/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Text to Video Sync Hourly Fee		$35.00	6.5	$227.50
			Total	$227.50
			Payments	$113.75
			Amount remaining due	$113.75

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/l8mgcz5u

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1296522

Deposition - Dimple Kamdar (Mar 28, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 918959

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/14/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$218.75	1	$218.75
			Total	$218.75
			Payments	$0.00
			Amount remaining due	$218.75

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/a2c2s3ft

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1298073

Deposition - JENNIFER GORDON-ALVAREZ (Apr 19, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 947238

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/14/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$210.00	1	$210.00
			Total	$210.00
			Payments	$0.00
			Amount remaining due	$210.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/k4tem1f9

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1298082

Deposition - JOSH ALLEN (Sep 4, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 1150273

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/14/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Certified Copy Transcripts, Video)		$2,097.05	1	$2,097.05
			Total	$2,097.05
			Payments	$0.00
			Amount remaining due	$2,097.05

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/lq80a34a

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1298475

Deposition - JULIE BAIRD, R.N. (Sep 24, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 1189852

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/15/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Certified Copy Transcripts, Video)		$1,213.90	1	$1,213.90
			Total	$1,213.90
			Payments	$0.00
			Amount remaining due	$1,213.90

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/3f6sy24w

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1298483

Deposition - DOUGLAS JAY ANDERSON - VOL II (Sep 25, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 1203480

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/15/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$70.00	1	$70.00
			Total	$70.00
			Payments	$0.00
			Amount remaining due	$70.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/mo6vjrlw

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1298484

Deposition - DOUGLAS JAY ANDERSON (Sep 24, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 1196502

Invoice date: 11/14/2024
Terms: Net 30
Due date: 12/15/2024
Status: OPEN

Item	Description	Amount	Quantity	Total
Legal Support Services (Video)		$350.00	1	$350.00
			Total	$350.00
			Payments	$0.00
			Amount remaining due	$350.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/jkc1blnf

Please make checks payable to Steno.

Steno
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Invoice 1334211

Deposition - JOSH ALLEN (Sep 4, 2024)

Bill to

ATTN: Karen Stilber
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

Bill from

Steno Agency, Inc.
PO BOX 22637
Pasadena, CA 91185-2637
(888) 707-8366

Case name: STACIA STINER, et al., v BROOKDALE SENIOR LIVING, INC., et al.
Case number: 4:17-cv-03962-HSG (LB)
Job Id: 1150273

Invoice date: 12/5/2024
Terms: Net 30
Due date: 1/4/2025
Status: OPEN

Item	Description	Amount	Quantity	Total
Text to Video Sync Hourly Fee		$35.00	6	$210.00
			Total	$210.00
			Payments	$0.00
			Amount remaining due	$210.00

Invoice due date shall be 30 days from receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Steno may recover any fees and costs it incurs in collecting any unpaid amounts. Please contact us to correct billing errors using the contact information below. No adjustments will be made after 90 days.

Billing reference: Brookdale, 1457-1

We really appreciate your business and we hope you were satisfied with our service. If not, please let us know so that we can improve by calling us at (888) 707-8366 or emailing us at ar@steno.com.

Payment instructions

Need our W9? Please visit https://steno.com/w9
Pay online: https://steno.com/pay/x8rosy66

Please make checks payable to Steno.

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20240857075-11	12/11/2024	Net 30

Job No.	Job Date	Balance
4195617	3/25/2021	$1,849.38

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 415-777-2111 Fax: 415-362-4495

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
U.S. Legal Support providing link - RemoteDepo	Gay Grunfeld Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured: D/O/L: Adjuster:

Services/Items	Units	Type	Rate	Charges
VIDEOGRAPHY SERVICES OF: Anna Reddy -- (VIDEO)				
Media Stock	1.00	N/A	$25.00	$25.00
Professional Legal Videography	8.00	Hours	$195.00	$1,560.00
Video Non-Traditional Hours	0.75	Hours	$292.50	$219.38
Video Technology Package	1.00	N/A	$45.00	$45.00
Video File Client Portal Upload - No Charge	1.00	N/A	-	-

Total Due	**$1,849.38**
AFTER 1/25/2025 PAY	$2,126.79
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$1,849.38**

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20240857075-11	**Invoice Date**	12/11/2024
Job No.	4195617	**Case No.**	17CV03962HSGLB
Total Due	**$1,849.38**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20240857077-11	12/11/2024	Net 30

Job No.	Job Date	Balance
4196273	3/18/2021	$1,776.25

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 415-777-2111 Fax: 415-362-4495

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Job Location	Ordered By	Reference Info.
U.S. Legal Support providing link - RemoteDepo	Gay Grunfeld Rosen, Bien, Galvan & Gruufeld 101 Mission Street # 6th floor San Francisco CA 94105	Client Matter No: Claim No: Insured: D/O/L: Adjuster:

Services/Items	Units	Type	Rate	Charges
VIDEOGRAPHY SERVICES OF: Kimia Ataein -- (VIDEO)				
Media Stock	1.00	N/A	$25.00	$25.00
Professional Legal Videography	8.00	Hours	$195.00	$1,560.00
Video Non-Traditional Hours	0.50	Hours	$292.50	$146.25
Video Technology Package	1.00	N/A	$45.00	$45.00
Video File Client Portal Upload - No Charge	1.00	N/A	-	-

Total Due	**$1,776.25**
AFTER 1/25/2025 PAY	$2,042.69
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$1,776.25**

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 4154336830

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer. Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Gay Grunfeld
Rosen, Bien, Galvan & Gruufeld
101 Mission Street # 6th floor
San Francisco CA 94105

Invoice No.	20240857077-11	**Invoice Date**	12/11/2024
Job No.	4196273	**Case No.**	17CV03962HSGLB
Total Due	**$1,776.25**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

Veritext, LLC - Midwest Region
Tel. 312.442.9087 Email: billing-midwest@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #: 7936641
Invoice Date: 12/11/2024
Balance Due: $838.00

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 6880502 | Job Date: 9/3/2024 | Delivery: Normal

Location: Los Angeles, CA
Billing Atty: Karen Stilber
Scheduling Atty: | Seyfarth Shaw, LLP

Witness: Jeffrey Mastin	Amount
Video Services	$750.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$838.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$838.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936641
Invoice Date: 12/11/2024
Balance Due: $838.00

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936637**
Invoice Date:	**12/11/2024**
Balance Due:	**$1,488.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4989810 | Job Date: 12/14/2021 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw, LLP

Witness: Jeffrey S. Mastin	**Amount**
Video Services	$1,400.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,488.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,488.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936637
Invoice Date: 12/11/2024
Balance Due: $1,488.00

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7937656**
Invoice Date:	**12/13/2024**
Balance Due:	**$1,663.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4857460 | Job Date: 10/29/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw, LLP

Witness: Douglas J Cross	**Amount**
Video Services	$1,575.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,663.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,663.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7937656
Invoice Date: 12/13/2024
Balance Due: $1,663.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936635**
Invoice Date:	**12/11/2024**
Balance Due:	**$1,488.00**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962) **Proceeding Type: Depositions**

Job #: 4959346 | Job Date: 1/14/2022 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw, LLP

Witness: Patricia Lindstrom	**Amount**
Video Services	$1,400.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,488.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,488.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936635
Invoice Date: 12/11/2024
Balance Due: $1,488.00

103356

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7937657**
Invoice Date:	**12/13/2024**
Balance Due:	**$1,348.00**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4891842 | Job Date: 12/10/2021 | Delivery: Expedited

Location: Los Angeles, CA
Billing Atty: Karen Stilber
Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw, LLP

Witness: Jeanette Algarme	**Amount**
Video Services	$1,260.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,348.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,348.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7937657
Invoice Date: 12/13/2024
Balance Due: $1,348.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936636**
Invoice Date:	**12/11/2024**
Balance Due:	**$1,313.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4983505 | Job Date: 12/13/2021 | Delivery: Normal

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: Bernie Jestrabek-Hart	**Amount**
Video Services	$1,225.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,313.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,313.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936636
Invoice Date: 12/11/2024
Balance Due: $1,313.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936639**
Invoice Date:	**12/12/2024**
Balance Due:	**$1,663.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4996631 | Job Date: 12/17/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: Stacia Stiner	**Amount**
Video Services	$1,575.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,663.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,663.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936639
Invoice Date: 12/12/2024
Balance Due: $1,663.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936638**
Invoice Date:	**12/12/2024**
Balance Due:	**$1,348.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4992966 | Job Date: 12/17/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: David J. Rowland Esq | Seyfarth Shaw, LLP

Witness: Jeanette Algarme , Vol 2	**Amount**
Video Services	$1,260.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,348.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,348.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936638
Invoice Date: 12/12/2024
Balance Due: $1,348.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936642**
Invoice Date:	**12/12/2024**
Balance Due:	**$2,293.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 6894381 | Job Date: 9/12/2024 | Delivery: Expedited

Location: Fort Lauderdale, FL

Billing Atty: Karen Stilber

Scheduling Atty: Erica Rutner | Moore & Lee

Witness: Douglas J. Cross	**Amount**
Video Services	$2,205.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$2,293.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$2,293.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936642
Invoice Date: 12/12/2024
Balance Due: $2,293.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7937658**
Invoice Date:	**12/12/2024**
Balance Due:	**$718.00**

Case: Stiner, Et Al v. Brookdale Senior Living Inc Et Al (4:17cv3962)	**Proceeding Type: Depositions**

Job #: 4893631 | Job Date: 11/30/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Jennifer A. Riley Esq | Seyfarth Shaw, LLP

Witness: Douglas Cross , Vol II	**Amount**
Video Services	$630.00
Video - Electronic Access	$88.00

Notes: 1457-01

Invoice Total:	**$718.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$718.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7937658
Invoice Date: 12/12/2024
Balance Due: $718.00

Veritext Corporate Services LLC
Tel. 973-410-4098 Email: Billing-Corp@veritext.com
Fed. Tax ID: 20-3457913

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #:	**7936634**
Invoice Date:	**12/12/2024**
Balance Due:	**$1,033.00**

Case: Stiner, et al v. Brookdale Senior Living Inc et al (4:17cv3962) — **Proceeding Type: Depositions**

Job #: 4891787 | Job Date: 12/10/2021 | Delivery: Expedited

Location: Los Angeles, CA

Billing Atty: Karen Stilber

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: Stacia Stiner	**Amount**
Video Services	$945.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$1,033.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$1,033.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3457913

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7936634
Invoice Date: 12/12/2024
Balance Due: $1,033.00

Veritext, LLC - Midwest Region
Tel. 312.442.9087 Email: billing-midwest@veritext.com
Fed. Tax ID: 20-3132569

VERITEXT LEGAL SOLUTIONS

Bill To: Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

Invoice #: 7957404
Invoice Date: 12/19/2024
Balance Due: $588.00

Case: Stiner, Stacia, Et Al. v. Brookdale Senior Living, Inc., Et Al. (4:17cv03962HSG) — **Proceeding Type: Depositions**

Job #: 6641966 | Job Date: 4/12/2024 | Delivery: Normal

Location: Emeryville, CA

Billing Atty: Karen Stilber

Scheduling Atty: Michael D. Jacobsen | Seyfarth Shaw, LLP

Witness: Rita Stiner	Amount
Video Services	$500.00
Video - Electronic Access	$88.00

Notes:

Invoice Total:	**$588.00**
Payment:	**$0.00**
Credit:	**$0.00**
Interest:	**$0.00**
Balance Due:	**$588.00**

TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information

Remit to:
Veritext
P.O. Box 71303
Chicago IL 60694-1303
Fed. Tax ID: 20-3132569

Pay By ACH (Include invoice numbers):
A/C Name: Veritext
Bank Name:BMO Harris Bank
Account No:4353454 **ABA:**071000288
Swift: HATRUS44

Pay by Credit Card: www.veritext.com

Invoice #: 7957404
Invoice Date: 12/19/2024
Balance Due: $588.00

103356

U.S. Legal Support

INVOICE

Invoice No.	Invoice Date	Payment Terms
20250883771-11	1/17/2025	Net 30

Job No.	Job Date	Balance
4196272	3/18/2021	$1,780.90

Case Name

Stacia Stiner v. Brookdale Senior Living, Inc.

Case No.

17CV03962HSGLB

W - SAN FRANCISCO
16825 Northchase Drive Suite 900
Houston TX 77060
Phone: 415-777-2111 Fax: 415-362-4495

Guy Wallace
Schneider Wallace Cottrell Brayton Konecky, L.L.P.
180 Montgomery Street # # 2000
San Francisco CA 94104

Job Location	Ordered By	Reference Info.
U.S. Legal Support providing link - RemoteDepo	Guy Wallace Schneider Wallace Cottrell Brayton Konecky, L.L.P. 180 Montgomery Street # # 2000 San Francisco CA 94104	Client Matter No: Claim No: Insured: D/O/L: Adjuster:

Services/Items	Units	Type	Rate	Charges
1 CERTIFIED COPY OF TRANSCRIPT OF: Kimia Ataein				
Copy	362.00	Pages	$4.45	$1,610.90
Condensed Transcript	1.00	N/A	$35.00	$35.00
Litigation Technology, Support and Security Management	1.00	N/A	$60.00	$60.00
Transcript Handling & Processing	1.00	N/A	$75.00	$75.00

Total Due	**$1,780.90**
AFTER 3/3/2025 PAY	$2,048.04
(-) Payments/Credits	**$0.00**
(+) Finance Charges/Late Fees	**$0.00**
(=) New Balance	**$1,780.90**

Tax ID : 76-0523238 Nevada Firm Registration # 067F

Phone: 415-421-7100

Invoice not paid by due date is subject to interest of 1.5% per month. We will make reasonable efforts to allocate payments properly. U.S. Legal Support may recover any fees and costs it incurs in collecting any unpaid amounts. Any rights regarding allocations, refunds or adjustments after 90 days from payment shall be waived by payer.
Review our Terms & Conditions for additional information at our website www.uslegalsupport.com.

"Please detach bottom portion and return with payment."

Guy Wallace
Schneider Wallace Cottrell Brayton Konecky, L.L.P.
180 Montgomery Street # # 2000
San Francisco CA 94104

Invoice No.	20250883771-11	**Invoice Date**	1/17/2025
Job No.	4196272	**Case No.**	17CV03962HSGLB
Total Due	**$1,780.90**		

Remit To: **U.S. Legal Support, Inc.**
P.O. Box 4772
Houston, TX 77210

PAY BY CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date: **Phone:**

Billing Address:

Zip: **Card Security Code:**

Amount to Charge:

Cardholder's Signature:

ESQUIRE DEPOSITION SOLUTIONS

Invoice INV2947170

1500 Centre Pkwy
Suite 100
East Point GA 30344
888-486-4044
www.esquiresolutions.com
Tax ID # 45-3463120

Date 11/8/2024
Terms Net 30
Due Date 12/8/2024

Client Number C543613
Esquire Office San Francisco
Proceeding Type Deposition
Name of Insured
Adjuster
Firm Matter/File #
Client VAL ID
Date of Loss

Bill To
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street
6th Floor
San Francisco CA 94105

Services Provided For
Rosen Bien Galvan & Grunfeld LLP - San Francisco
Bien-Kahn, Benjamin J
101 Mission Street
6th Floor
San Francisco CA 94105

Job Date	Job ID	Job Location	Case
4/22/2024	J11084458	Ft. Lauderdale, FLORIDA	STACIA STINER V. BROOKDALE SENIOR LIVING

Description	Deponent	Qty	Unit Rate	Tax	Amount
DIGITAL MEDIA	Michael Anthony Johnson 30b6	7	95.00		$665.00
HANDLING FEE	Michael Anthony Johnson 30b6	1	25.00		$25.00

Subtotal	690.00
Shipping Cost (n/a)	0.00
Total	$690.00
Amount Due	690.00

Attorney is responsible for payment of all charges incurred. Payment is due by "Due Date" shown on invoice. Failure to pay by "Due Date" may result in the assessment of a late fee. Transcript package typically includes transcript/word index, exhibits, appearance fee, condensed transcript, litigation support disk, shipping, video charges and may include other service charges based on job or region. Some services and rates may vary by job or region. Please contact your local office for specific detail and questions. Full Terms and Conditions are viewable online at www.esquiresolutions.com/terms-conditions. These stated terms and conditions, to the extent they contradict the rules and regulations in Arizona, do not apply. All aspects of this invoice and other business terms comply with the ethical obligations set forth in the AZ Code of Judicial Administration Section 7-206(J)(1)(g)(3) through (6).

Please detach and return this bottom portion with your payment or
pay online or obtain W9 at www.esquireconnect.com or to pay just this invoice with CC/ACH: Pay Nowb&OLHQW1DPH5RVHQ%LHQ*DC

Your Receipt

Last Updated Thu, Dec 30, 2021
Invoice # 1X97XU8AST

Invoice

Space Rental	
Subtotal	$857.50
8+ hour discount (15%)	-$128.63
Space rental total	**$728.87**

Price	
Space rental total	$728.87
Subtotal	$728.87
Processing	$69.24
Invoice Total	**$798.11**

Activity Details

Host
John H.

Space
Conference Room with Videoconferencing - Space for 10 (Off-Site)

Date & Time
Mon, Jan 10, 2022
9:00 am - 5:00 pm PST
Tue, Jan 11, 2022
9:00 am - 6:30 pm PST

Attendees
2 people

Paid

Updated	Status	Method	Amount
Dec 30, 2021	Paid	amex - 3061, Exp. 4/2026	$798.11

peerspace 548 Market St #96966, San Francisco, CA 94104

Your Receipt

Last Updated Tue, Jan 11, 2022
Invoice # 1X97XU8AST

Download Receipt

Invoice

Space rental

Subtotal	$857.50
8+ hour discount (15%)	-$128.63
Space rental total	**$728.87**

Price

Space rental total	$728.87
Overtime	$122.50
Subtotal	$851.37
Processing ?	$80.88
Invoice Total	**$932.25**

Paid

Updated		Amount
Dec 30, 2021	amex - 3061, Exp. 4/2026	$798.11
Jan 11, 2022	amex - 3061, Exp. 4/2026	$134.14

peerspace

548 Market St #96966, San Francisco, CA 94104

Done

Activity Details

Host

John H.

Space

Conference Room with Videoconferencing - Space for 10 (Off-Site)

Date & Time

Mon, Jan 10, 2022
9:00 am - 5:00 pm PST
Tue, Jan 11, 2022
9:00 am - 6:30 pm PST

Attendees

2 people

From: coLAB <work@colabconnect.com>
Sent: Wednesday, January 5, 2022 6:15 PM
To: Karen Stilber
Subject: Your Booking is Complete
Attachments: calendar.ics

[EXTERNAL] Notice: This message comes from an external sender.

Hi Karen Stilber,

You have requested to book Genius Lab on Jan 24, 2022 from 9:00am to 5:00pm.

We're happy to say that your booking has been approved. If you need to cancel your meeting before it starts

Cancellations: Bookings cancelled 48 hours in advance will receive a full refund or credit to your account. B
subject to a 10% fee [deducted from your refund].

Parking: We have temporary parking passes for our private lot for $3/day or you can park in the public lot ju
you arrive.

Location & Access: We are located on the first floor in the Press Democrat Building. You can enter through
see our door straight ahead. Our door **remains locked** throughout the day, but staff will be here from 8am-4

While You're Here: We hope you enjoy the space! We will provide a WiFi card when you first arrive so that
as you'd like and if you'd like to bring your own meals for the day, you will have full access to our kitchenette

User Guide & COVID-19 Safety Protocols. Click HERE for more information about the space and to read o

And as always, let us know if you have any other questions. Happy working!

You are receiving this email because you are a member of coLAB.
coLAB is part of the Proximity Network of Coworking Spaces, which means you are

427 Mendocino Avenue, , USA, Santa Rosa, CA 95401

From: coLAB <work@colabconnect.com>
Sent: Wednesday, January 5, 2022 6:28 PM
To: Karen Stilber
Subject: Your Booking is Complete
Attachments: calendar.ics

[EXTERNAL] Notice: This message comes from an external sender.

Hi Karen Stilber,

You have requested to book Genius Lab on Jan 25, 2022 from 8:00am to 6:30pm.

We're happy to say that your booking has been approved. If you need to cancel your meeting before it starts

Cancellations: Bookings cancelled 48 hours in advance will receive a full refund or credit to your account. B
subject to a 10% fee [deducted from your refund].

Parking: We have temporary parking passes for our private lot for $3/day or you can park in the public lot ju
you arrive.

Location & Access: We are located on the first floor in the Press Democrat Building. You can enter through
see our door straight ahead. Our door **remains locked** throughout the day, but staff will be here from 8am-4

While You're Here: We hope you enjoy the space! We will provide a WiFi card when you first arrive so that
as you'd like and if you'd like to bring your own meals for the day, you will have full access to our kitchenette

User Guide & COVID-19 Safety Protocols. Click HERE for more information about the space and to read o

And as always, let us know if you have any other questions. Happy working!

You are receiving this email because you are a member of coLAB.
coLAB is part of the Proximity Network of Coworking Spaces, which means you are

427 Mendocino Avenue, , USA, Santa Rosa, CA 95401

INVOICE #00012136

Satellite Felton
6265 Highway 9
Felton, CA, 95018
PHONE: 831.222.2100

BILL TO:
Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA, 94105

DATE:
Jul 18, 2022
DUE DATE:
Jul 18, 2022

Date	Item	Description	Rate	Qty	Amount
Reservations & Passes					
Dec 10, 2021	Conference Room, Large, full day	Depo prep	$150.00	1	$150.00
Dec 13, 2021	Conference Room, Large, full day	Deposition	$150.00	1	$150.00
Jan 13, 2022	Conference Room, Large, full day	Depo prep	$150.00	1	$150.00
Jan 14, 2022	Conference Room, Large, full day	Deposition	$150.00	1	$150.00
				Subtotal:	**$600.00**
				Balance:	**$600.00**

From: mail@mydeskworks.com
Sent: Thursday, February 29, 2024 7:28 PM
To: Karen Stilber
Subject: Karen Stilber Customer Receipt/Purchase Confirmation

SATELLITE WORKPLACE

digital media studio ctv

02/29/24

Dear Karen Stilber,

Thank you for your order!

Invoice Number: 86643, Customer ID: 8193, Transaction ID: 41974

Billing Information

Karen Stilber
Rosen Bien Galvan & Grunfeld LLP

, CA
US
kstilber@rbgg.com

Order ID: 086643

Date Added	Item	Description	Price	Qty	Amount
Reservations and Passes					

02/29/24	Conference Room, Large, per day	Mar 20, 2024	$225.00	1.0	$225.00
			Total Reservations and Passes		**$225.00**
Total Charges					**$225.00**
Payments					
02/29/24	Payment	Credit card Payment on 02/29/24 with card ending in XXXX-XXXX-XXXX-3061			-$225.00
Balance					**$0.00**

Satellite Santa Cruz,
325 Soquel Avenue,
Santa Cruz, California,
95062

(831) 531-2300 mail@mydeskworks.com
http://thesatellitecenters.com/

From: kathi@satelliteworkplaces.com
Sent: Wednesday, November 1, 2023 10:06 AM
To: Karen Stilber
Subject: Karen Stilber Customer Receipt/Purchase Confirmation

SATELLITE WORKPLACES

11/01/23

Dear Karen Stilber,

Thank you for your order at Satellite Felton!

Invoice Number: 318246, Customer ID: 18454, Transaction ID: 195279

Billing Information

Karen Stilber
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105
US
kstilber@rbgg.com

Order ID: 318246

Date Added	Item	Description	Price	Qty	Amount
Recurring Items					
11/01/23	Access Plan		$109.00	1.0	$109.00

11/01/23	Monthly Access Sweep	Invoice for monthly services used alongside the Access Plan	$0.00	1.0	$0.00
				Total Recurring Items	**$109.00**
Misc. Charges					
11/01/23	Payment Fee	Payment processing fee	$3.04	1.0	$3.04
				Total Misc. Charges	**$3.04**
Total Charges					**$112.04**
Payments					
11/01/23	Payment	Credit card Payment on 11/01/23 with card ending in XXXX-XXXX-XXXX-3061			-$112.04
Balance					**$0.00**

Satellite Felton,
6265 Highway 9,
Felton, California,
95018

(831) 222-2100 kathi@satelliteworkplaces.com
http://thesatellitecenters.com/

From: mail@mydeskworks.com
Sent: Thursday, February 29, 2024 7:28 PM
To: Karen Stilber
Subject: Karen Stilber Customer Receipt/Purchase Confirmation

SATELLITE WORKPLACE

digital media studio ctv

02/29/24

Dear Karen Stilber,

Thank you for your order!

Invoice Number: 86643, Customer ID: 8193, Transaction ID: 41974

Billing Information

Karen Stilber
Rosen Bien Galvan & Grunfeld LLP

, CA
US
kstilber@rbgg.com

Order ID: 086643

Date Added	Item	Description	Price	Qty	Amount
Reservations and Passes					

02/29/24	Conference Room, Large, per day	Mar 20, 2024	$225.00	1.0	$225.00
			Total Reservations and Passes		**$225.00**
Total Charges					**$225.00**
Payments					
02/29/24	Payment	Credit card Payment on 02/29/24 with card ending in XXXX-XXXX-XXXX-3061			-$225.00
Balance					**$0.00**

Satellite Santa Cruz,
325 Soquel Avenue,
Santa Cruz, California,
95062

(831) 531-2300 mail@mydeskworks.com
http://thesatellitecenters.com/

From: Karen Stilber <KStilber@rbgg.com>
Sent: Tuesday, March 26, 2024 8:46 PM
To: Accounting
Subject: FW: Karen Stilber Customer Receipt/Purchase Confirmation

This charge may be reversed if depo does not go forward. Bill to 1457-1.

From: mail@mydeskworks.com <mail@mydeskworks.com>
Sent: Tuesday, March 26, 2024 5:43 PM
To: Karen Stilber <KStilber@rbgg.com>
Subject: Karen Stilber Customer Receipt/Purchase Confirmation

SATELLITE WORKPLACE
digital media studio ctv

03/26/24

Dear Karen Stilber,

Thank you for your order!

Invoice Number: 86757, Customer ID: 8193, Transaction ID: 42202

Billing Information

Karen Stilber
Rosen Bien Galvan & Grunfeld LLP

, CA
US
kstilber@rbgg.com

Order ID: 086757

Date Added	Item	Description	Price	Qty	Amount
Reservations and Passes					
03/26/24	Conference Room, Large, per 1/2 day	Apr 16, 2024	$150.00	1.0	$150.00
			Total Reservations and Passes		**$150.00**
Total Charges					**$150.00**
Payments					
03/26/24	Payment	Credit card Payment on 03/26/24 with card ending in XXXX-XXXX-XXXX-3061			-$150.00
Balance					**$0.00**

Satellite Santa Cruz,
325 Soquel Avenue,
Santa Cruz, California,
95062

(831) 531-2300 mail@mydeskworks.com
http://thesatellitecenters.com/

STATEMENT OF ACCOUNT

Account name:	Rosen Bien Galvan & Grunfeld LLP	Account number:	13313417
Attn:	Ms. Karen Stilber	Invoice number:	4119-35673
	101 Mission Street, 6th Floor San Francisco, California 94105 United States of America	Statement date:	05 April 2024
		Due date :	**05 April 2024**

USEFUL INFORMATION

- You can update your details and check the current status of your account by logging into **www.MyRegus.com**
- If you have questions about your invoices or payments, please speak to your Community Team.
- Alternatively, you can log a case through your online account (Help section).

Center name: CA, San Bernardino - Three Parkside

Account balance		Payments	Amount
Outstanding balance on 26 March 2024			$ 306.00
Payment received -	29 March 2024	-$ 306.00	
April 2024 invoice 4119-35673			$ 325.00

Total payment due **$ 325.00**

Center Address: 473 E. Carnegie Drive □ Suite 200 □ San Bernardino □ CA 92408 □ USA

INVOICE

Account name: **Rosen Bien Galvan & Grunfeld LLP**

Attn: Ms. Karen Stilber

101 Mission Street, 6th Floor
San Francisco, California 94105
United States of America

Account number: 13313417
Invoice number: 4119-35673
Invoice date: 05 April 2024
Due date : **05 April 2024**
Host; Amy Xu

Your TAX Number:

Center name: CA, San Bernardino - Three Parkside

Description of Charges	Month	Price	TAX	Total
Meeting Room	April 2024	$ 325.00	$ 0.00	$ 325.00

Total (excl. TAX)	$ 325.00
TAX	$ 0.00
April invoice total (inc. Tax)	**$ 325.00**

See next page for an itemized breakdown of charges

YOUR INVOICE DETAILS

[redacted]

Account name:	**Rosen Bien Galvan & Grunfeld LLP**	Account number:	13313417
		Invoice number:	4119-35673
Attn:	Ms. Karen Stilber	Invoice date:	05 April 2024
		Due date:	**05 April 2024**

Center name: CA, San Bernardino - Three Parkside

ONE-OFF CHARGES INCURRED

Item Description	From Date	To Date	Price	TAX	Total (inc. TAX)
Meeting Room Charge	4 Apr 2024	4 Apr 2024	$ 325.00	$ 0.00	$ 325.00
Booked by: Ms. Karen Stilber	Booking: 144382919	P/O: Host; Amy Xu			
		Subtotal	$ 325.00	$ 0.00	$ 325.00
		Total Charges	**$ 325.00**	**$ 0.00**	**$ 325.00**

METHODS OF PAYMENT

Your current method of payment is: Amex
Card number ending 3061, expiry date 04/26

You can update your payment method to Direct Debit or Credit Card via www.MyRegus.com

You may pay by Check:

Pay Online at:	https://www.e-billexpress.com/ebpp/IWGPLC/

IMPORTANT INFORMATION: Please provide your Invoice Number as a payee reference on all payments and that you allow for a minimum of 3 days posting time prior to your due date.

You may pay by Bank Transfer to:

Bank Name:	Wells Fargo
Bank Address:	420 Montgomery Street San Francisco, California 94104 United States of America
Account Name:	Regus Management Group, LLC
Account Number:	4023919251
BIC/Swift Code:	WFBIUS6S
Routing #:	121000248

IMPORTANT INFORMATION:
Please provide your Invoice Number <4119-35673> as a payee reference on all payments made.

UNDERSTANDING YOUR INVOICE

INVOICE EXPLANATIONS

Account adjustments/refunds	Any adjustments/refunds that were made to your account.
Account balance	The account balance shows recent activity on your account in summary format. It shows the balance at the end of the previous summary date and any payments or adjustments that have been received since the last statement. The account statement can be found on www.MyRegus.com. The current invoice value is then added to produce the Total Payment Due figure.
Credits	Credits that were issued against a particular charge for which you have been invoiced for in a previous period.
Due date	The latest date on which the invoice needs to be paid. Please note that any outstanding balances shown in the account summary will be due for immediate payment.
Invoice	The invoice shows a summary of all charges (recurring and one-off) related to the invoice period.
Late payment fees	We incur extra costs if you pay late. A fee will therefore be levied against your account if the payment is late.
One-off charges incurred	Variable and/or one-off charges related to a specific invoicing period.
Payments received	All payments received since your last invoice was raised.
Recurring charges	These are fixed monthly charges, invoiced in advance.
Total payment due	The total payment due is the total current balance of monies owed on your account and includes any amounts that are overdue.

ONE-OFF CHARGES	
Meeting Room	Use of a Meeting Room including any telephone calls, prepayments and cancellation charges

From: Karen Stilber <KStilber@rbgg.com>
Sent: Monday, April 8, 2024 8:52 PM
To: Accounting
Cc: Ben Bien-Kahn
Subject: Receipt - bill to 1457-1

From: mail@mydeskworks.com <mail@mydeskworks.com>
Sent: Monday, April 8, 2024 4:33 PM
To: Karen Stilber <KStilber@rbgg.com>
Subject: Karen Stilber Customer Receipt/Purchase Confirmation

SATELLITE WORKPLACE

digital media studio ctv

04/08/24

Dear Karen Stilber,

Thank you for your order!

Invoice Number: 87615, Customer ID: 8193, Transaction ID: 42510

Billing Information

Karen Stilber
Rosen Bien Galvan & Grunfeld LLP

, CA
US
kstilber@rbgg.com

Order ID: 087615

Date Added	Item	Description	Price	Qty	Amount
Reservations and Passes					
04/08/24	Conference Room, Large, per 1/2 day	Apr 25, 2024	$150.00	1.25	$187.50
			Total Reservations and Passes		**$187.50**
Total Charges					**$187.50**
Payments					
04/08/24	Payment	Credit card Payment on 04/08/24 with card ending in XXXX-XXXX-XXXX-3061			-$187.50
Balance					**$0.00**

Satellite Santa Cruz,
325 Soquel Avenue,
Santa Cruz, California,
95062

(831) 531-2300 mail@mydeskworks.com
http://thesatellitecenters.com/

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/01/22	2050270	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV003962-HSG STIINER V. BROOKDALE SUBPOENA TO TESTIFY 4/11/22 @ 9:00AM	Ref No.: 1457-1 RENEE BUCKNER 1031 NORTH EUCLID AVENUE ONTARIO	BASE : FUEL CHRG :	149.50 11.21	160.71
PDF PROCESS PRIORITY							
4/01/22	2050276	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV003962-HSG STIINER V. BROOKDALE SUBPOENA TO TESTIFY 4/11/22 @ 1:00PM	Ref No.: 1457-1 BENNIE WILLIAMS 1031 NORTH EUCLID AVENUE ONTARIO *RELATED TO 2050270 *PERSONALLY SERVED* ADV=WITNESS FEES MISC=3 COPIES @.205	BASE : ADVANCE : CHK.CHARGE: MISC. :	40.00 40.00 4.00 .75	84.75
PDF PROCESS PRIORITY							
4/01/22	2050279	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV003962-HSG STIINER V. BROOKDALE SUBPOENA TO TESTIFY 4/12/22 @ 9:00AM	Ref No.: 1457-1 GLORIA ZIMMER 1031 NORTH EUCLID AVENUE ONTARIO **RELATED TO 2050276 ADV=WITNESS FEES MISC=3 COPIES @0.25	BASE : ADVANCE : CHK.CHARGE: MISC. :	40.00 40.00 4.00 .75	84.75
PDF PROCESS PRIORITY							
4/01/22	2050284	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV003962-HSG STIINER V. BROOKDALE SUBPOENA TO TESTIFY 4/12/22 @ 100PM	Ref No.: 1457-1 BARBARA STEED 22585 VAM LEAUVEM STREET LOMA LINDA *PERSONALLY SERVED* ADV=WITNESS FEES MISC=3 COPIES @0.25	BASE : ADVANCE : CHK.CHARGE: MISC. : FUEL CHRG :	136.75 40.00 4.00 .75 10.26	191.76
PDF PROCESS PRIORITY							

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	2

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/05/22	2050970	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO	Ref No.: 1457-1 LAURENCE HALL AT BROOKDALE PUALIN 2375 RANGE AVENUE #415 SANTA ROSA	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	218.50 50.00 5.00 16.39	289.89
PDF PROCESS PRIORITY			4:17-CV-03962-HSG STIINER V. BROOKDALE SUBPOENA TO TESTIFY 4/15/22 @ 1:00PM	ADV. FEES. *PERSONALLY SERVED*			
4/13/22	2053861	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO	Ref No.: 1457-1 MICHAEL KAPPOS/BROOKEDALE SENIOR 10200 CHAPMAN AVE. #155 GARDEN GROVE	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	174.25 50.00 5.00 13.07	242.32
PDF PROCESS PRIORITY			4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/22 ADV. $50.00 DOLLARS	ADV=WITNESS FEES *PERSONALLY SERVED*			
4/14/22	2054212	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO	Ref No.: 1457-1 DOMENICA NARDI/BROOKEDALE SAN RAMON 18888 BOLLINGER CANYON RD. SAN RAMON	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	157.75 50.00 5.00 11.83	224.58
PDF PROCESS PRIORITY			4:17-CV-03962 STINER V BROOKDALE SUBP TESTIFY 04/25 ADV. $50.00	*PERSONALLY SERVED*			
4/14/22	2054214	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO	Ref No.: 1457-1 NANCY RUTHERFORD/BROOKDALE REDWOOD 485 WOODSIDE ROAD REDWOOD CITY	BASE : MISC. :	125.00 1.00	126.00
PDF PROCESS PRIORITY			4:17-CV-03962 STINER V BROOKDALE SUBP TESTIFY 04/25 ADV. $50.00	**RELATED TO 2054402 MISC=4 COPIES @.25			

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	Total Due
4/22/22	5,447.89
Current	Over 30 Days
5,447.89	.00
Over 60 Days	Over 90 Days
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	3

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/14/22	2054216	PSD	Caller: KAREN STILBER	Ref No.: 1457-1	BASE :	151.25	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	PHYLLI NELSON/BROOKDALE MONROVIA	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	201 E. FOOTHILL BLVD.	CHK.CHARGE:	5.00	
			SAN FRANCISCO	MONROVIA	MISC. :	1.00	
			4:17-CV-03962		FUEL CHRG :	11.34	218.59
			STINER V BROOKDALE	MISC=4 COPIES @.25			
			SUBP TESTIFY 04/25				
			ADV. $50.00				
4/14/22	2054217	PSD	Caller: KAREN STILBER	Ref No.: 1457-1	BASE :	40.00	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	BETTY MACOMBER/BROOKDALE MONROVIA	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	201 E. FOOTHILL BLVD.	CHK.CHARGE:	5.00	
			SAN FRANCISCO	MONROVIA	MISC. :	1.00	96.00
			4:17-CV-03962	**RELATED TO 2054216			
			STINER V BROOKDALE				
			SUBP TESTIFY 04/25	MISC=4 COPIES @.25			
			ADV. $50.00				
4/14/22	2054219	PSD	Caller: KAREN STILBER	Ref No.: 1457-1	BASE :	187.75	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	ELEANOR OWEN/BROOKDALE IRVINE	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	10 MARQUET	CHK.CHARGE:	5.00	
			SAN FRANCISCO	IRVINE	MISC. :	1.00	
			4:17-CV-03962		FUEL CHRG :	14.08	257.83
			STINER V BROOKDALE	Personally served			
			SUBP TESTIFY 04/25	ADV=WITNESS FEES			
			ADV. $50.00	misc=4 copies @0.25			
4/14/22	2054220	PSD	Caller: KAREN STILBER	Ref No.: 1457-1	BASE :	158.50	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	IBTESAM JUMAIAH/BROOKEDALE ANAHEIM	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	200 N. DALE AVENUE	CHK.CHARGE:	5.00	
			SAN FRANCISCO	ANAHEIM	MISC. :	1.00	
			4:17-CV-03962	ADV=WITNESS FEES	FUEL CHRG :	11.89	226.39
			STINER V BROOKDALE	*PERSONALLY SERVED*			
			SUBP TESTIFY 04/25	MISC= 4 COPIES @.25			
			ADV. $50.00				

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	4

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/14/22	2054402	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962 STINER V BROOKDALE SUBP TESTIFY 04/25 ADV. $50.00	Ref No.: 1457-1 BLANCA PATTISON 485 WOODSIDE ROAD REDWOOD CITY ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE:	215.50 50.00 5.00	270.50
PDF PROCESS	PRIORITY						
			Total Charges for Ref. - 1457-1: 2,474.07				
4/05/22	2051249	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/18 ADV. $40.00 DOLLARS	Ref No.: IWOV-DMS.FID50920 CATHERINE FRISINGER/BROOKDALE UPT 13250 E. PHILADELPHIA ST. #347 WHITTIER BROOKDALE UPTOWN *RELATED TO 2051251	BASE :	40.00	40.00
PDF PROCESS	PRIORITY						
4/05/22	2051251	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/18 ADV. $40.00 DOLLARS	Ref No.: IWOV-DMS.FID50920 VERLENE THOMPSON/BROOKDALE WHITTIER 13250 E. PHILADELPHIA ST. UNKW WHITTIER BROOKDALE UPTOWN WHITTIER PERSONALLY SERVED 4/6/2022	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	147.75 50.00 5.00 11.08	213.83
PDF PROCESS	PRIORITY						
4/05/22	2051252	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/18 ADV. $50.00 DOLLARS	Ref No.: IWOV-DMS.FID50920 JOAN GREENWOOD/BROOKDALE MONROVIA 201 E. FOOTHILL BLVD. #232 MONROVIA MISC=3 COPIES @.25 ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: MISC. : FUEL CHRG :	151.25 50.00 5.00 .75 11.34	218.34
PDF PROCESS	PRIORITY						

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	Total Due
4/22/22	5,447.89
Current	Over 30 Days
5,447.89	.00
Over 60 Days	Over 90 Days
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	5

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/05/22	2051253	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	135.00	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	FRANCES KIM/BROOKDALE ALHAMBRA	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	1 E. COMMONWEALTH AVE. UNKNWN	CHK.CHARGE:	5.00	
			SAN FRANCISCO	ALHAMBRA	MISC. :	.75	
			4:17-CV-03962-HSG	ADV=WITNESS FEES	FUEL CHRG :	10.13	200.88
			STINER V BROOKDALE				
			FED TESTIFY 04/18	*PERSONALLY SERVED*			
			ADV. $50.00 DOLLARS	MISC=3 COPIES @.25			
4/05/22	2051254	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	154.50	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	BEATRICE GOLDBERG/BROOKDALE TARZANA	MISC. :	.75	
PDF PROCESS	PRIORITY		101 MISSION STREET	18700 BURBANK BLVD. #727A	FUEL CHRG :	11.59	166.84
			SAN FRANCISCO	TARZANA			
			4:17-CV-03962-HSG				
			STINER V BROOKDALE				
			FED TESTIFY 04/18	MISC=3 COPIES @.25			
			ADV. $50.00 DOLLARS				
4/05/22	2051256	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	177.25	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	DULCIE GAYTAN/BROOKDALE OCEANSIDE	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	3524 LAKE BLVD. #123B	CHK.CHARGE:	5.00	
			SAN FRANCISCO	OCEANSIDE	MISC. :	.75	
			4:17-CV-03962-HSG	ADV=WITNESS FEES	FUEL CHRG :	13.29	246.29
			STINER V BROOKDALE	*PERSONALLY SERVED*			
			FED TESTIFY 04/18				
			ADV. $50.00 DOLLARS	MISC=3 COPIES @.25			
4/05/22	2051257	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	186.25	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	VICTORIAL ALVY/BROOKDALE IRVINE	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	10 MARQUETTE/ UNIT UNKNOWNED	CHK.CHARGE:	5.00	
			SAN FRANCISCO	IRVINE	MISC. :	.75	
			4:17-CV-03962-HSG	ADV=WITNESS FEES	FUEL CHRG :	13.97	255.97
			STINER V BROOKDALE	*PERSONALLY SERVED*			
			FED TESTIFY 04/18				
			ADV. $50.00 DOLLARS	MISC=3 COPIES @.25			

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	6

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/05/22	2051258	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	40.00	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	SHARON BLOOMER/BROOKDALE IRVINE	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	10 MARQUETTE/UNIT UNKNOWN	CHK.CHARGE:	5.00	
			SAN FRANCISCO	IRVINE	MISC. :	.75	95.75
			4:17-CV-03962-HSG	*RELATED TO 2051257			
			STINER V BROOKDALE	MISC=3 COPIES @.25			
			FED TESTIFY 04/18				
			ADV. $50.00 DOLLARS	*PERSONALLY SERVED*			
4/05/22	2051259	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	40.00	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	CARL MARIZ/BROOKDALE IRVINE	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	10 MARQUETTE #124	CHK.CHARGE:	5.00	
			SAN FRANCISCO	IRVINE	MISC. :	.75	95.75
			4:17-CV-03962-HSG	*RELATED TO 2051257			
			STINER V BROOKDALE	*PERSONALLY SERVED*			
			FED TESTIFY 04/18	ADV=WITNESS FEES			
			ADV. $50.00 DOLLARS	MISC=3 COPIES @.25			
4/05/22	2051260	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	162.25	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	ESTELLE LILIENTHAL/BROOKDALE GARDEN	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	10200 CHAPMAN AVE. #155	CHK.CHARGE:	5.00	
			SAN FRANCISCO	GARDEN GROVE	MISC. :	.75	
			4:17-CV-03962-HSG	ADV=WITNESS FEES	FUEL CHRG :	12.17	230.17
			STINER V BROOKDALE	misc=3 copies .25			
			FED TESTIFY 04/18				
			ADV. $50.00 DOLLARS	PERSONALLY SERVED			
4/06/22	2051445	PSD	Caller: BEN=BIEN KAHN	Ref No.: IWOV-DMS.FID50920	BASE :	153.75	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	Aurora Deaux	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	13250 E. PHILADELPHIA ST.	CHK.CHARGE:	5.00	
			SAN FRANCISCO	WHITTIER	FUEL CHRG :	11.53	220.28
			4:17-CV-03962-HSG	ADV=WITNESS FEES			
			STINER V BROOKDALE				
			SUBPOENA TO TESTIFY	PERSONALLY SERVED			
			APRIL 19				

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	Total Due
4/22/22	5,447.89
Current	Over 30 Days
5,447.89	.00
Over 60 Days	Over 90 Days
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	7

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/06/22	2051532	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE SUBPOENA TO TESTIFY APRIL 19	Ref No.: IWOV-DMS.FID50920 Arlene Crawford 780 Harrington Way FOLSOM ADV=WITNESS FEES PERSONALLY SERVED 4/06/2022	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	153.25 50.00 5.00 11.49	219.74
PDF PROCESS PRIORITY							
4/07/22	2052178	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE SUBPOENA TO TESTIFY APRIL 19	Ref No.: IWOV-DMS.FID50920 LORNA PALMER 780 Harrington Way FOLSOM CONTINUED ATTEMPT 4/08/2022	BASE : FUEL CHRG :	153.25 11.49	164.74
PDF PROCESS PRIORITY							
4/08/22	2052710	INV	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/18 ADV. $50.00 DOLLARS	Ref No.: IWOV-DMS.FID50920 BEATRICE GOLDBERG/BROOKDALE TARZANA 18700 BURBANK BLVD. #727A TARZANA	BASE :	92.50	92.50
INVESTIGATIONS							
4/11/22	2052858	PSD	Caller: BEN=BIEN KAHN ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-CV-03962-HSG STINER V BROOKDALE FED TESTIFY 04/22 ADV. $50.00 DOLLARS	Ref No.: IWOV-DMS.FID50920 DAVID MACKEEN/BROOKDALE GARDEN GROV 10200 CHAPMAN AVE. #155 GARDEN GROVE SEE ATTACHED CLIENT EMAIL	BASE : FUEL CHRG :	162.25 12.17	174.42
PDF PROCESS PRIORITY							
			Total Charges for Ref. - IWOV-DMS.FID50920: 2,635.50				

Continued

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	8

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/15/22	2054992	PSD	Caller: KAREN STILBER	Ref No.: STINER V. BROOKDALE SEN	BASE :	174.25	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	Carolyn Lorenger	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	485 Woodside Road	CHK.CHARGE:	5.00	
			SAN FRANCISCO	REDWOOD CITY	FUEL CHRG :	13.07	242.32
			4:17-cv-03962-HSG				
			STINER V. BROOKDALE	PERSONALLY SERVED			
			SUBPOENA TEST	ADV=WITNESS FEES			
			4/28/2022				
4/15/22	2054993	PSD	Caller: KAREN STILBER	Ref No.: STINER V. BROOKDALE SEN	BASE :	40.00	
			ROSEN, BIEN, GALVAN & GRUNFELD LLP	Malcolm Fraser	ADVANCE :	50.00	
PDF PROCESS	PRIORITY		101 MISSION STREET	485 Woodside Road	CHK.CHARGE:	5.00	
			SAN FRANCISCO	REDWOOD CITY	MISC. :	1.00	96.00
			4:17-cv-03962-HSG	*RELATED TO 2054992			
			STINER V. BROOKDALE	*PERSONALLY SERVED*			
			SUBPOENA TEST				
			4/28/2022	MISC=4 COPIES @.25			
			Total Charges for Ref. - STINER V. BROOKDALE SEN: 338.32				
						Total	5,447.89

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
448164	13574
Invc Date	**Total Due**
4/22/22	5,447.89
Current	**Over 30 Days**
5,447.89	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	448164	4/15/22	5,447.89	9

Date	Ordr No.	Svc	Service Detail	Charges	Total

Reference	Description	Orders	Total Amt
1457-1		13	2,474.07
IWOV-DMS.FID50920		15	2,635.50
STINER V. BROOKDALE SEN		2	338.32
	Reference Totals :	30	5,447.89
	Total Amount Due :	30	5,447.89

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

Account # 13574

Statement Date 5/16/22

BILLING INQUIRIES PLEASE CALL (213) 623-3979

Date	Typ	Reference	Amount	Credit	Balance
4/22/22	Inv	448164	5,447.89		
4/27/22	Csh	VOIDED-CK		50.00-	
5/16/22	Csh	STOPPED-CK		630.00-	4,767.89
5/06/22	Inv	451763	1,898.57		1,898.57

6,666.46

CURRENT	30 - 60 DAYS	60 - 90 DAYS	90 - 120 DAYS	OVER 120 DAYS
6,666.46	0.00	0.00	0.00	0.00

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.
586177
Invc Date
3/07/24
Current
1,550.42

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Invoice No.	Period Ending	Pg
586177	2/29/24	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
2/29/24	2292336	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPNA TESTIFY 3/19 ADV $50	Ref No.: 1457-1 John Beaty 100 Lockewood Lane SCOTTS VALLEY ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	232.75 50.00 5.00 17.46	305.21
PDF PROCESS	PRIORITY						
2/29/24	2292337	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPNA TESTIFY 3/19 ADV $50	Ref No.: 1457-1 Diana Kaufeldt 100 Lockewood Lane SCOTTS VALLEY RELATED TO 2292336 MISC=4 COPIES ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: MISC. :	43.00 50.00 5.00 1.00	99.00
PDF PROCESS	PRIORITY						
2/29/24	2292338	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPNA TESTIFY 3/19 ADV $50	Ref No.: 1457-1 Ann Wahl 100 Lockewood Lane SCOTTS VALLEY RELATED TO 2292337 MISC=4 COPIES	BASE : MISC. :	43.00 1.00	44.00
PDF PROCESS	PRIORITY						

Total Charges for Ref. - 1457-1: 448.21

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.
586177
Invc Date
3/07/24
Current
1,550.42

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Invoice No.	Period Ending	Pg
586177	2/29/24	2

Date	Ordr No.	Svc	Service Detail			Charges	Total
2/29/24	2292298	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V. BROOKDALE Letter; Subpoena	Ref No.: STINER V. BROOKDALE Luana Williams 18888 Bollinger Canyon Rd SAN RAMON *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	169.75 50.00 5.00 12.73	237.48
PDF PROCESS	PRIORITY						
2/29/24	2292309	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V. BROOKDALE Letter; Subpoena	Ref No.: STINER V. BROOKDALE Joe Williams 18888 Bollinger Canyon Rd SAN RAMON RELATED TO 2292298 ADVANCE FEES MISC=4 COPIES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: MISC. :	43.00 50.00 5.00 1.00	99.00
PDF PROCESS	PRIORITY						
2/29/24	2292313	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V. BROOKDALE Letter; Subpoena	Ref No.: STINER V. BROOKDALE Ronald Paulo 18888 Bollinger Canyon Rd SAN RAMON MISC=4 COPIES RELATED TO 2292298	BASE : MISC. :	43.00 1.00	44.00
PDF PROCESS	PRIORITY						

Total Charges for Ref. - STINER V. BROOKDALE: 380.48

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.
589346
Invc Date
3/21/24
Current
1,788.68
Over 60 Days
.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Invoice No.	Period Ending	Pg
589346	3/15/24	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
3/01/24	2292529	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V BROOKDALE LTR;SUBPOENA;$50.00 3.21.24 900AM	Ref No.: 1457-1 Kenneth Joyce 15302 Brookhurst St. WESTMINSTER *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	144.25 50.00 5.00 10.82	210.07
PDF PROCESS	PRIORITY						
3/01/24	2292533	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V BROOKDALE LTR;SUBPOENA;$50.00 3.21.24 100PM	Ref No.: 1457-1 Kelli Zahner [redacted] IRVINE MISC=4 COPIES *ASSOC WITH 2293405 NEW ADDRESS*	BASE : MISC. : FUEL CHRG :	146.00 1.00 10.95	157.95
PDF PROCESS	PRIORITY						
3/04/24	2293405	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V BROOKDALE LTR;SUBPOENA;$50.00 3.21.24 100PM	Ref No.: 1457-1 Kelli Zahner [redacted] REDLANDS ADVANCE FEES	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	165.50 50.00 5.00 12.41	232.91
PDF PROCESS	PRIORITY						

Total Charges for Ref. - 1457-1: 600.93

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
592960	13574
Invc Date	**Total Due**
4/08/24	680.79
Current	**Over 30 Days**
680.79	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	592960	3/31/24	680.79	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
3/22/24	2300902	P3D	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKEDALE SUBPNA TO TEST 4/23	Ref No.: 1457-1 Beena Kumar [redacted] SAN JOSE ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE:	165.75 55.00 5.50	
PDF PROCESS	3 DAY						226.25
3/22/24	2300903	P3D	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKEDALE SUBPNA TO TEST 4/23	Ref No.: 1457-1 Akindele Omole [redacted] HAYWARD *ASSOC WITH 2303946 NEW ADDRESS*	BASE : FUEL CHRG :	97.25 7.29	
PDF PROCESS	3 DAY						104.54
3/28/24	2302803	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962-HSG STINER V BROOKEDALE SUBPNA TO TESTIFY ADV $50	Ref No.: 1457-1 Ann Wahl 100 Lockewood Lane SCOTTS VALLEY ADVANCE FEES *PERSONALLY SERVED* *****RURAL AREA*****	BASE : ADVANCE : CHK.CHARGE:	295.00 50.00 5.00	
PDF PROCESS	PRIORITY						350.00
			Total Charges for Ref. - 1457-1: 680.79				
					Total		680.79

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE, INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
592960	13574
Invc Date	**Total Due**
4/08/24	680.79
Current	**Over 30 Days**
680.79	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	592960	3/31/24	680.79	2

Date	Ordr No.	Svc	Service Detail	Charges	Total

Reference	Description	Orders	Total Amt
1457-1		3	680.79
	Reference Totals :	3	680.79
	Total Amount Due :	3	680.79

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE, INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.
603501
Invc Date
5/23/24
Current
463.50
Over 60 Days
.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Invoice No.	Period Ending	Pg
603501	5/15/24	1

Date	Ordr No.	Svc	Service Detail		Charges	Total
4/09/24	2306828	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO	Ref No.: 1457-1 Carolyn Appeal [redacted] LATHROP	BASE : 231.75 XA-ATTEMPT: 231.75	463.50
PDF PROCESS	PRIORITY		4:17-cv-03962 Stiner v Brookdale SUBPOENA TO TESTIFY APRIL 30	XA=6 ATTEMPTS TOTAL		
			Total Charges for Ref. - 1457-1: 463.50			
					Total	463.50

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE, INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.
595654
Invc Date
4/22/24
Current
588.17
Over 60 Days
.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Invoice No.	Period Ending	Pg
595654	4/15/24	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
4/01/24	2303946	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKEDALE SUBPNA TO TEST 4/23	Ref No.: 1457-1 Akindele Omole [redacted] ANTIOCH ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE: FUEL CHRG :	186.25 50.00 5.00 13.97	
PDF PROCESS	PRIORITY						255.22
4/09/24	2306816	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPNA TESTIFY 4/25 ADV $92 WITNESS FEE	Ref No.: 1457-1 Catherine Squires [redacted] HOLLISTER ADV=WITNESS FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE:	231.75 92.00 9.20	
PDF PROCESS	PRIORITY						332.95
			Total Charges for Ref. - 1457-1: 588.17				
					Total		588.17

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
595654	13574
Invc Date	**Total Due**
4/22/24	588.17
Current	**Over 30 Days**
588.17	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	595654	4/15/24	588.17	2

Date	Ordr No.	Svc	Service Detail	Charges	Total

Reference	Description	Orders	Total Amt
1457-1		2	588.17
	Reference Totals :	2	588.17
	Total Amount Due :	2	588.17

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
615487	13574
Invc Date	**Total Due**
7/19/24	534.27
Current	**Over 30 Days**
534.27	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	615487	7/15/24	534.27	1

Date	Ordr No.	Svc	Service Detail			Charges	Total
7/12/24	2340915	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPOENA TO TESTIFY 7/24 @ 10A	Ref No.: 1457-1 Akindele Omole [redacted] ANTIOCH ASSOC WITH 2341340 NEW ADDRESS*	BASE : FUEL CHRG :	186.25 13.97	200.22
PDF PROCESS	PRIORITY						
7/15/24	2341340	PSD	Caller: KAREN STILBER ROSEN, BIEN, GALVAN & GRUNFELD LLP 101 MISSION STREET SAN FRANCISCO 4:17-cv-03962 HSG (L STINER V BROOKDALE SUBPOENA TO TESTIFY 7/24 @ 10A	Ref No.: 1457-1 Akindele Omole [redacted] TRACY ADVANCE FEES *PERSONALLY SERVED*	BASE : ADVANCE : CHK.CHARGE:	231.75 93.00 9.30	334.05
PDF PROCESS	PRIORITY						
			Total Charges for Ref. - 1457-1: 534.27				
					Total		534.27

INVOICE PAYMENT DUE UPON RECEIPT

ACE ATTORNEY SERVICE
Delivering Peace of Mind

INVOICE

ACE ATTORNEY SERVICE,INC.
P.O.BOX 71036
LOS ANGELES, CA 90071
TAX ID # 95-4557668

Invoice No.	Customer No.
615487	13574
Invc Date	**Total Due**
7/19/24	534.27
Current	**Over 30 Days**
534.27	.00
Over 60 Days	**Over 90 Days**
.00	.00

ROSEN, BIEN, GALVAN & GRUNFELD LLP
ATTN: KIRA HANSEN
101 MISSION STREET, SIXTH FL.
SAN FRANCISCO, CA 94105

BILLING INQUIRIES CALL
(213) 623-3979

Customer No.	Invoice No.	Period Ending	Amount Due	Pg
13574	615487	7/15/24	534.27	2

Date	Ordr No.	Svc	Service Detail	Charges	Total

Reference	Description	Orders	Total Amt
1457-1		2	534.27
	Reference Totals :	2	534.27
	Total Amount Due :	2	534.27

INVOICE PAYMENT DUE UPON RECEIPT

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	March 31, 2021	SU350702-02-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: Stacia Stiner, et al.
Defendant: Brookdale Senior Living, Inc., et al.

Client File No.: Stiner v. Brookdale
Pertaining To: Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)

Records From: 4Front Technologies c/o Ross J. Schwartz (Agent for Service)
701 "B" Street, Suite 1400
San Diego, CA, 92101

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service Attempted (Bad Address)			25.00

Comments:

Closed out order per your/client's request.

SUB-TOTAL	60.00
SALES TAX	.00
TOTAL DUE	$ 60.00

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU350702-02/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN
Legal Services
P.O. Box 867 • Torrance, CA 90508

LOS ANGELES CA 900
2 APR 2021 PM 8 L
RECEIVED

APR 05 2021

Rosen Bien Galvan & Grunfeld

94105-173850

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	March 31, 2021	SU350702-06-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: **Stacia Stiner, et al.**
Defendant: **Brookdale Senior Living, Inc., et al.**

Client File No.: **Stiner v. Brookdale**
Pertaining To: **Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)**

Records From: **Fairchild Communications Services, Inc. c/o CT Corporation System**
818 W. 7th Street, Suite 930
Los Angeles, CA, 90017

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service of Subpoena			25.00
Custodian Witness Fee Advanced			15.00
Fee Advancement Charge	15.00	0.10	1.50

RECEIVED
APR 09 2021
Rosen Bien Galvan & Grunfeld

Comments:

Closed out order per your/client's request.

SUB-TOTAL	76.50
SALES TAX	.00
TOTAL DUE	$ 76.50

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU350702-06/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	April 22, 2021	SU350702-03-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: **Stacia Stiner, et al.**
Defendant: **Brookdale Senior Living, Inc., et al.**

Client File No.: **Stiner v. Brookdale**
Pertaining To: **Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)**

Records From: **Stanley Healthcare Center Operating Company, LLC**
c/o Goings & Goings, Inc.
25271 Barton Road
Loma Linda, CA, 92354

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service of Subpoena			25.00
Custodian Witness Fee Advanced			15.00
Fee Advancement Charge	15.00	0.10	1.50
Certificate of No Records Obtained			5.00
RECEIVED APR 26 2021 Rosen Bien G.			
Comments:		SUB-TOTAL	81.50
		SALES TAX	3.40
		TOTAL DUE	$ 84.90

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

Order#:SU350702-03/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	April 30, 2021	SU350702-04-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: Stacia Stiner, et al.
Defendant: Brookdale Senior Living, Inc., et al.

Client File No.: Stiner v. Brookdale
Pertaining To: Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)

Records From: RF Technologies, Inc. dba RF Technologies Code Alert c/o CT Corporation System
818 W. 7th Street, Suite 930
Los Angeles, CA, 90017

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service of Subpoena			25.00
Custodian Witness Fee Advanced			15.00
Fee Advancement Charge	15.00	0.10	1.50

Comments:

Closed out order per your/client's request.

SUB-TOTAL	76.50
SALES TAX	.00
TOTAL DUE	$ 76.50

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU350702-04/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN
Legal Services
P.O. Box 867 • Torrance, CA 90508

LOS ANGELES CA 900
RECEIVED 6 MAY 2021 PM 11

U.S. POSTAGE PITNEY BOWES
ZIP 90504 $ 000.51⁰
02 4W
0000360944 MAY 05 2021

MAY 10 2021

Rosen Bien Galvan & Grunfeld

9410E-173850

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	May 28, 2021	SU350702-01-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: **Stacia Stiner, et al.**
Defendant: **Brookdale Senior Living, Inc., et al.**

Client File No.: **Stiner v. Brookdale**
Pertaining To: **Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)**

Records From: **Lifeline Systems Company c/o CSC Lawyers, Inc.**
2710 Gateway Oaks Drive, Suite 150N
Sacramento, CA, 95833

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service of Subpoena			25.00
Custodian Witness Fee Advanced			15.00
Fee Advancement Charge	15.00	0.10	1.50
Out of Area Service Charge - Sacramento, CA			30.00

Comments:

Closed out order per your/client's request.

SUB-TOTAL	106.50
SALES TAX	.00
TOTAL DUE	$ 106.50

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU350702-01/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	May 28, 2021	SU352023-01-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: Stacia Stiner, et al.
Defendant: Brookdale Senior Living, Inc., et al.

Client File No.: Stiner v. Brookdale
Pertaining To: Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)

Records From: 4Front Technologies c/o Shawn Tofte (Agent for Service of Process)
4456 Tuttle Pointe Drive
Dublin, OH, 43016

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Subpoena Preparation Charge			12.00
Service Attempted - Dublin, OH (Bad Address)			135.00

Comments:

Closed out order per your/client's request.

SUB-TOTAL	182.00
SALES TAX	.00
TOTAL DUE	$ 182.00

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU352023-01/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

TITAN Legal Services

ACCOUNT NO:	INVOICE DATE:	INVOICE NO:
BIEN04	May 28, 2021	SU350702-05-01

Bill To:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Ordered By:
Amy Xu, Esq.
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Fl.
San Francisco, CA 94105

Claim No:
Insured:
Date of Loss:
Plaintiff: **Stacia Stiner, et al.**
Defendant: **Brookdale Senior Living, Inc., et al.**

Client File No.: **Stiner v. Brookdale**
Pertaining To: **Brookdale Senior Living, Inc. (refer to the Attachment for full list of items)**
Records From: **Silversphere, LLC c/o Incorp Services, Inc.**
5716 Corsa Avenue, Suite 110
Westlake Village, CA, 91362

DESCRIPTION OF SERVICES RENDERED	QUANTITY	UNIT PRICE	AMOUNT
Basic Charge			35.00
Service of Subpoena			25.00
Custodian Witness Fee Advanced			15.00
Fee Advancement Charge	15.00	0.10	1.50

Comments:

Closed out order per your/client's request.

SUB-TOTAL	76.50
SALES TAX	.00
TOTAL DUE	$ 76.50

Thank you for choosing Titan Legal Services, Inc.!
For inquiries, please contact us at (310) 464-8655.

TERMS: NET 15 DAYS

MAKE CHECKS PAYABLE TO:
Titan Legal Services, Inc.
P.O. BOX 867
Torrance, CA 90508
FEDERAL TAX ID 26-1600646

PLEASE PAY FROM THIS INVOICE

We recognize that some of our customers may be billing these expenses through their clients. In any case, the Titan Legal Services, Inc. customer remains responsible to pay within our terms regardless of their receivables.

Order#:SU350702-05/WHITINV

PLEASE INCLUDE OUR INVOICE NUMBER WITH YOUR REMITTANCE

Jim Pemberton

From: Karen Stilber
Sent: Tuesday, April 3, 2018 12:31 PM
To: Jim Pemberton
Subject: Check request

Please have a check issued in the amount of $7.50 made payable to Pamela A. Batalo, CSR, Inc.

Address if you need it: 450 Golden Gate Avenue, Room 16-6798, San Francisco, CA 94102.

This is for a copy of transcript for a March 15 hearing in the district court in matter 1457-1. No huge rush, but I will want to send it to the court myself as she will send the transcript after she receives check.

Thanks!

Karen Stilber
Paralegal
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, CA 94105
(415) 433-6830 (telephone)
(415) 433-7104 (fax)
kstilber@rbgg.com

CONFIDENTIALITY NOTICE
The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at rbg@rbg-law.com.
IRS CIRCULAR 230 NOTICE: As required by United States Treasury Regulations, you should be aware that this communication is not intended by the sender to be used, and it cannot be used, for the purpose of avoiding penalties under United States federal tax laws.

Richele K Pate

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, January 22, 2019 7:10 PM
To: Accounting
Cc: Karen Stilber
Subject: FW: Transcript request - 7/12/18 - C-17-3962 HSG

Follow Up Flag: Follow up
Flag Status: Flagged

Please prepare a check for $127.50 to Diane Skillman – bill it to 1457-1 transcript fee

Gay Crosthwait Grunfeld
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Diane_Skillman@cand.uscourts.gov <Diane_Skillman@cand.uscourts.gov>
Sent: Tuesday, January 22, 2019 3:41 PM
To: Karen Stilber <KStilber@rbgg.com>; Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: Transcript request - 7/12/18 - C-17-3962 HSG

Good afternoon,
I am in receipt of your request. Please send a deposit check payable to Diane Skillman, 1301 Clay Street, Ste. 400-S, Oakland, CA 94612 in the amount of $127.50. Upon receipt, within 14 days I will email the transcript to Ms. Grunfeld.

Thank you,
Diane Skillman, CSR,
Official Court Reporter, USDC
925-899-2812

ECHO REPORTING, INC.

9711 CACTUS STREET, SUITE B
LAKESIDE, CA 92040
(858)453-7590

Invoice

Tax ID # 33-0570796

Date	Invoice #
5/5/22	33698

Bill To

ROSEN, BIEN, GALVAN & GRUNFELD, LLP
101 MISSION STREET, 6TH FLOOR
SAN FRANCISCO, CA 94105
ATTN: JENNY YELIN, ESQ.
(415) 433-6830

echoreporting@yahoo.com

Date Ordered	Criminal/Civil	Terms	Date Delivered
CIVIL		UPON RECEIPT	5/2/22

Quantity	Description	Rate	Amount
	STINER VS. BROODALE SENIOR LIVING Case No. C 17-03962 Held in San Francisco, California Before the Honorable Laurel Beeler		
12	3/31/22 Transcript of Proceedings	0.90	10.80
19	4/21/22 " "	0.90	17.10
	COPY AS PER ORDER		

CERTIFICATION ~ I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

/s/ Tara Jauregui

Additional Information ~ Full price may be charged only if the transcript is delivered within the required time frame. For Example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be for 14-day delivery rate.

Total $27.90

ST44 Rev. 04/18
Derived from AO44 Rev. 04/18

UNITED STATES DISTRICT COURT
For the Northern California

INVOICE 20220124

Gay Crosthwait Grunfeld
Rosen, Bien, Galvan & Grunfeld, LLP
101 Mission St. 6th Floor
San Francisco, CA 94105
(415) 433-6830 Fax: (415) 433-7104
www.rbgg.com

MAKE CHECKS PAYABLE TO:

Raynee H. Mercado, CSR RMR CRR FCRR CCRR
Certified Shorthand Reporter
1502 Carlton Way
Brentwood, CA 94513-5912
(510) 565-7228 Fax: (510) 328-3334
cacsr8258@gmail.com

__ CRIMINAL	✕ CIVIL	DATE ORDERED: 07-11-2022	DATE DELIVERED: 07-22-2022

In the matter of: C17-03962HSG, Stiner, et al. v Brookdale Ssenior Living, Inc., et al.

7/8/22 motions hearing tx - pgs 1-59, 59 pgs copy 14-day expedite, pdf by email

CATEGORY	ORIGINAL			1ST COPY			2ND COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
Ordinary		3.65			0.90			0.60		
14-Day		4.25		59	0.90	53.10		0.60		53.10
Expedited		4.85			0.90			0.60		
3-Day		5.45			1.05			0.75		
Daily		6.05			1.20			0.90		
Hourly		7.25			1.20			0.90		
Realtime		3.05								
Misc.									Misc. Charges	
									Subtotal	53.10
									Less Discount for Late Delivery	
									Tax (If Applicable)	
									Less Amount of Deposit	
									Total Refund	
									Total Due	53.10

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE:	DATE:
Raynee H. Mercado	

DISTRIBUTION: TO PARTY (2 copies - 1 to be returned with payment) COURT REPORTER COURT REPORTER SUPERVISOR

AD HOC REPORTING

2220 Otay Lakes Road
Suite 502-85
Chula Vista, CA 91915

(619) 236-9325

AdHocReporting
@aol.com

INVOICE

DATE: November 22, 2022 INVOICE NO.: 22-26006

TO: AMY XU
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

CASE NO: 17-cv-03962-HSG

CASE NAME: Stiner, et al. v. Brookdale Senior Living, et al.

DATE(S) OF PROCEEDINGS: 11/17/2022 - Judge Beeler
(Transcript of Discovery Hearing)

* *

	Pages	Cost/Page	Total Due
14-Day Delivery of PDF Copy:			
11/17/2022	21	0.90	18.90
Total Due			**$ 18.90**

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

Peggy Schuerger
Ad Hoc Reporting
Approved Transcription Provider
for the U.S. District Court,
Northern District of California

OUR TAX ID NUMBER IS: 33-0778397

Subject: C17-03962HSG Docket #637 Transcript Order Form
To: <kstilber@rtgg.com>

Good morning. I've received your order. Please send a deposit of $136.25 to me, Raynee H. Mercado, CSR, 1502 Carlton Way, Brentwood, CA 94513-5912. Please let me know when it is sent, by what method, and if a tracking number is available, please provide that to me.

Three days after receipt of the deposit, the transcript will be emailed to Ms. Grunfeld unless otherwise directed.

Thank you.

--
Raynee H. Mercado, CSR
Official Certified Shorthand Reporter
USDC - Oakland

ST44 Rev. 10/23
Derived from AO44 Rev. 10/23

UNITED STATES DISTRICT COURT
Northern District of California

INVOICE 20240205

MAKE CHECKS PAYABLE TO:

Jenny S. Yelin
Rosen Bien Galvan & Grunfeld, LLP
101 Mission Street
6th Floor
San Francisco, CA 94105
(415) 433-6830
jyelin@rbgg.com

MK Litigation Solutions, Inc.
3315 North 17th Avenue
Phoenix, AZ 85015
(602) 391-6990
marla_knox@cand.uscourts.gov
Tax ID: 82-4851936

__ CRIMINAL ✕ CIVIL

DATE ORDERED: 09-19-2024

DATE DELIVERED: 10-05-2024

In the matter of: CV-17-03962, Eidler (Stiner) et al v Brookdale Senior Living, et al

Proceedings heard before the Honorable Haywood S. Gilliam on 9/19/2024.

CATEGORY	ORIGINAL			1ST COPY			ADDITIONAL COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
30-Day		4.40			1.10			0.75		
14-Day	19	4.70	89.30		1.10			0.75		89.30
7-Day		5.85			1.10			0.75		
3-Day		6.55			1.30			0.90		
Next-Day		7.30			1.45			1.10		
2-Hour		8.70			1.45			1.10		
Realtime		3.70			2.55			1.80		
Misc.									Misc. Charges	
									Subtotal	89.30
									Less Discount for Late Delivery	
									Tax (If Applicable)	
Date: 09-24-2024		**Check:** 52805							Less Amount of Deposit	84.60
									Total Refund	
									Total Due	4.70

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE: Marla F. Knox, CRR, RMR

DATE: 10-08-2024

DISTRIBUTION: TO PARTY (2 copies - 1 to be returned with payment) COURT REPORTER COURT REPORTER SUPERVISOR

ST44 Rev. 10/23
Derived from AO44 Rev. 10/23

UNITED STATES DISTRICT COURT
Northern District of California

INVOICE 20240204

Gay Crosthwait Grunfeld
Rosen, Bien, Galvan & Grunfeld, LLP
101 Mission St. 6th Floor
San Francisco, CA 94105
(415) 433-6830 Fax: (415) 433-7104
ggrunfeld@rbgg.com

MAKE CHECKS PAYABLE TO:

Raynee H. Mercado, CSR RMR CRR FCRR CCRR
Certified Shorthand Reporter
1502 Carlton Way
Brentwood, CA 94513-5912
(510) 565-7228 Fax: (510) 328-3334
cacsr8258@gmail.com

__ CRIMINAL ✕ CIVIL

DATE ORDERED: 12-17-2024

DATE DELIVERED: 12-17-2024

In the matter of: C17-03962HSG, Stiner, et al. v Brookdale Senior Living, et al.

12/17/24 PTC hearing tx pgs 1 - 35, 35 pgs 1/2 O+2 split with defense - pdf by email ggrunfeld@rbgg.com

CATEGORY	ORIGINAL			1ST COPY			ADDITIONAL COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
30-Day		4.40			1.10			0.75		
14-Day		5.10			1.10			0.75		
7-Day		5.85			1.10			0.75		
3-Day		6.55			1.30			0.90		
Next-Day	17	7.30	124.10	17	1.45	24.65		1.10		148.75
2-Hour		8.70			1.45			1.10		
Realtime		3.70			2.55			1.80		
Misc.									Misc. Charges	
									Subtotal	148.75
									Less Discount for Late Delivery	
									Tax (If Applicable)	
									Less Amount of Deposit	
									Total Refund	
									Total Due	148.75

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE: Raynee H. Mercado /s/

DATE: 12-17-2024

DISTRIBUTION: TO PARTY (2 copies - 1 to be returned with payment) COURT REPORTER COURT REPORTER SUPERVISOR

ST44 Rev. 10/23
Derived from AO44 Rev. 10/23

UNITED STATES DISTRICT COURT
Northern District of California

INVOICE 20250011

Gay Crosthwait Grunfeld
Rosen, Bien, Galvan & Grunfeld, LLP
101 Mission St. 6th Floor
San Francisco, CA 94105
(415) 433-6830 Fax: (415) 433-7104
ggrunfeld@rbgg.com

MAKE CHECKS PAYABLE TO:

Raynee H. Mercado, CSR RMR CRR FCRR CCRR
Certified Shorthand Reporter
1502 Carlton Way
Brentwood, CA 94513-5912
(510) 565-7228 Fax: (510) 328-3334
cacsr8258@gmail.com

__ CRIMINAL ✕ CIVIL

DATE ORDERED: 01-15-2025

DATE DELIVERED: 01-15-2025

In the matter of: C17-03962HSG, Stiner, et al. v Brookdale Senior Living, et al.

1/14/25 PTC hearing tx pgs 1 - 45, 45 pgs pdf by email ggrunfeld@rbgg.com, kstilber@rbgg.com

CATEGORY	ORIGINAL			1ST COPY			ADDITIONAL COPY			TOTAL CHARGES
	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	PAGES	PRICE	SUBTOTAL	
30-Day		4.40			1.10			0.75		
14-Day		5.10			1.10			0.75		
7-Day		5.85			1.10			0.75		
3-Day		6.55			1.30			0.90		
Next-Day		7.30			1.45			1.10		
2-Hour		8.70		45	1.45	65.25	45	1.10	49.50	114.75
Realtime		3.70			2.55			1.80		
Misc.									Misc. Charges	
									Subtotal	114.75
									Less Discount for Late Delivery	
									Tax (If Applicable)	
									Less Amount of Deposit	
									Total Refund	
									Total Due	114.75

ADDITIONAL INFORMATION

Full price may be charged only if the transcript is delivered within the required time frame. For example, if an order for expedited transcript is not completed and delivered within (7) calendar days, payment would be at the 14-day delivery rate, and if not completed and delivered within 14 days, payment would be at the ordinary delivery rate.

CERTIFICATION

I certify that the transcript fees charged and page format used comply with the requirements of this court and the Judicial Conference of the United States.

SIGNATURE: Raynee H. Mercado /s/

DATE: 01-15-2025

DISTRIBUTION: TO PARTY (2 copies - 1 to be returned with payment) COURT REPORTER COURT REPORTER SUPERVISOR

Cary Scott, P.I.
CARY'S ATTORNEY SERVICE & INVEST.
P.O. Box 967
Sun City, CA, 92586-0967
TAX I.D. 47-3670254

Invoice submitted to:
Ben Bien-Kahn, Esq.
ROSEN BIEN GALVAN & GRUNFELD, LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105

June 27, 2021

In Reference To: Stiner vs. Brookdale Senior Living, Inc., et al.
File No. 1457-01

Invoice #7714

Professional Services

		Rate	Amount
	6/2/2021		
6/2/2021	Research to further I.D. and attempt to ascertain current contact information for [redacted].	85.00/hr	85.00
	SUBTOTAL:	[	85.00]
	6/3/2021		
6/3/2021	Research to further I.D. and attempt to ascertain current contact information for [redacted] and [redacted].	85.00/hr	340.00
	SUBTOTAL:	[	340.00]
	6/8/2021		
6/8/2021	Research to further I.D. and attempt to ascertain current contact information for [redacted].	85.00/hr	127.50
	SUBTOTAL:	[	127.50]
	6/14/2021		
6/14/2021	Research to further I.D. and attempt to ascertain current contact information for [redacted], and [redacted].	85.00/hr	170.00

		Rate	Amount
	SUBTOTAL:	[	170.00]
	6/21/2021		
6/21/2021	Research to further I.D. and to ascertain current contact information for [redacted].	85.00/hr	127.50
	SUBTOTAL:	[	127.50]
	For professional services rendered	10.00	$850.00
	Additional Charges :		
	6/2/2021		
6/2/2021	LexisNexis Preliminary Search		10.00
	LexisNexis Accurint Report		33.00
	SUBTOTAL:	[	43.00]
	6/3/2021		
6/3/2021	LexisNexis Preliminary Searches (2)		20.00
	LexisNexis Accurint Reports (2)		66.00
	SUBTOTAL:	[	86.00]
	6/8/2021		
6/8/2021	LexisNexis Preliminary Search		10.00
	LexisNexis Accurint Report		33.00
	O.C. Courts Index		1.00
	SUBTOTAL:	[	44.00]
	6/14/2021		
6/14/2021	LexisNexis Preliminary Searches (2)		20.00
	LexisNexis Accurint Reports (2)		66.00

		Amount
	SUBTOTAL:	[86.00]
	6/21/2021	
6/21/2021	LexisNexis Preliminary Search	10.00
	LexisNexis Accurint Reports (3)	99.00
	SUBTOTAL:	[109.00]
	Total additional charges	$368.00
	Total amount of this bill	$1,218.00
	Balance due	$1,218.00

360 IQ Inc.
548 Market #80004
San Francisco, CA 94104
(800) 649-6280
accounting@360iqinc.com

Invoice

BILL TO
Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2768	07/02/2021	$4,706.25	08/01/2021	Net 30	

DATE	DESCRIPTION	QTY	RATE	AMOUNT
06/04/2021	Reviewed notes & script. Locate research Tier A. Begin calls.	3.25	175.00	568.75
06/05/2021	Tcs to Tier A. Witness interviews & write-ups.	3	175.00	525.00
06/06/2021	Tcs and write-ups continued.	2.75	175.00	481.25
06/11/2021	Add'l research re: LinkedIn and databases TierA and B. Tcs and Interviews. Wrote memo.	1.50	175.00	262.50
06/12/2021	Interviews and attempt calls.	2	175.00	350.00
06/13/2021	Interviews and attempt calls.	1.75	175.00	306.25
06/14/2021	Memo writing and tcs cont.	2.50	175.00	437.50
06/19/2021	Add'l linkedin database research new names. Tcs and Interviews.	3.50	175.00	612.50
06/20/2021	Interviews and attempt calls.	1.50	175.00	262.50
06/21/2021	Interviews and attempt calls.	1.25	175.00	218.75
06/23/2021	report writing and tcs.	2.50	175.00	437.50
06/25/2021	2 attorney contact only locates for client.	0.25	175.00	43.75
06/30/2021	EXPENSES: Databases			200.00

Wire or ACH Transfer Information:
Account Name: 360 IQ Inc.
Bank: Chase Bank
Routing #: [redacted]
Account #: [redacted]

BALANCE DUE **$4,706.25**

360 IQ Inc.
548 Market #80004
San Francisco, CA 94104 US
(800)649-6280
accounting@360iqinc.com

Invoice

BILL TO
Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2931	02/25/2022	$5,075.00	03/27/2022	Net 30	

DATE	DESCRIPTION	QTY	RATE	AMOUNT
02/15/2022	Brookdale locate research, tcs, interview & write-ups Jan 7 to Feb 15	26	150.00	3,900.00
02/25/2022	Brookdale locate research, tcs, interview & write-ups Feb 15 to to Feb 25	7	150.00	1,050.00
02/25/2022	Locate Database Expenses			125.00

Wire or ACH Transfer Information:
Account Name: 360 IQ Inc.
Bank: Chase Bank
Routing #: [redacted]
Account #: [redacted]

BALANCE DUE **$5,075.00**

360 IQ Inc.
548 Market #80004
San Francisco, CA 94104 US
(800)649-6280
accounting@360iqinc.com

Invoice

BILL TO
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

INVOICE #	DATE	TOTAL DUE	DUE DATE	TERMS	ENCLOSED
2985	05/10/2022	$1,800.00	06/09/2022	Net 30	

DATE	DESCRIPTION	QTY	RATE	AMOUNT
04/15/2022	Interviews re: Brookdale interviews including ME locate research (Heavily discounted hourly rate to $150)	11.50	150.00	1,725.00
04/15/2022	EXPENSES: Database expenses			75.00

Wire or ACH Transfer Information:
Account Name: 360 IQ Inc.
Bank: Chase Bank
Routing #: [redacted]
Account # [redacted]

BALANCE DUE **$1,800.00**

Compton Wood, Inc
P O Box 2443
Berkeley, CA 94702 US
+1 5103990225
admin@comptonwood.com

INVOICE

BILL TO
Adrienne Spiegel
Rosen Bien Galvan and Grunfeld

INVOICE	1206
DATE	08/01/2024
TERMS	Net 30
DUE DATE	08/31/2024

SUB CUSTOMER
Stiner v. Brookdale

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
07/01/2024	Investigative services 250	Research re[redacted]locate	1:30	250.00	375.00
07/02/2024	Investigative services 250	DMV check; email to counsel	0:12	250.00	50.00

We also accept payment by Zelle at either scott@comptonwood.com, allison@comptonwood.com or (510) 599 5317.

BALANCE DUE **$425.00**

Tax ID. 88-4100966

Compton Wood, Inc
P O Box 2443
Berkeley, CA 94702 US
+1 5103990225
admin@comptonwood.com

INVOICE

BILL TO
Gay Grunfeld
Rosen Bien Galvan & Grunfeld

INVOICE	1308
DATE	01/28/2025
TERMS	Net 30
DUE DATE	02/27/2025

SUB CUSTOMER
Stiner v Brookdale Senior L

DATE	ACTIVITY	DESCRIPTION	QTY	RATE	AMOUNT
01/09/2025	Investigative services 250	Witness locates	1:00	250.00	250.00
01/09/2025	Database	Commercial database access - witness locates	4	25.00	100.00
01/10/2025	Investigative services 250	Research re: locates - cont.; email to counsel	1:00	250.00	250.00

We also accept payment by Zelle at either scott@comptonwood.com, allison@comptonwood.com or (510) 599 5317.

BALANCE DUE **$600.00**

Tax ID. 88-4100966

Pay invoice

PR Newswire
a CISION company

PLEASE REMIT TO:
PR NEWSWIRE ASSOCIATION LLC
G.P.O Box 5897, NEW YORK, NY 10087-5897

INVOICE

For Billing, Payment Inquiries and Wire Transfer Instructions call: **888-776-0942** or **201-360-6060**

Kristen Vanzetti
ROSEN BIEN GALVAN & GRUNFELD LLP / WHITAKER COMMUN
315 MONTGOMERY STREET/SAN FRANCISCO, CA 94104

INVOICE NUMBER	102927483
DATE	14-Jul-2017
ACCOUNT NUMBER	983891
AMOUNT DUE	$ 1,537.16

TERMS - DUE 30 DAYS FROM DATE OF THIS INVOICE

FOR CORRESPONDENCE ONLY:
ATTN: ACCOUNTS RECEIVABLE
PR NEWSWIRE ASSOCIATION LLC
602 PLAZA THREE
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311-3801

PR Newswire

ACCOUNT NAME	ACCOUNT NO.	LOG NO.	DATE	INVOICE NUMBER
	983891	SF42476	14-Jul-2017	102927483

SERVICE DESCRIPTION	PRICE
VISIBILITY REPORTS EMAIL	$ 0.00
VISIBILITY REPORTS EMAIL ADDITIONAL LENGTH CHARGE	$ 0.00
US1 NEWSLINE - SOCIAL	$ 0.00
US1 NEWSLINE - SOCIAL - ADDITIONAL LENGTH	$ 490.00
COMPLIMENTARY PRESS RELEASE OPTIMIZATION	$ 0.00
SOCIALPOST (TM) NEWS DISTRIBUTION SERVICE	$ 99.00
US1 NATIONAL NEWSLINE	$ 804.14
MICROLIST - SENIOR CITIZEN INTEREST	$ 650.00
DISCOUNT :	-$ 505.98

HEADLINE : Rosen Bien Galvan & Grunfeld: Elderly Residents File Ground-Breaking Class Action Lawsuit Against NYSE-Traded Brookdale Senior Living Over Financial Abuse and Widespread Violations of the ADA
BILLING COMMENTS : Sender's Name:Carl Whitaker
Sender's Telephone:1-510-847-0599

You can remit payment, view invoices, and print copies of press releases online through your PR Newswire Online Member Center account at https://portal.prnewswire.com/
STORY DATE : 07/14/2017

Services provided by PR Newswire are governed by and shall at all times be subject to PR Newswire's General Terms and Conditions and the supplemental terms and conditions applicable to the Services located at **http://www.prnewswire.com/customer-terms-conditions-landing-page.html.**

PLEASE PAY THIS AMOUNT	▶	$ 1,537.16

We Accept Visa, Mastercard, American Express and Discover Card
For Billing and Payment Inquiries call:
888-776-0942 or **201-360-6060**

PR Newswire
a CISION company

PLEASE REMIT TO:
PR NEWSWIRE ASSOCIATION LLC
G.P.O Box 5897, NEW YORK, NY 10087-5897

INVOICE

For Billing, Payment Inquiries and Wire Transfer Instructions call: **888-776-0942** or **201-360-6060**

Kristen Vanzetti
ROSEN BIEN GALVAN & GRUNFELD LLP / WHITAKER COMMUN
315 MONTGOMERY STREET/SAN FRANCISCO, CA 94104

INVOICE NUMBER	102927483
DATE	14-Jul-2017
ACCOUNT NUMBER	983891
AMOUNT DUE	$ 1,537.16

TERMS - DUE 30 DAYS FROM DATE OF THIS INVOICE

FOR CORRESPONDENCE ONLY:
ATTN: ACCOUNTS RECEIVABLE
PR NEWSWIRE ASSOCIATION LLC
602 PLAZA THREE
HARBORSIDE FINANCIAL CENTER
JERSEY CITY, NJ 07311-3801

PR Newswire

ACCOUNT NAME	ACCOUNT NO.	LOG NO.	DATE	INVOICE NUMBER
	983891	SF42476	14-Jul-2017	102927483

SERVICE DESCRIPTION	PRICE

You can remit payment, view invoices, and print copies of press releases online through your PR Newswire Online Member Center account at https://portal.prnewswire.com/

STORY DATE : 07/14/2017

Services provided by PR Newswire are governed by and shall at all times be subject to PR Newswire's General Terms and Conditions and the supplemental terms and conditions applicable to the Services located at **http://www.prnewswire.com/customer-terms-conditions-landing-page.html.**

PLEASE PAY THIS AMOUNT	▶	$ 1,537.16

We Accept Visa, Mastercard, American Express and Discover Card

For Billing and Payment Inquiries call:
888-776-0942 or **201-360-6060**

amazon.com

Final Details for Order #111-1676190-3196211

Print this page for your records.

Order Placed: March 29, 2024
Amazon.com order number: 111-1676190-3196211
Order Total: $24.28

Shipped on March 30, 2024

Items Ordered	Price
1 of: *Maxone 320GB Ultra Slim Portable External Hard Drive HDD USB 3.0 for PC, Laptop, Mac, PS4, Xbox one - Charcoal Grey*	$22.12

Sold by: Maxone USA (seller profile)
Supplied by: Maxone USA (seller profile)

Condition: New

Shipping Address:
Bernie Jestrabek-Hart
100 LOCKEWOOD LN APT 126
SCOTTS VALLEY, CA 95066-3955
United States

Shipping Speed:
FREE Prime Delivery

Payment information

Payment Method:
Visa ending in [redacted]

Billing address
Adrienne Spiegel
[redacted]
SAN FRANCISCO, CA 94117-3237
United States

Item(s) Subtotal:	$22.12
Shipping & Handling:	$0.00
Total before tax:	$22.12
Estimated tax to be collected:	$2.16
Grand Total:	**$24.28**

Credit Card transactions

Visa ending in 2386: March 30, 2024:	$24.28

To view the status of your order, return to Order Summary.

Conditions of Use | Privacy Notice © 1996-2024, Amazon.com, Inc. or its affiliates

Back to top

English United States Help

Conditions of Use Privacy Notice Consumer Health Data Privacy Disclosure Your Ads Privacy Choices
© 1996-2024, Amazon.com, Inc. or its affiliates

amazon.com

Details for Order #114-4931819-5026626

Print this page for your records.

Order Placed: May 3, 2024
Amazon.com order number: 114-4931819-5026626
Order Total: $6.51

Not Yet Shipped

Items Ordered	Price
1 of: *Life on Wheels: For the Active Wheelchair User: For the Active Wheelchair User (Patient Centered Guides)*, Karp, Gary Sold by: Better World Books: South (seller profile) Supplied by: Other Condition: Used - Good Former library book; may include library markings. Used book that is in clean, average condition without any missing pages. Over 100 million books sold! 100% Money-Back Guarantee. Free & Fast Shipping!	$5.99

Shipping Address:
Adrienne Spiegel
Redacted
SAN FRANCISCO, CA 94117-3237
United States

Shipping Speed:
Standard Shipping

Payment information

Payment Method:
Visa ending in Redacted

Billing address
Adrienne Spiegel
Redacted
SAN FRANCISCO, CA 94117-3237
United States

Item(s) Subtotal:	$5.99
Shipping & Handling:	$0.00
Total before tax:	$5.99
Estimated tax to be collected:	$0.52
Grand Total:	**$6.51**

To view the status of your order, return to Order Summary.

Conditions of Use | Privacy Notice © 1996-2024, Amazon.com, Inc. or its affiliates

From: Adrienne Spiegel
To: Adrienne Spiegel
Subject: Amazon Kindle Invoice
Date: Wednesday, May 8, 2024 11:45:46 AM
Attachments: image001.png

amazon.com

Details for Order # D01-2272333-1030656
Print this page for your records.

Amazon.com order number: D01-2272333-1030656

Digital Order: May 8, 2024 Status: Pending

Items Ordered	Price
Life on Wheels: The A to Z Guide to Living Fully with Mobility Issues[Kindle Edition] By: Gary Karp Quantity: 1 Sold By: Amazon.com Services LLC	$13.29

Payment Information

Payment method
VISA Visa ending in 2386

Billing address
Adrienne Spiegel
Redacted
SAN FRANCISCO, CA 94117-3237
United States
Redacted

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Monday, April 25, 2022 10:54 PM
To: Accounting
Subject: 1457-1 Request for Reimbursement [IWOV-DMS.FID50920]

Please reimburse me $14.99 and bill the case for purchase of Brookdale CEO book.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Amazon.com <digital-no-reply@amazon.com>
Sent: Monday, April 25, 2022 7:52 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: Amazon.com order of D01-8201533-7753855.

[EXTERNAL MESSAGE NOTICE]

amazon

Order Confirmation

Hello Gay,

Thank you for shopping with us. All Kindle content, including books and Kindle active content, that you've purchased from the Kindle Store is stored in your Kindle library on Amazon.com.

Order Details

Order #D01-8201533-7753855

Placed on Monday, April 25, 2022

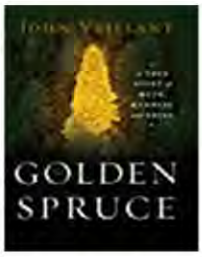
View order details

Item Subtotal:	$14.99
Total Before Tax:	$14.99
Tax Collected:	$0.00
Grand Total:	**$14.99**

Learn more about Kindle in Help.

We hope to see you again soon!
Amazon.com

Recommendations for items from across our store

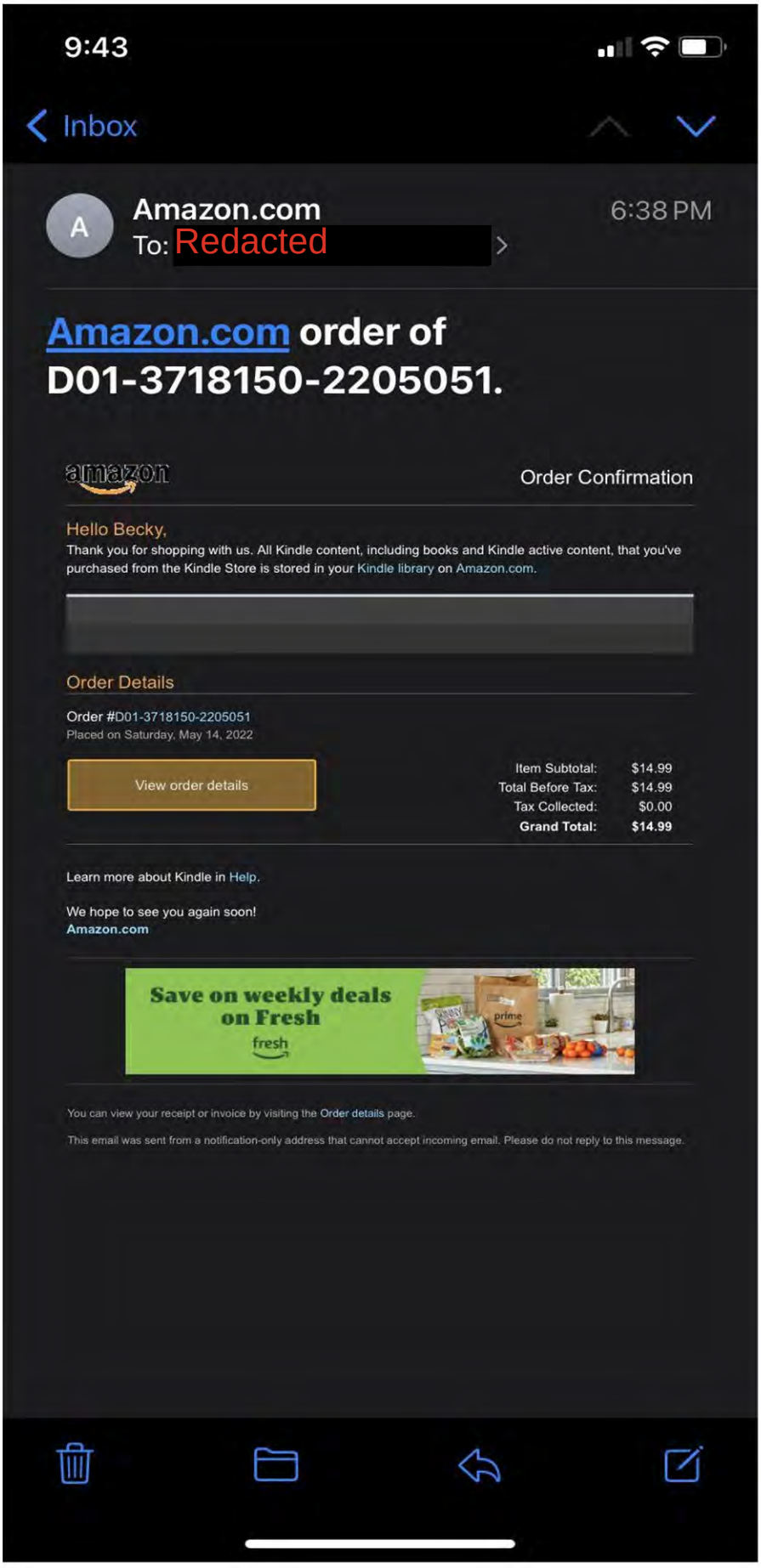


The Golden Spruce: A True Story of...
$9.99

The Matrix Reloaded
$3.99

You can view your receipt or invoice by visiting the Order details page.

This email was sent from a notification-only address that cannot accept incoming email. Please do not reply to this message.


9:43
Inbox
A
Amazon.com
To: Redacted
6:38 PM
Amazon.com order of D01-3718150-2205051.
amazon
Order Confirmation
Hello Becky,
Thank you for shopping with us. All Kindle content, including books and Kindle active content, that you've purchased from the Kindle Store is stored in your Kindle library on Amazon.com.
Order Details
Order #D01-3718150-2205051
Placed on Saturday, May 14, 2022
View order details
Item Subtotal: $14.99
Total Before Tax: $14.99
Tax Collected: $0.00
Grand Total: $14.99
Learn more about Kindle in Help.
We hope to see you again soon!
Amazon.com
Save on weekly deals on Fresh
fresh
prime
You can view your receipt or invoice by visiting the Order details page.
This email was sent from a notification-only address that cannot accept incoming email. Please do not reply to this message.

CourtCall

6383 Arizona Circle
Los Angeles, CA 90045
Phone: (888) 882-6878
Fax: (888) 883-2946
CourtCall.com

Court Conference® is a division of CourtCall®

INVOICE / RECEIPT

02/05/2020 12:35 PM

All amounts below are in **U.S. Dollars**

COURTCALL ID:	10361590
CASE NUMBER/NAME:	17-cv-03962 / Eidler et al v. Brookdale Senior Living, Inc. et al
CUSTOMER REF. NUMBER:	1457-1
PROCEEDING:	Court Approved Hearing
DATE OF HEARING:	Tuesday, February 4th, 2020 at 3:00 PM PT
FIRM NAME:	Rosen Bien Galvan & Grunfeld LLP
ATTORNEY/PARTY APPEARING:	Gay Grunfeld
TELEPHONE:	(415) 433-6830
FAX/EMAIL:	(415) 433-7104
BASIC FEE/LATE FEE:	$35.00
AMOUNT PAID:	$35.00
PAYMENT NOW DUE:	$0.00

The duration of this call was 35 minutes. The 'Basic Fee' above was calculated as follows: $35.00 base fee for the first 45 minutes plus 0 x 15-minute increment(s) at $7.50 each.

Payment Details

Method	Type	Amount	Reference	Date/Time
Credit	Charge	$35.00	American Express ending in 1057	2/5/2020 12:35:05PM

If the 'Payment Now Due' indicated above is zero, no payment is due and this receipt is for your records only; otherwise, the amount indicated is now due.

If there is an amount due, please remit your payment upon receipt of this notice. If you have already sent payment please contact our Accounting Department as our records do not reflect receipt of payment at the time this notice was sent. IF PAYMENT IS NOT RECEIVED, FUTURE SERVICE MAY BE DENIED AND/OR THE COURT MAY BE ADVISED OF YOUR REFUSAL TO PAY.

PAYMENT BY CREDIT CARD or COURTCALL DEBIT ACCOUNT: Payment can be made online by registering and logging in at www.courtcall.com or by calling (888) 882-6878 and selecting option '5' for the Accounting Department. Please have your CourtCall Debit Account number or complete credit card billing address in addition to the credit card number, expiration date and cardholder's full name available when making payment.

PLEASE DETACH AND RETURN THE PORTION BELOW IF PAYING BY CHECK OR MONEY ORDER

PAYMENT BY CHECK OR MONEY ORDER: If a balance is due detach and mail this payment section with your check, payable to: **CourtCall LLC, 6383 Arizona Circle. Los Angeles, CA 90045.** Please write the CourtCall ID number in the memo section of your check. Please note: CourtCall does not accept personal checks.

COURTCALL ID:	10361590
CASE NAME/NUMBER:	17-cv-03962 / Eidler et al v. Brookdale Senior Living, Inc. et al
CUSTOMER REF. NUMBER:	1457-1
PROCEEDING:	Court Approved Hearing
DATE OF HEARING:	Tuesday, February 4th, 2020 at 3:00 PM PT
FIRM NAME:	Rosen Bien Galvan & Grunfeld LLP
ATTORNEY/PARTY APPEARING:	Gay Grunfeld
TELEPHONE:	(415) 433-6830

Copyright © 2020 CourtCall, LLC. All Rights Reserved.

18-Sep	Superior Court of Alam	1457-1 Reserve	5.00
18-Sep	Superior Court of Alam		20.00

From: Kira Hansen <KHansen@rbgg.com>
Sent: Thursday, May 5, 2022 2:25 PM
To: Accounting
Subject: FW: Accounting: 1457-1 Amex Charge

Categories: AMEX

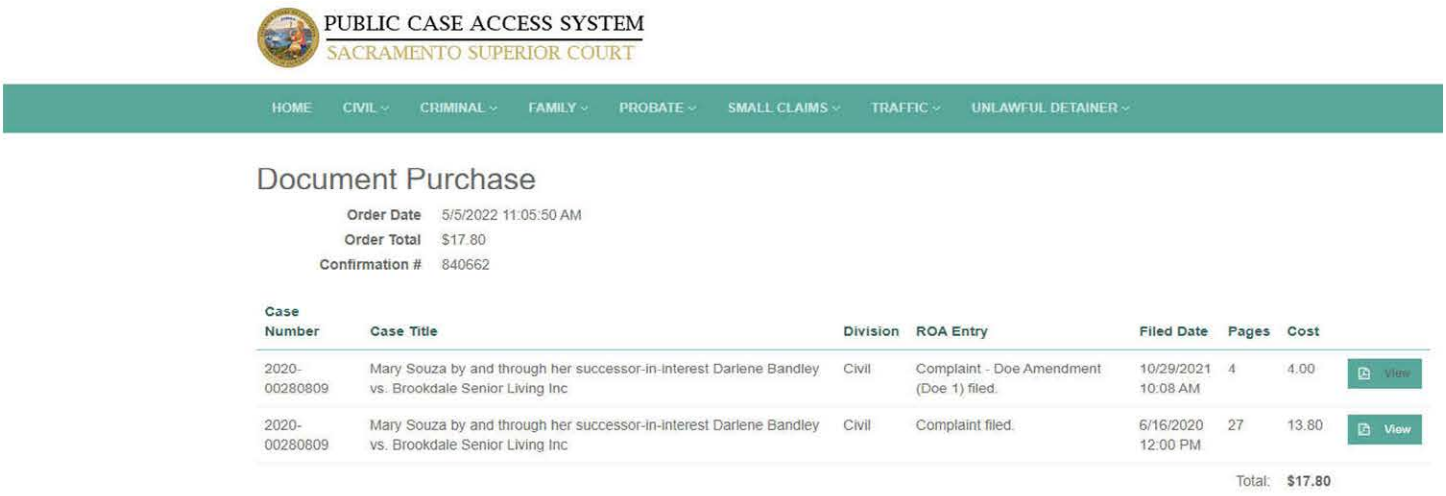
Receipt on my Amex.

Kira Hansen
Office Administrator
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Rebecca (Becky) Berman <RBerman@rbgg.com>
Sent: Thursday, May 5, 2022 11:13 AM
To: Kira Hansen <KHansen@rbgg.com>
Subject: Accounting: 1457-1 Amex Charge

Hi Kira,

I just used the Amex to purchase two pleadings from Sacramento Superior. This is for Brookdale and should be billed to 1457-1. I haven't received an email confirmation yet, but screenshot is below:



PUBLIC CASE ACCESS SYSTEM
SACRAMENTO SUPERIOR COURT

HOME | CIVIL | CRIMINAL | FAMILY | PROBATE | SMALL CLAIMS | TRAFFIC | UNLAWFUL DETAINER

Document Purchase

Order Date 5/5/2022 11:05:50 AM
Order Total $17.80
Confirmation # 840662

Case Number	Case Title	Division	ROA Entry	Filed Date	Pages	Cost	
2020-00280809	Mary Souza by and through her successor-in-interest Darlene Bandley vs. Brookdale Senior Living Inc	Civil	Complaint - Doe Amendment (Doe 1) filed.	10/29/2021 10:08 AM	4	4.00	View
2020-00280809	Mary Souza by and through her successor-in-interest Darlene Bandley vs. Brookdale Senior Living Inc	Civil	Complaint filed.	6/16/2020 12:00 PM	27	13.80	View
					Total:	$17.80	

Let me know if you need anything else.

Thank you!

Superior Court of Alameda County Public Portal

Receipt Details

Receipt Detail

Payment Type	PROFILE
Payment Method	MasterCard
Amount	19.00
Payment Date	2023-01-11 15:36:13
Transaction Status	APPROVED
Response	This transaction has been approved.
Authorization Code	025878
Card Number	XXXX[redacted]
Card Type	CC
Transaction ID	43872595052
First Name	
Last Name	
Company	
Address Street	
City	
State	
Zip	
eMail Address	

Back to My Receipts

Copyright © Journal Technologies, USA. All rights reserved.

Alamo

RA 546285863 Bil @
Rental 13-FEB-2019 12:14 PM
JOHN WAYNE ARPT
Return 13-FEB-2019 02:29 PM
JOHN WAYNE ARPT

JENNY YELIN
Vehicle # KL840929
Model VERSA
Class Driven CCAR Class Charged CCAR
License BGIR829 State/Province CA
M/Kms Driven 19
M/Kms Out 1394
M/Kms In 1413

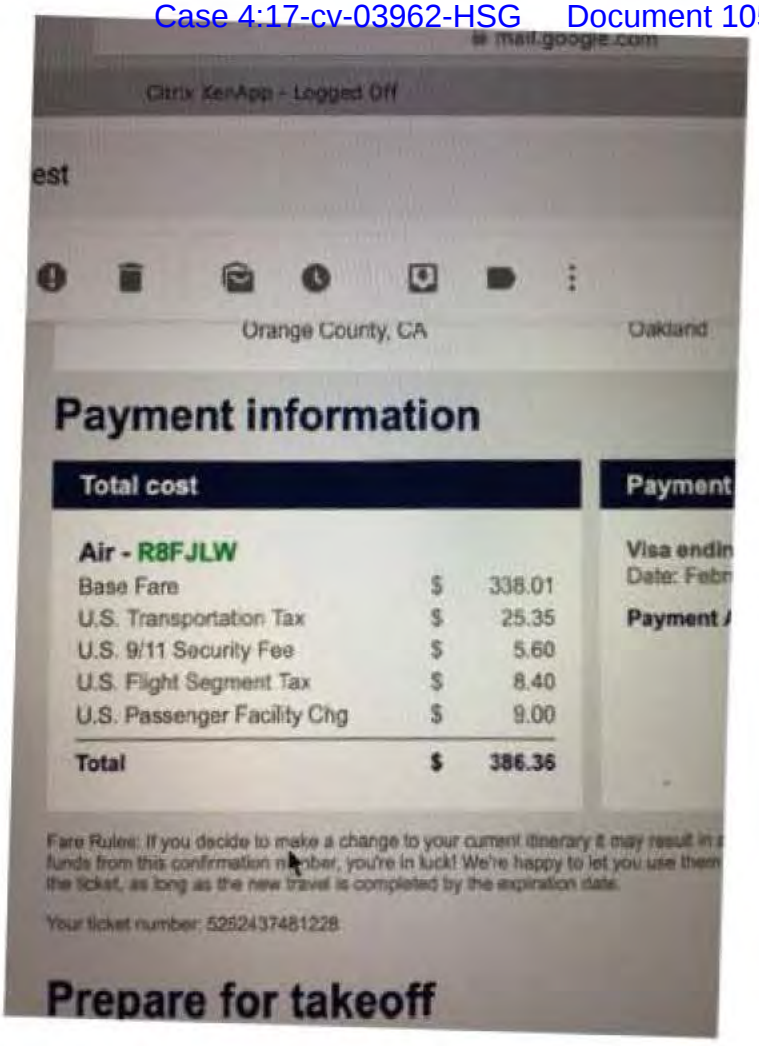
Charges	No Unit	Price	Amount
T & M	1 Days	41.23	41.23*
UNLIM M/KM	0 M/Kms		0.00*
CONCESSION FEE RECOVERY			4.73*
TOURISM COMMISSION REC			1.44
VEHICLE LICENSE RECOVERY			1.30
SALES TAX @7.750 %			3.55

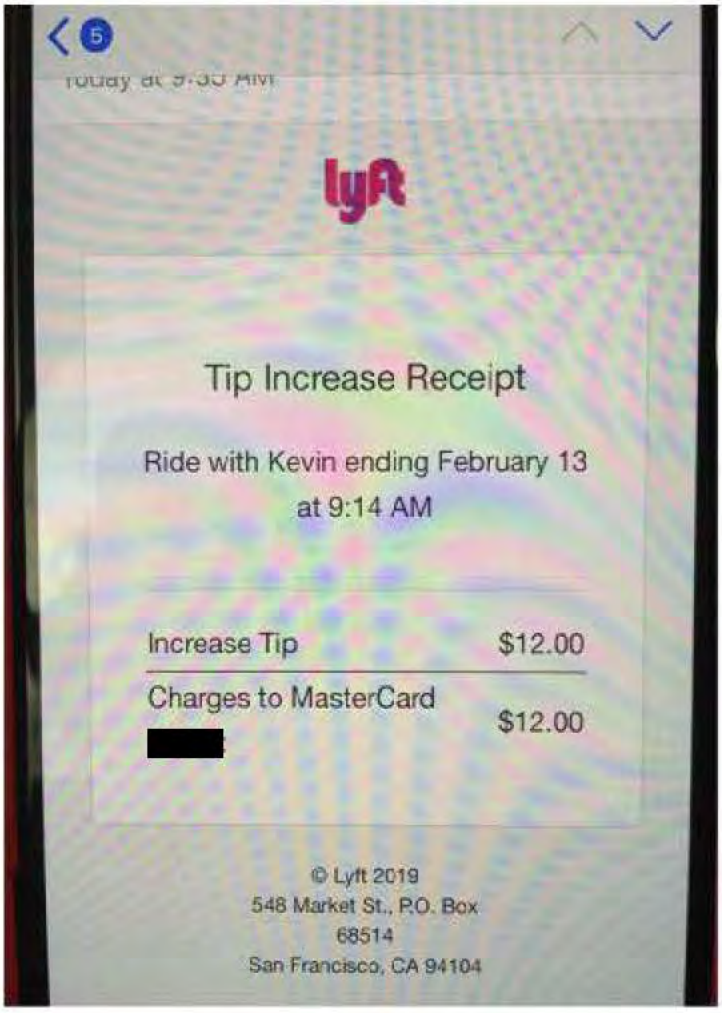
Total Charges USD 52.26

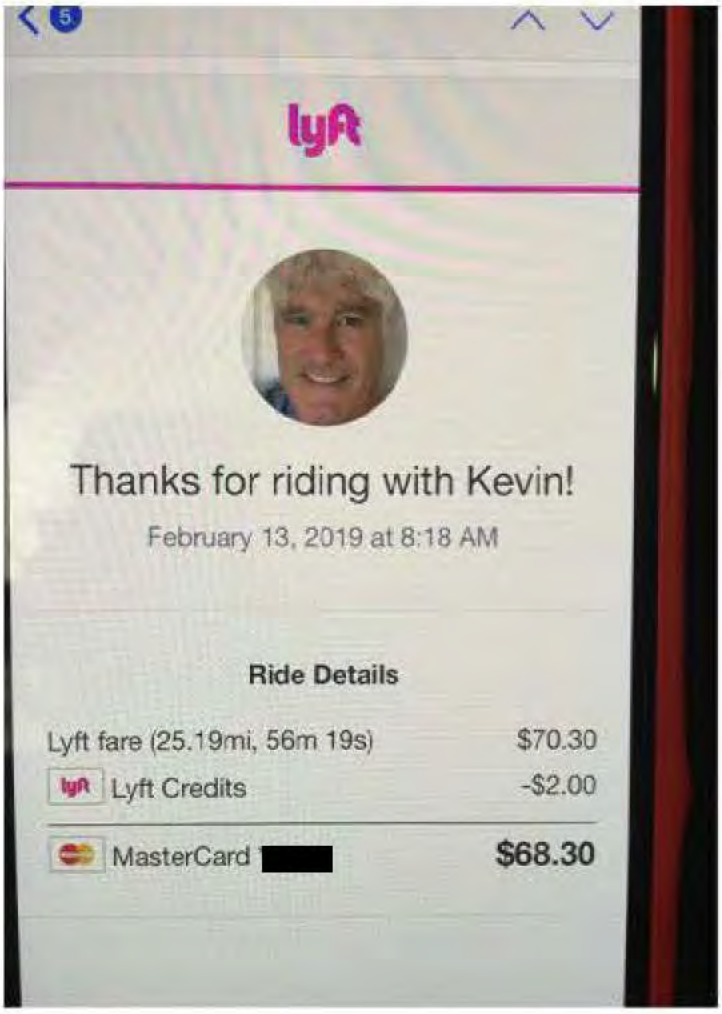
Deposit Visa [redacted]

Amount Due USD 52.26

* Taxable Items
Subject to Audit
Customer Service Number 1-800-445-3664


mail.google.com
Citrix XenApp - Logged Off
est
Orange County, CA
Oakland
Payment information
Total cost
Payment
Air - R8FJLW
Base Fare $ 338.01
U.S. Transportation Tax $ 25.35
U.S. 9/11 Security Fee $ 5.60
U.S. Flight Segment Tax $ 8.40
U.S. Passenger Facility Chg $ 9.00
Total $ 386.36
Visa endin
Date: Febr
Payment A
Fare Rules: If you decide to make a change to your current itinerary it may result in a
funds from this confirmation number, you're in luck! We're happy to let you use them
the ticket, as long as the new travel is completed by the expiration date.
Your ticket number: 5262437481228
Prepare for takeoff


Tip Increase Receipt
Ride with Kevin ending February 13
at 9:14 AM
Increase Tip $12.00
Charges to MasterCard
[redacted]
$12.00
© Lyft 2019
548 Market St., P.O. Box
68514
San Francisco, CA 94104


lyft
Thanks for riding with Kevin!
February 13, 2019 at 8:18 AM
Ride Details
Lyft fare (25.19mi, 56m 19s) $70.30
Lyft Credits -$2.00
MasterCard [redacted] $68.30

OPERATED BY
HMS HOST

STARBUCKS COFFEE C
JOHN WAYNE AIRPORT

365689 Kimberly

CHK 2041 GST 1
FEB13 19 2:52PM

TO GO

1 SPNDFT SP GRPFRT 2.45
Spindrift Sparkling Water
Grapefruit 12oz
850397004071
1 THATS IT APL MGO 2.30
That's it Apple Mango

850126007571
1 HIPPEAS WHT CHED 1.95
Hippeas White Cheddar 1oz

SUBTOTAL 6.70
TAX 0.52
AMOUNT PAID 7.22
VISA CD (X10277
7.22
Closed FEB13 02:52PM

WANT TO HEAR YOUR FEEDBACK!
PLEASE CONTACT 1-877-672-7467
OR CUSTOMERSERVICE@HMSHOST.COM
TO SHARE YOUR EXPERIENCE.

Credit Card Reconciliation

ROSEN BIEN GALVAN & GRUNFELD LLP

CREDIT CARD CHARGE REPORT
For GRUNFELD AM EX

Date	Case No.	Description[1]	Days[2]	Approval	Amount
7-6-18	1457-1	Parking & meal		GG	
		for travel to oral ~~argument~~ MOOT ARGUMENT			

Tender Greens
30 Fremont St
San Francisco, CA 94105
(415) 543-5200

Server: Delmy
Cashier: Ana
Gay Phn/1
Guests: 0

07/06/2018
12:41 PM
#40048

Order Type: PHONE ORDER

Tuna Nicoise	14.00
Chinese Chicken	13.00
Subtotal	27.00
Tax	2.39
4% Surcharge	1.08
Total	30.47
AMEX	30.47
Auth:517972	
Balance Due	0.00

"Eat food. Not too much. Mostly plants."
-Michael Pollan
tendergreens.com

--- Check Closed ---

****
Scan this barcode to earn points

433876899223

Introducing the Tender Greens app
Download our app to order ahead and earn
Details at app.tendergreens.com
7 days until barcode expires
****

THE TOWERS
EMERYVILLE
2000 Powell Street Emeryville, CA 94608
510-594-3117

Transaction #: 1056887
PIN #: E'25
Parker #: None
Parker Group: None
In Date/Time: 07/06/18 09:55AM
Out Date/Time: 07/06/18 12:15PM
Parking Type: Self Park
Rate: - GENERAL RATE -

Parking SubTotal:	$12.00 X 1
Tax SubTotal:	12.00
Grand Total:	0.00
Amex (1008)	12.00

Peet's Coffee & Tea
3419 California Street
San Francisco, CA 94118
(415) 221-8506

Host: Justin
GAY

07/06/2018
9:17 AM
40173

S Caffe Latte	3.55
nonfat milk	
with room	
N Coffee GAI Gaia	2.60
Checked In	0.00
Subtotal	6.15
Tax	0.00
Ordered Total	6.15
AMEX #XXXXXXXXXXX[redacted]	6.15
Auth:586962	

SIGNATURE :_____

The secret behind great coffee is the people who make it. If you are ready for a bold career change, take a look at Peet's.
www.peets.com/careers

f a meal

the num

ease include

AT&T
9:35 AM
100%
Peets Coffee OAK Airport Terminal 2
$24.23
Coffee (Hot Medium) $2.55
Bottle Water Large $5.79
Plain Croissant $3.99
Greek Yogurt Parfait $6.25
Marshmallow Bar Sweet Street $3.00
Purchase Subtotal $21.58
Employee Benefits (3%) $0.65
Sales Tax (9.25%) $2.00
Total $24.23

Peets Coffee
San Francisco Int' Airport
San Francisco, CA 94128
(650) 821-0808

[redacted] PEET'S 68 [redacted]

Date Jun1 '19 05:53AM
Card Type: AMEX
Acct #: XXXXXXXXXXX[redacted]
Card Entry: SWIPED
Trans Type: PURCHASE
Trans Key: KTK0094999582410
Auth Code: 557 -6
Check: 3505
Server: 317 Sweh

Total 9.37
Thank You.

Effective February 2015, a 2%
Airport EE Benefits Surcharge
will apply to all pre-tax food
and beverage purchases.

****
* Customer Copy *
****

Renato's Ristorante Italiano
16388 Brookhurst Street
Westminster, CA 92683
714-839-5755

Date:	06/11/19
Time:	1:00 PM
Server:	15, Roberto
Order:	13720
Description:	Table 8
Card Type:	AMEX
Card No:	XXXXXXXXXXX[redacted]
Expires:	XX/XX
Entry:	Chip
Auth. Code:	623868
Ref. Number:	5
Response:	OK

Purchases: $ 34.75

Tip: $_____

Total: $_____

I agree to pay the above total amount according to the card issuer agreement.

GRUNFELD/GAY

Auth. Code:	823868
Ref. Number:	5
Response:	OK
AID:	A0000000250108O1
APPLAB:	AMERICAN EXPRESS
APPN:	
CVM:	E

OPERATED BY

HMS HOST

STARBUCKS COFFEE B
JOHN WAYNE AIRPORT

288610 Elizabet

CHK 3196 GST 1
JUN11 '19 8:14AM

DINE IN

1	NTR FIJI M	3.48
	762111239273	
1	POPCORN BUTTER	1.50
	Starbucks Popcorn 1oz	
	SUBTOTAL	4.98
	TAX	0.39
	AMOUNT PAID	5.37
	A1642605 XXXXC08	
	AMEX CC	5.37

--288610 Closed JUN11 08:15AM---

WE WANT TO HEAR YOUR FEEDBACK!
PLEASE CONTACT 1 877-672-7467
OR CUSTOMERSERVICE@HMSHOST.COM
TO SHARE YOUR EXPERIENCE.

STORE ID: SWASTA06

AMEX Reconciliation

All billed to 1457-1 6-17-19

Lunch for expert, photographer + me

0

EL PORTAL WEST
1100 CALLOWAY
BAKERSFIELD, CA 93312
(661) 829-2737

Table 8

PRECHECK (4) Check 40009
Server: Adrian 220 Guests 1
MON 6/17/19 1:09pm

1 CHICKEN SALAD	7.95
1 CHICKEN SALAD	7.95
1 L.S.ToastGrnde	6.95
1 SOFT DRINK	2.95
1 SOFT DRINK	2.95
1 SOFT DRINK	2.95
Sub/Ttl	31.70
Tax	2.62
Total Due	34.32

Order Number 40008

Gratuity_____

THANK YOU FOR DINING
PLEASE COME AGAIN

EL PORTAL WEST
1100 CALLOWAY DRIVE SUITE 300
BAKERSFIELD CA 93312
661-829-2737

Terminal ID: ********778 ***0
6/17/19 1:14 PM
SERVER #: 220
AMERICAN EXPRESS - INSERT
AID: A0000000250108O1
ACCT #: **********[redacted]
CREDIT SALE
UID: 916837317621 REF #: 6838
BATCH #: 993 AUTH #: 869476
AMOUNT $34.32

TIP $_____

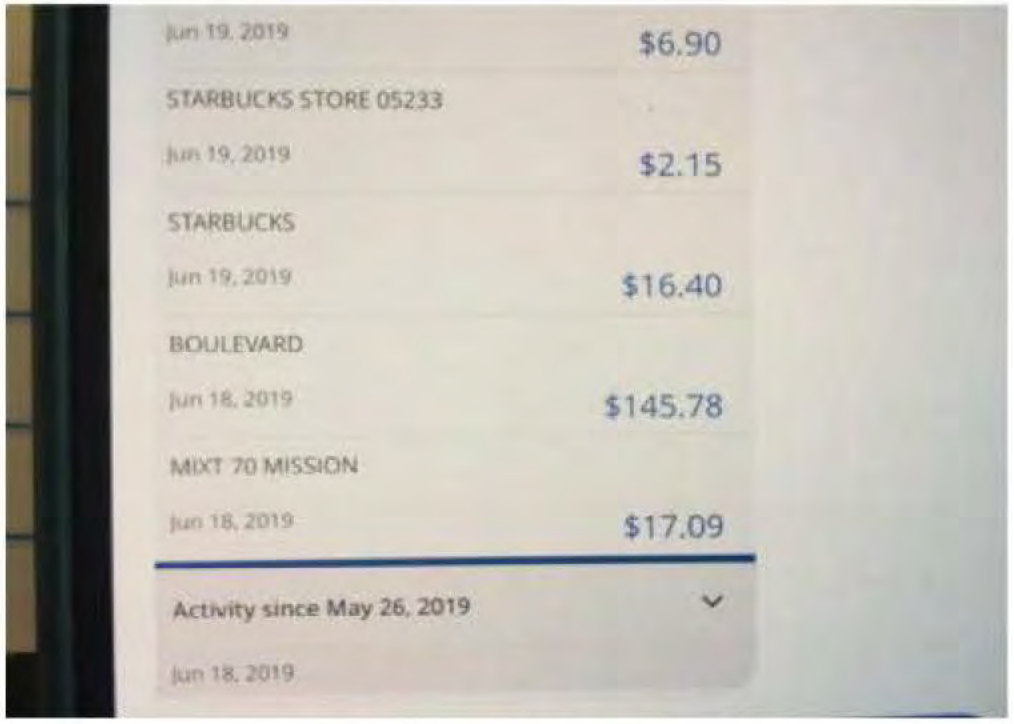
TOTAL $_____

APPROVED

ARQC - A746ID432D2B4780
CUSTOMER COPY

All connected to Inspection 9 Riverwalk

TRAVEL for GCG from Bakersfield to SF


Jun 19, 2019
$6.90
STARBUCKS STORE 05233
Jun 19, 2019
$2.15
STARBUCKS
Jun 19, 2019
$16.40
BOULEVARD
Jun 18, 2019
$145.78
MIXT 70 MISSION
Jun 18, 2019
$17.09
Activity since May 26, 2019
Jun 18, 2019

Starbucks Coffee #5233
9000 Brooks Rd
Windsor, CA 707-838-9875

CHK 663840
06/19/2019 08:43 AM
2243581 Drawer: 1 Reg: 2

T1 Pike Place	2.15
Visa	2.15
XXXXXXXXXXX0277	
Subtotal	$2.15
Total	$2.15
ıange Due	$0.00

-------- Check Closed ----------
06/19/2019 08:43 AM

Join our loyalty program
Starbucks Rewards®
Sign up for

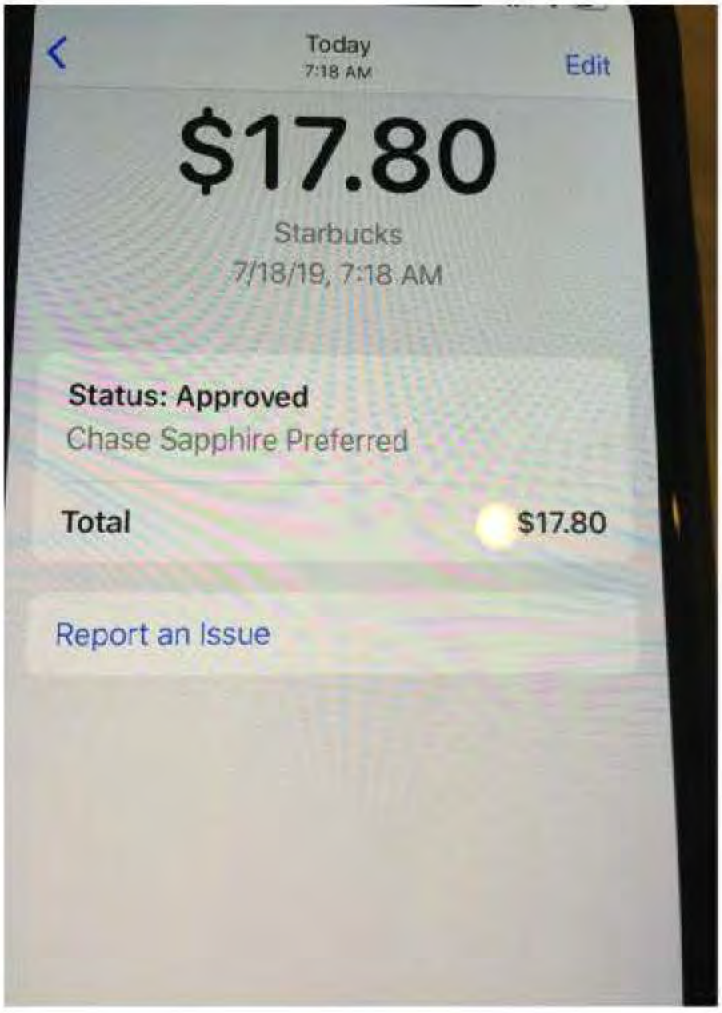
Starbucks Coffee #5233
9000 Brooks Rd
Windsor, CA 707-838-9875

CHK 719651
06/19/2019 01:37 PM
2584849 Drawer: 1 Reg: 1

Hippeas Wht Chddr	1.95
Apple Bluebry Bar	1.95
Pineapple 14.5oz	2.95
Bottle Dep/Crv	0.05
Visa	6.90
XXXXXXXXXXXX0277	
Subtotal	$6.90
Total	$6.90
Change Due	$0.00

Check Closed
06/19/2019 01:37 PM

Merchandise, Packaged Coffee and Packaged Tea on this receipt may be returned or exchanged


Today
7:18 AM
Edit
$17.80
Starbucks
7/18/19, 7:18 AM
Status: Approved
Chase Sapphire Preferred
Total
$17.80
Report an Issue

WYL
DER

Wylder Space
6249 CA 9
Felton, CA 95018
(831) 704-7494
www.wylderspace.com

December 10, 2021
12:15 PM
Lane

PURCHASE

Receipt: dYBG
Ticket: Pickup 1215
Authorization: 06256C

CHASE VISA
AID A0 00 00 00 03 10 10

TO GO

Tomato Basil Soup x 2	**$8.50**
Cup	
Classic Cobb Salad x 2	**$24.50**
Ni egg ni crouton no dressing add avocado	
Subtotal	$33.00
Sales Tax	$2.97
Tip	$5.40
Total	**$41.37**
Visa [redacted] (Chip)	$41.37

Amy Xu

TAQUERIA VALLARTA
6272 HWY 9
FELTON, CA 95018

CHK# 154 T/O 36
PATY # 1
12/13/2021 13:03 0 CASHIER 1

DINING

1	(3) ENCH PLATE	13.99
1	----------	0.00
1	----------	0.00
1	----------	0.00
1	----------	0.00
1	----------	0.00
1	(3) ENCH PLATE	13.99
1	----------	0.00
1	***TO-GO***	0.00
1	***TO-GO***	0.00
SUBTOTAL:		27.98
TAX:		2.52

A#154 T#3120 ----------

TOTAL 30.50
CASH 30.50
CHANGE: 0.00

CHECK # 154 12/13/2021 13:07 CLOSED

FOR ORDERS TO-GO
CALL(831) 335-4264

LP5H41

Manage reservation

Purchase summary

1 Adult (18-64)		
Taxes and fees		$291.17
Additional services		$50.63
Economy Plus		
SFO to SNA	Jenny Yelin	$75.00
SNA to SFO	Jenny Yelin	
Total		
Credit card payment: $416.80 (MasterCard-** [redacted]		**$416.80**

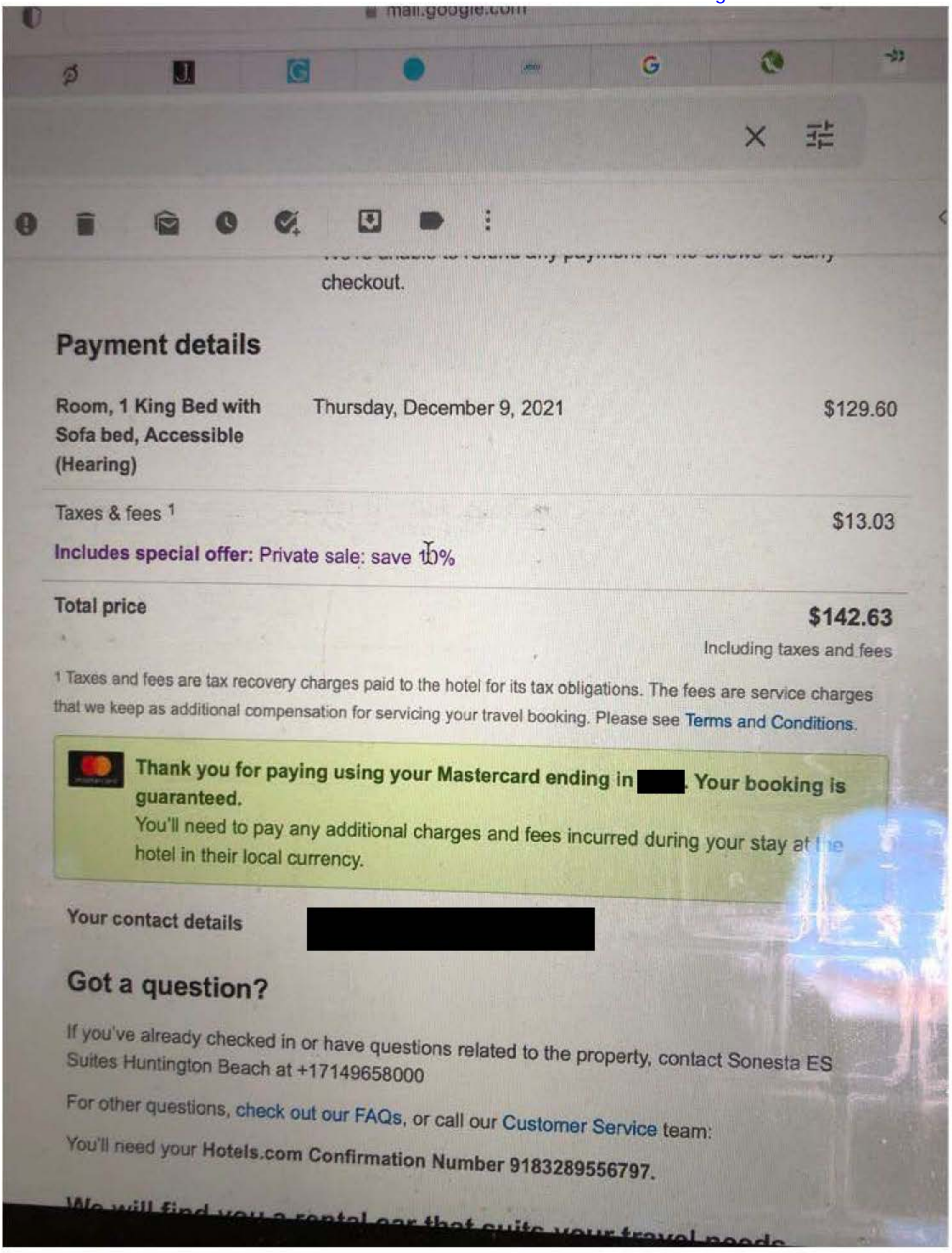
Trip summary

Thu, Dec 09, 2021

UA 2096

Nonstop

8:55 am	✈	10:33 am	Duration: 1h 38m
San Francisco, CA, US (SFO)		Orange County, CA, US (SNA)	United Economy (W)
			Meals are not offered for this flight



checkout.

Payment details

Room, 1 King Bed with Sofa bed, Accessible (Hearing)	Thursday, December 9, 2021	$129.60
Taxes & fees [1]		$13.03

Includes special offer: Private sale: save 10%

Total price **$142.63**

Including taxes and fees

1 Taxes and fees are tax recovery charges paid to the hotel for its tax obligations. The fees are service charges that we keep as additional compensation for servicing your travel booking. Please see Terms and Conditions.

Thank you for paying using your Mastercard ending in [redacted]. Your booking is guaranteed.
You'll need to pay any additional charges and fees incurred during your stay at the hotel in their local currency.

Your contact details [redacted]

Got a question?

If you've already checked in or have questions related to the property, contact Sonesta ES Suites Huntington Beach at +17149658000

For other questions, check out our FAQs, or call our Customer Service team:

You'll need your **Hotels.com Confirmation Number 9183289556797.**

We will find you a rental car that suits your travel needs

lyft

DECEMBER 10, 2021 AT 5:34 PM

Thanks for riding with Ronaldo!

100% of tips go to drivers. Add a tip

Lyft fare (12.29mi, 28m 57s)	$34.99
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee	$3.00
Tip	$5.70
lyft Lyft Credits	-$5.00

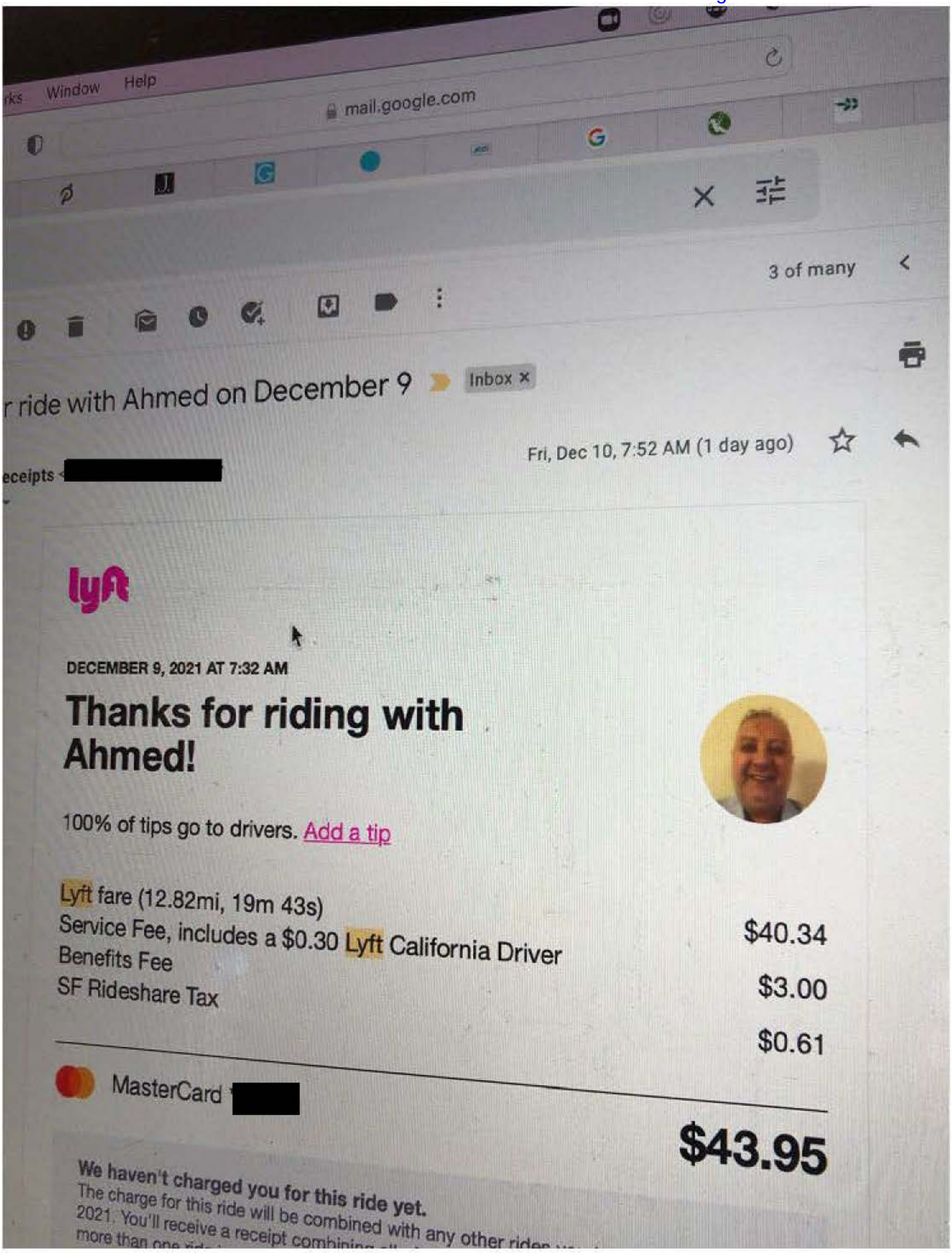
MasterCard [redacted]

$38.69

We haven't charged you for this ride yet.
The charge for this ride will be combined with any other rides you take on December 10, 2021. You'll receive a receipt combining all of your day's charges, whenever you take more than one ride in a single day.

The fare above includes any other Fees and Other Charges, as applicable.

© OpenStreetMap


rks Window Help
mail.google.com
3 of many
r ride with Ahmed on December 9
Inbox ×
Fri, Dec 10, 7:52 AM (1 day ago)
eceipts <[redacted]
lyft
DECEMBER 9, 2021 AT 7:32 AM
Thanks for riding with Ahmed!
100% of tips go to drivers. Add a tip
Lyft fare (12.82mi, 19m 43s) $40.34
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee $3.00
SF Rideshare Tax $0.61
MasterCard [redacted]
$43.95
We haven't charged you for this ride yet.
The charge for this ride will be combined with any other rider
2021. You'll receive a receipt combining
more than one

Chips

22 fl oz Soda/Iced Tea

Bag Total	$14.85
Subtotal	$14.85
Tax	$1.15
Total	**$16.00**

PAYMENT METHOD

Credit Card (ending in [redacted])	- $16.00

REAL FOODPRINT

Your order makes a difference. See how Chipotle's real ingredients reduce the impact on the planet compared to conventional ingredients.

CAR CLASS Charged:	Q6	MILEAGE	In: 41,460
Rented:	C		Out: 41,439
Reserved:	Q6		Driven: 21

RENTAL CHARGES

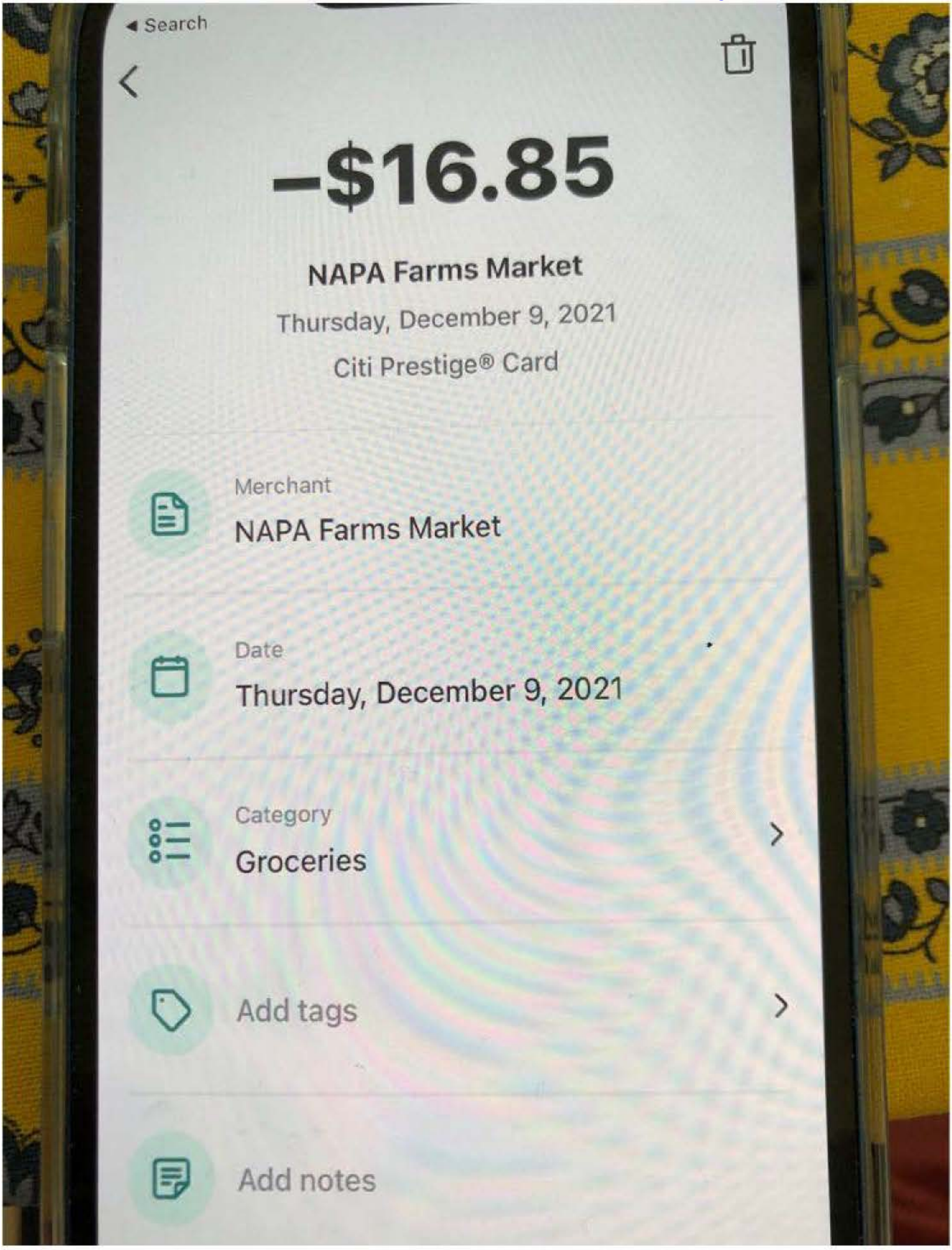
DAYS	1 @	69.20	69.20
EXTRA HRS	4 @	11.76	47.04
SUBTOTAL			116.24
CONCESSION FEE RECOVERY			11.71
CA TOURISM FEE			4.07
LICENSE & TAX REIMBURSEMENT			2.14
TAX		7.75%	10.09
TOTAL CHARGES			144.25 USD

THANK YOU FOR RENTING FROM THRIFTY

Rental Agreement No:	192254624
Date:	12/11/2021
Document:	961003194775

Renter: JENNY YELIN

Account No.: ********** [redacted] MC


Search
−$16.85
NAPA Farms Market
Thursday, December 9, 2021
Citi Prestige® Card
Merchant
NAPA Farms Market
Date
Thursday, December 9, 2021
Category
Groceries
Add tags
Add notes

The Brave Bean
(657)339-2223
9430 Warner Ave #N
Fountain Valley, CA 92708

Take Out

T

Server: AM D
Check #3 T
Ordered: 12/9/21 11:27 AM

PopChicks Medium 8	$10.95
Tossed Honey Chipotle Ranch	$1.00
Subtotal	$11.95
Tax	$1.05
Tip	$1.79
Total	$14.79

Input Type C (EMV Chip Read)
Mastercard xxxxxxxx[redacted]

Transaction Type	Sale
Authorization	Approved
Approval Code	015902
Payment ID	WFKyqrYWWTqj
Application ID	A0000000041010
Application Label	Mastercard
Terminal ID	7913f2ecdc5a3900
Card Reader	BBPOS

Suggested Additional Tip:
+ 2%: (Tip $0.24 Total $13.24)
+ 3%: (Tip $0.36 Total $13.36)
+ 5%: (Tip $0.60 Total $13.60)
+ 7%: (Tip $0.84 Total $13.84)

HMS HOST

Starbucks B* #16396
John Wayne/ Orange County AP (Santa Ana
2912 Yesenia WS#: 1

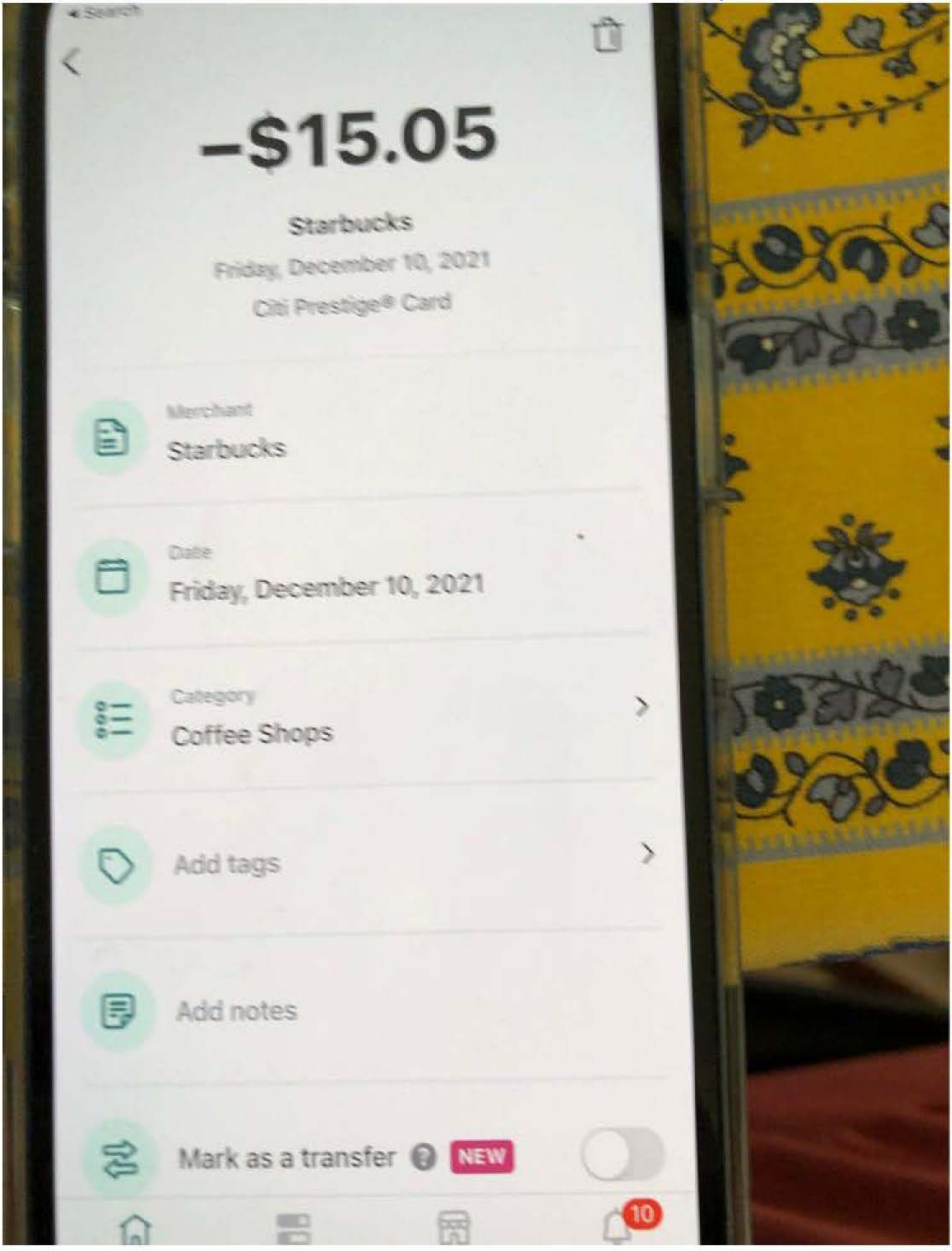
CHK 28656
12/10/2021 3:05 PM

To Go

1 APPLE & MANGO BAR	2.30
1 GR PASNTGO TEA LEM	3.80
PASSION TEA BASE	
LIQUID CN SUGAR	
LEMONADE	
1 MARSHMALLOW BR	2.75
Subtotal	$8.85
Tax	$0.69
Payment	$9.54
Change Due	**$0.00**
MasterCard	$9.54
XXXXXXXXXXXX[redacted]	

Check Closed
12/10/2021 3:06 PM

WE WANT TO HEAR YOUR FEEDBACK!
PLEASE CONTACT 1-877-672-7467


-$15.05
Starbucks
Friday, December 10, 2021
Citi Prestige® Card
Merchant
Starbucks
Date
Friday, December 10, 2021
Category
Coffee Shops
Add tags
Add notes
Mark as a transfer
NEW
10

18

Your ride with Elson on December 17

lyft

DECEMBER 17, 2021 AT 7:05 AM

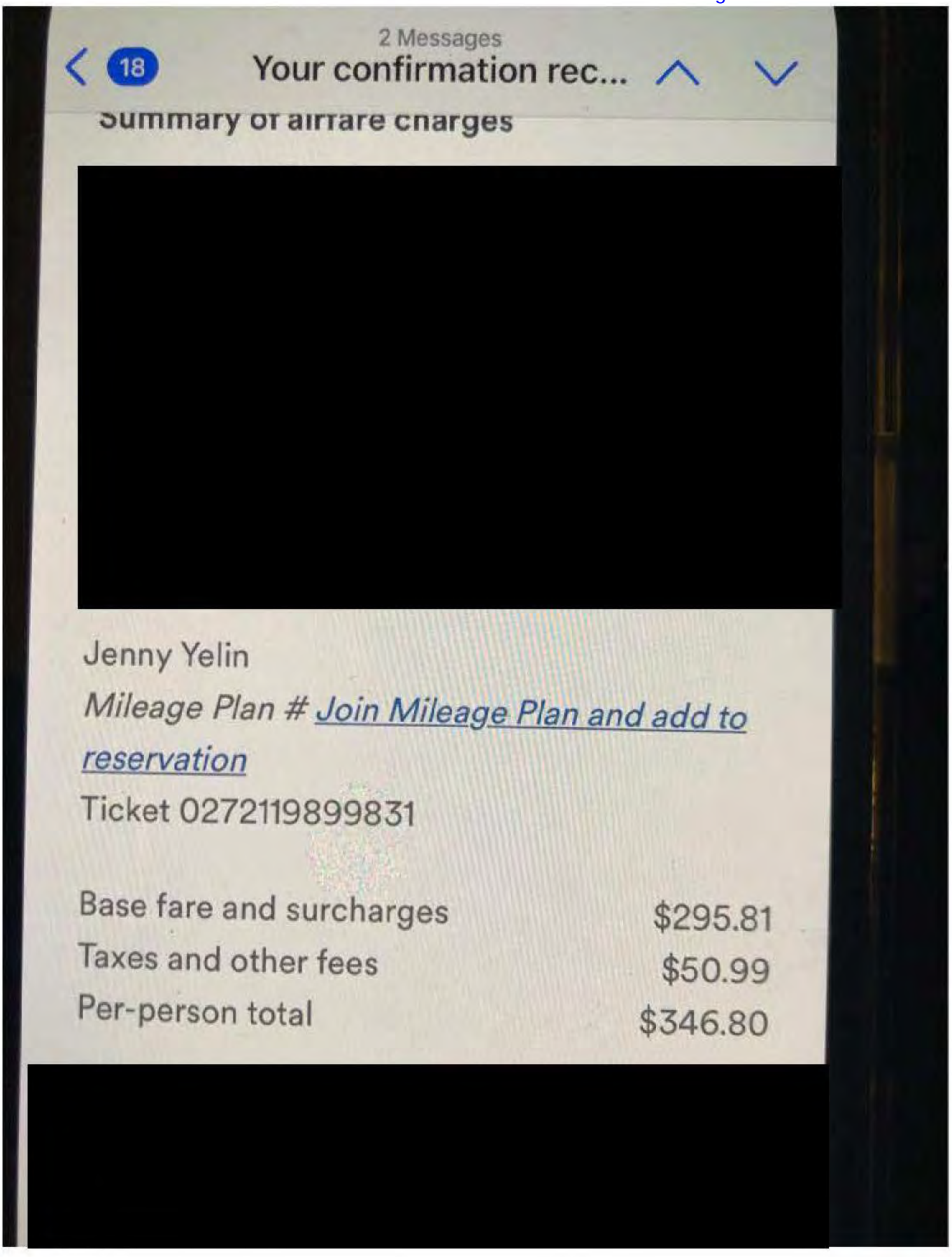
Thanks for riding with Elson!

100% of tips go to drivers. Add a tip

Lyft fare (14.06mi, 21m 15s)	$37.26
Service Fee, includes a $0.30 Lyft	
California Driver Benefits Fee	$3.00
SF Rideshare Tax	$0.56
Tip	$6.12

MasterCard [redacted]

$46.94


2 Messages
18
Your confirmation rec...
Summary of airfare charges
[redacted]
Jenny Yelin
Mileage Plan # Join Mileage Plan and add to reservation
Ticket 0272119899831
Base fare and surcharges $295.81
Taxes and other fees $50.99
Per-person total $346.80
[redacted]

MANAGE

light	Departs	Arrives	Class	Trav
Alaska laska 3450 mbraer ERJ 175	San Francisco (SFO) Fri, Dec 17 8:45 am	Orange County/Santa Ana (SNA) Fri, Dec 17 10:17 am	Y (Coach)	Jenn

perated By SkyWest Airlines as AlaskaSkyWest. Check in with Alaska Airlines.

Alaska aska 3413 braer ERJ 175	Palm Springs (PSP) Wed, Dec 22 10:55 am	San Francisco (SFO) Wed, Dec 22 12:27 pm	N (Coach)	Jenn

erated By SkyWest Airlines as AlaskaSkyWest. Check in with Alaska Airlines.

ditional information

hibited hazardous materials

Federal Government has specific restrictions about hazardous materials in ry-on and checked baggage. Failure to declare hazardous materials may result ivil and criminal penalties. For more information, visit: the FAA website.

mary of airfare charges

ny Yelin

Enter Mileage Program

Ticket 0272122337085

vious ticket 0272119899831)

lew Ticket Value	$576.80
dditional Amount Due	$230.00
Per person total	$230.00

charges for air travel — USD $230.00

all taxes, fees and charges

SOBHY YOUSEF
XXXXXXXXX2881
1788 N PALM CANYON D
PALM SPRINGS, CA
92262
12/18/2021 387131997
11:11:15 AM

XXXXXXXXXXXX2818
Mastercard
INVOICE 919364
AUTH 743642

PUMP# 5
Regular 2.745G
PRICE/GAL $4.699

FUEL TOTAL $ 12.90

CREDIT $ 12.90

Napa Farms Market
SFO International Airport
Terminal 2
San Francisco, CA 94128
650-821-9312

Cashier: Sweh Z
Date: 12/17/21, 7:51 AM

Transaction Type:	Sale
Entry Method:	Chip Read
Mode:	Issuer
AID:	A0000000041010
TVR:	0000008000
IAD:	011060700122000046 8A00000 000000000FF
TSI:	E800
ARC:	00

Drip Coffee 12oz	$3.95
Muffins	$3.95

Total Item Count:	2

Subtotal:	$7.90
EE Benefit:	$0.16
Total Tax:	$0.75

Total:	**$8.81**
Paid With: Mastercard	XXXX[redacted]
Total:	$8.81
Tip:	$0.79
Total Paid:	$9.60

OPERATED BY
HMS HOST

FARMERS MARKET
JOHN WAYNE AIRPORT

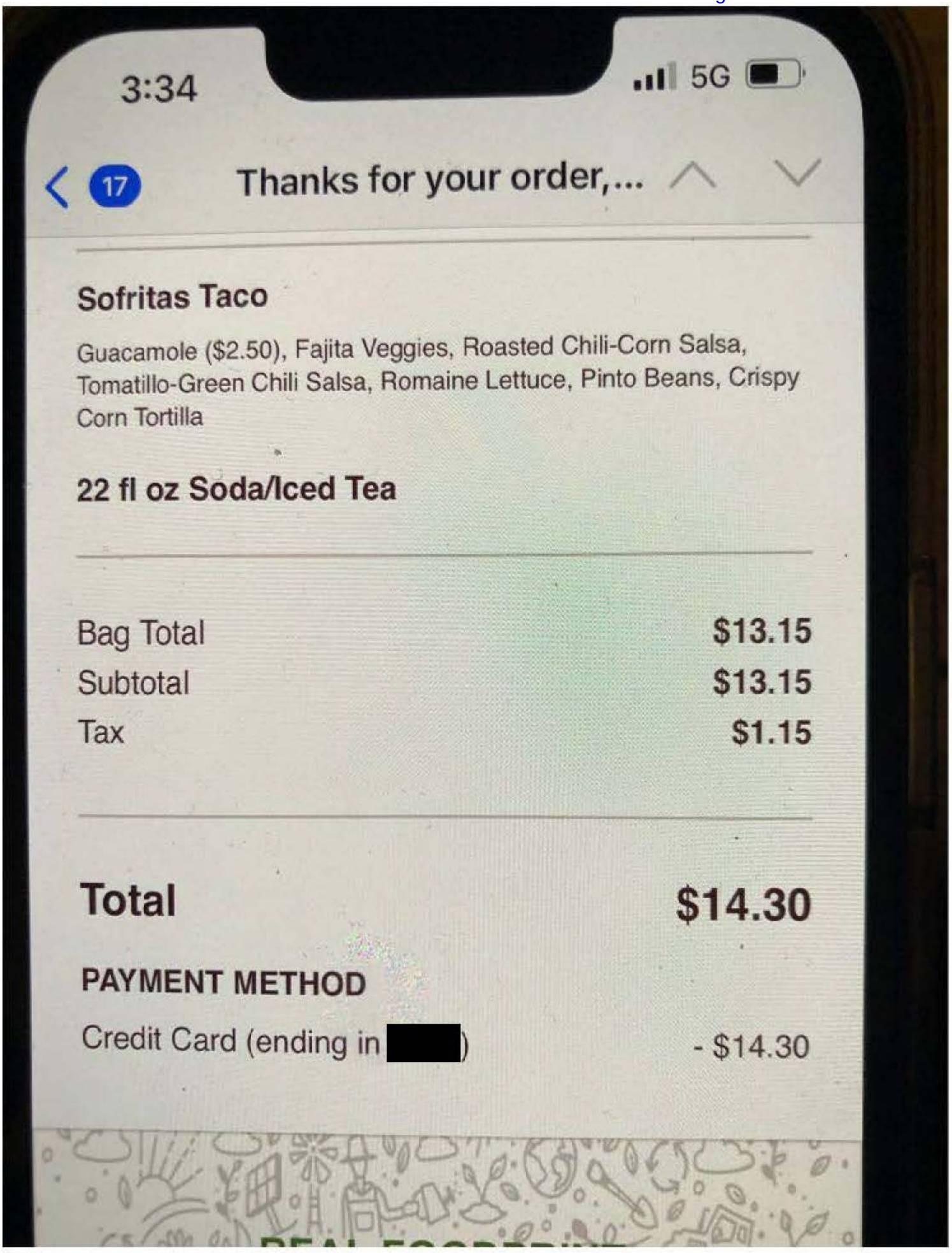
264484 Wade

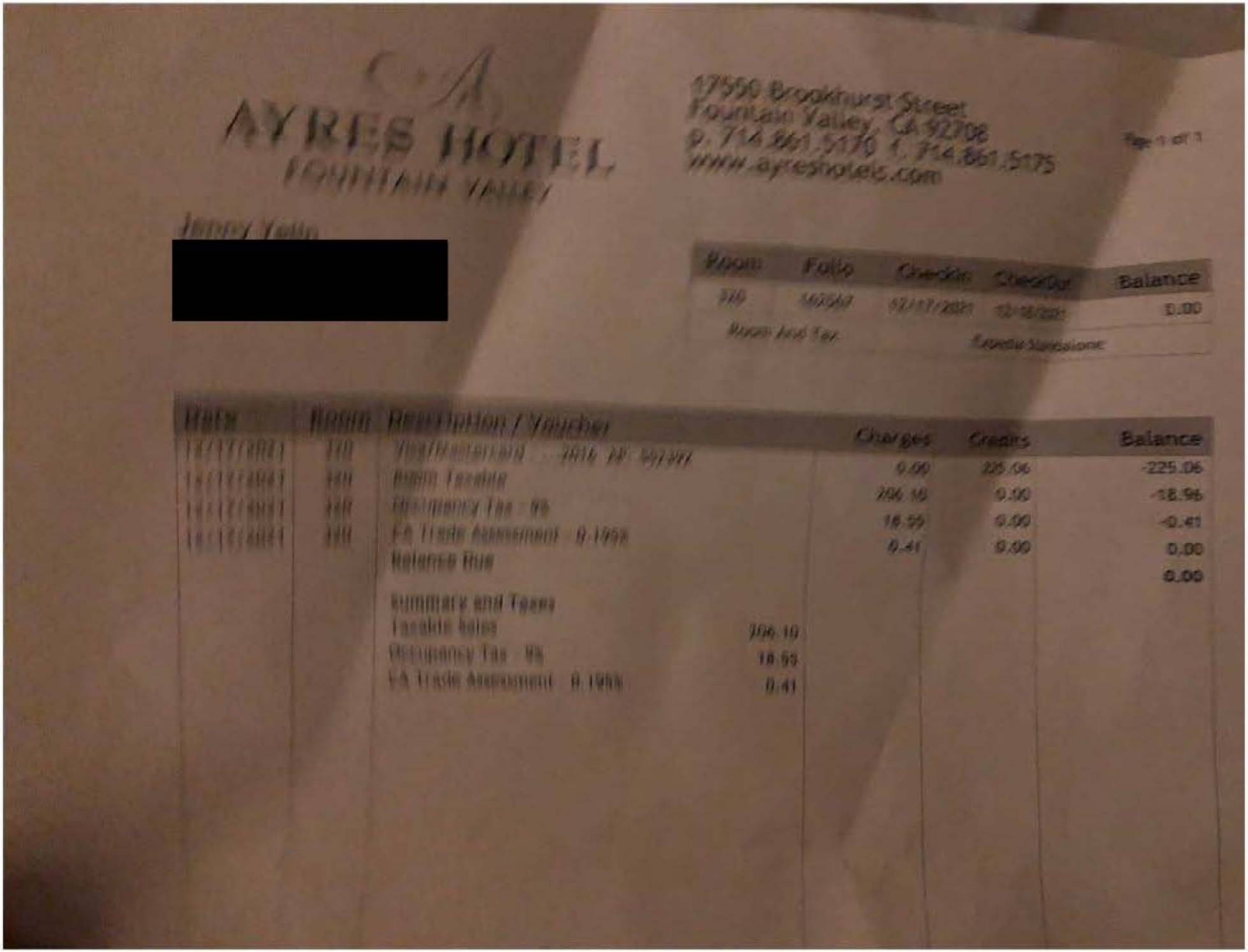
CHK 3260
DEC17'21 10:29AM

TO GO

040822011969
1 HUMMUS SBRA RED 5.99
Hummus Sabra Red Pepper W
Pretzel
021908812359
1 CHP FSTG SWT 1.5 2.52
Food Should Taste Good
Sweet Potato Chips 1.5
013971021004
1 CHP BARE APL 5.49
Bare Fuji&Reds Apple Chips
3.4oz
859686004006
1 BRKTHN DC ALMD 7.99
Bark Thins Dark Choc Almond
With Sea Salt 6oz
850397004132
1 BAR TI APL BLBRY 2.99
That's It Fruitbar Apple &
Blueberries 1.2oz

SUBTOTAL 24.98
TAX 1.94
AMOUNT PAID 26.92
AT231002 XXX[redacted]


3:34
5G
17
Thanks for your order,...
Sofritas Taco
Guacamole ($2.50), Fajita Veggies, Roasted Chili-Corn Salsa, Tomatillo-Green Chili Salsa, Romaine Lettuce, Pinto Beans, Crispy Corn Tortilla
22 fl oz Soda/Iced Tea
Bag Total $13.15
Subtotal $13.15
Tax $1.15
Total $14.30
PAYMENT METHOD
Credit Card (ending in [redacted]) - $14.30



C/A

AYRES HOTEL
FOUNTAIN VALLEY

17550 Brookhurst Street
Fountain Valley, CA 92708
P: 714.861.5170 F: 714.861.5175
www.ayreshotels.com

[redacted]

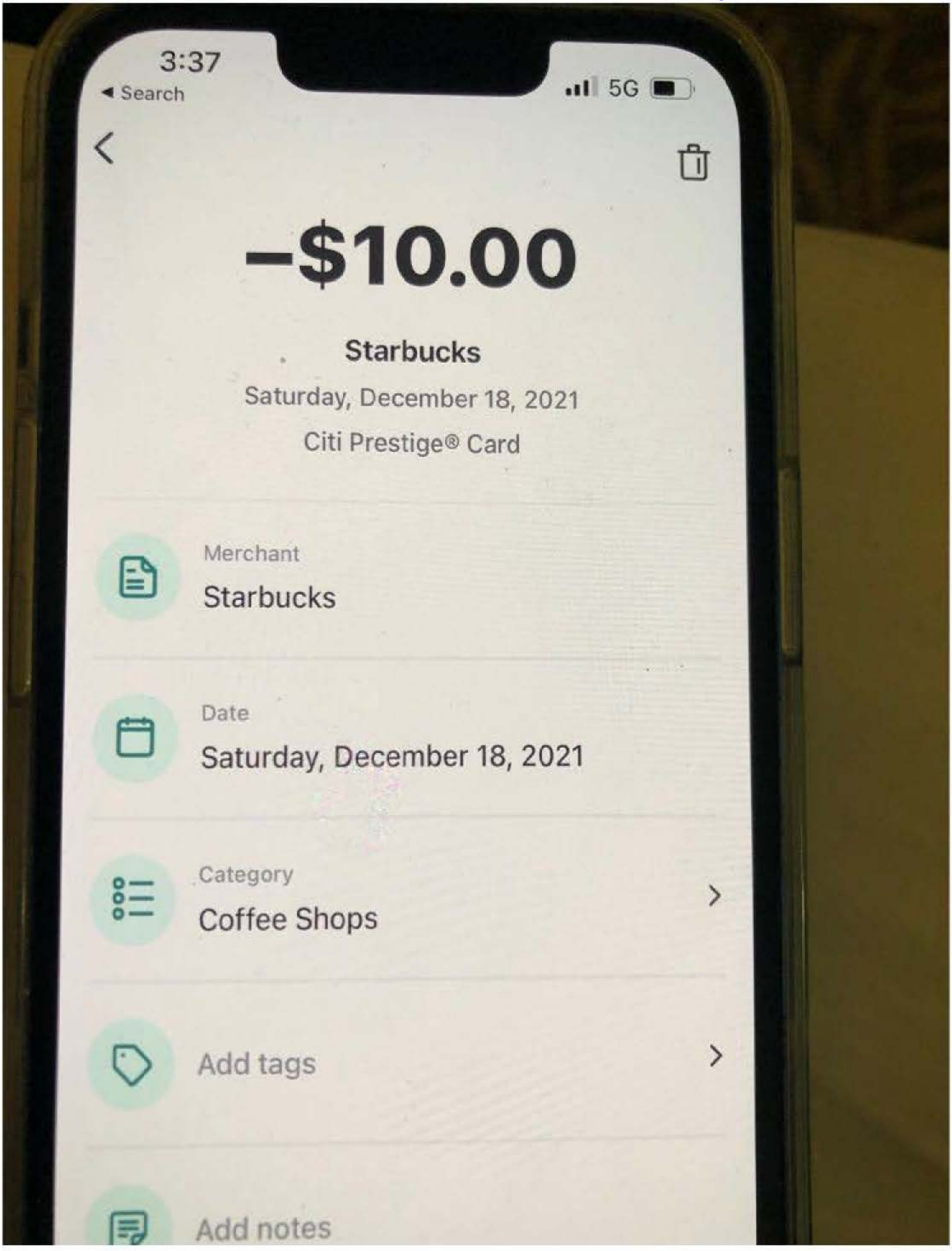
Room	Folio	Check-In	Check-Out	Balance
310	160567	07/17/2025	07/18/2025	0.00

Room And Tax — Expedia Statement

Date	Room	Description / Voucher	Charges	Credits	Balance
07/17/2025	310	Visa/Mastercard ... 3016 AP: 497201	0.00	225.06	-225.06
07/17/2025	310	Room Taxable	196.10	0.00	-18.96
07/17/2025	310	Occupancy Tax - 9%	18.55	0.00	-0.41
07/17/2025	310	CA Trade Assessment - 0.195%	0.41	0.00	0.00
		Balance Due			0.00

Summary and Taxes

Taxable Sales	196.10
Occupancy Tax - 9%	18.55
CA Trade Assessment - 0.195%	0.41


3:37
Search
5G
−$10.00
Starbucks
Saturday, December 18, 2021
Citi Prestige® Card
Merchant
Starbucks
Date
Saturday, December 18, 2021
Category
Coffee Shops
Add tags
Add notes

DönerG

THURKISH & MEDITERRANEAN GRILL

DonerG
@
The Hangar
4150 McGowen Space #3
Long Beach, CA 90808
(562)420-4832

Server: Sean J
Check #121
Ordered: 1/9/22 6:51 PM

Pita Sandwich	$9.75
Doner Kebab Salad Plate	$12.75
French Fries	$4.50
Subtotal	$27.00
Tax	$2.77
Tip	$4.86
Total	$34.63

Input Type	C (EMV Chip Read)
VISA CREDIT	xxxxxxx[redacted]
Time	6:51 PM
Transaction Type	Sale
Authorization	Approved
Approval Code	03481C
Payment ID	njKRcHNgRhxX
Application ID	A0000000031010
Application Label	VISA CREDIT
Terminal ID	7f075dac5eb0ca18
Card Reader	BBPOS

AMY XU

The Flame Broiler

3821 N. Lakewood Blvd #102
Long Beach, CA 90808
Phone 562-425-8100

1/10/2022 6:17:12 PM
Order Id: AACBLKKLAECU
#95 - Take Out
Employee: Margarita

1 Regular Chicken	$8.50
Brown Rice	$0.00
Veggies	$0.00
Less Rice	$0.00
Onions	$0.00
1 Seaweed	$1.10
1 Kimchi	$2.75
Sub Total	$12.35
Sales Tax	$1.27
Order Total	$13.62
Visa	$13.62
AUTHORIZED AMOUNT	$13.62

Card#: **********[redacted]
Authorization: 01339C

--> Order Closed <--

Thank You!

OPERATED BY
HMS HOST

W PIZZA
LAX INTERNATIONAL AIRPORT

441998 Christia

CHK 5749
49
JAN11'22 7:29PM

TO GO

1 PIZ FENNEL SSG	16.49
AT08087C XXX9793	
VISA CC	18.06
SUBTOTAL	16.49
TAX	1.57
AMOUNT PAID	18.06

--441998 Closed JAN11 07:30PM---

WE WANT TO HEAR YOUR FEEDBACK!
PLEASE CONTACT 1-877-672-7467
OR CUSTOMERSERVICE@HMSHOST.COM
TO SHARE YOUR EXPERIENCE.

STOREID: LAXWPA01

Bite Mi - Long Beach Exchange
4150 McGowen St. #5
Long Beach, CA 90808
562-420-4884

To Go

Ab

Server: Randy L
Check #72 Ab
Ordered: 1/11/22 12:46 PM

Crispy Tofu	$7.50
EXTRA Veggies	
Spicy Garlic Noodles - Chicken	$10.00
Black Tea Lemonade	$4.00
House Special Coffee	$4.00
75% Sweet	
Subtotal	$25.50
Tax	$2.62
Tip	$4.59
Total	$32.71

Input Type	C (EMV Chip Read)
VISA CREDIT	xxxxxxxx[redacted]
Time	12:46 PM
Transaction Type	Sale
Authorization	Approved
Approval Code	09442C
Payment ID	mqXtjgpbCXCH
Application ID	A0000000031010
Application Label	VISA CREDIT
Terminal ID	330464f0bf4017fd
Card Reader	BBPOS

AMY XU

Suggested Additional Tip:

I Luv Sushi
3215 Carson St
Lakewood, CA 90712
(562) 421-8917

Date : 01/10/2022, 12:29 PM
Check# : 4
Card Type : VISA
Card # : xxxx xxxx xxxx[redacted]
Card Holder : XU/AMY
Card Entry : Chip
Trans Type : SALE
Transaction # : 1
Ref. Number :
Auth Code : 07559C
Server : Mae

Amount : **$35.17**

Gratuity: _____

Total: _____

I AGREE TO PAY ABOVE TOTAL AMOUNT
ACCORDING TO CARD ISSUER
AGREEMENT!

X_____
SIGNATURE

APP LABEL : VISA CREDIT
AID : A0000000031010
ATC : 00D6
TC : 53EA6B928512D6CB

DUPLICATE RECEIPT

Starbucks Coffee #19665
3821 Lakewood Blvd
Long Beach, CA XXX-XXX-XXXX

CHK 594203
01/11/2022 07:49 AM
XXX2850 Drawer: 1 Reg: 3

Drive Thru
Order

Spinach Feta Wrap	4.75
Gr Americano	3.45
1 pump Sf Vanilla	0.80
Oatmilk 1/2"	
Gr Latte	4.45
Almond Milk	0.70
Banana	1.25
Subtotal	$15.40
Total	$15.40
Change Due	$0.00

Payments

Visa 15.40
XXXXXXXXXXXX[redacted]
Card Entry: CHIP
Trans Type: SALE
App Label: CHASE VISA
Auth: 07825C
AID: A0000000031010
TVR: 0000008000
TSI: E800

---------- Check Closed ----------
01/11/2022 07:49 AM

COURTYARD®
BY MARRIOTT

Courtyard by Marriott® Long Beach Airport
3841 N. Lakewood Blvd, Long Beach, CA 90808 P 562.429.5803
Marriott.com/LGBCL

A. Xu

Room: 434
Room Type: GENR
Number of Guests: 1
Rate: $219.00
Clerk:

Arrive: 09Jan22 Time: 09:09PM Depart: 11Jan22 Time: 12:00PM Folio Number: 50724

DATE	DESCRIPTION	CHARGES	CREDITS
09Jan22	Room Rate	189.00	
09Jan22	Convention & Tourism Fee	0.38	
09Jan22	Occupancy Sales Tax	24.62	
09Jan22	City Tax	5.68	
10Jan22	Room Rate	219.00	
10Jan22	Convention & Tourism Fee	0.44	
10Jan22	Occupancy Sales Tax	28.53	
10Jan22	City Tax	6.58	
11Jan22	Visa		474.23
	Card #: VIXXXXXXXXXXXX[redacted]XXXX		
	Amount: 474.23 Auth: 07925C		
	This card was electronically swiped on 09Jan22		

BALANCE: 0.00

As a Marriott Bonvoy Member, you could have earned points towards your free dream vacation today. Start earning points and Elite status, plus enjoy exclusive member offers. Enroll today at the front desk.

See our "Privacy & Cookie Statement" on Marriott.com.

JANUARY 9

OAK ✈ LGB

Oakland to Long Beach

Confirmation # **4DO6TK**

Confirmation date: 01/05/2022

PASSENGER	**Amy Xu**
RAPID REWARDS #	Join or Log in
TICKET #	5261467323491
EXPIRATION[1]	January 5, 2023
EST. POINTS EARNED	1,874

Rapid Rewards® points are only estimations.

Your itinerary

Flight: Sunday, 01/09/2022 Est. Travel Time: **1h 25m** Anytime

FLIGHT # 0369	DEPARTS		ARRIVES
	OAK 05:00PM	✈	**LGB 06:25PM**
	Oakland		Long Beach

Payment information

Total cost

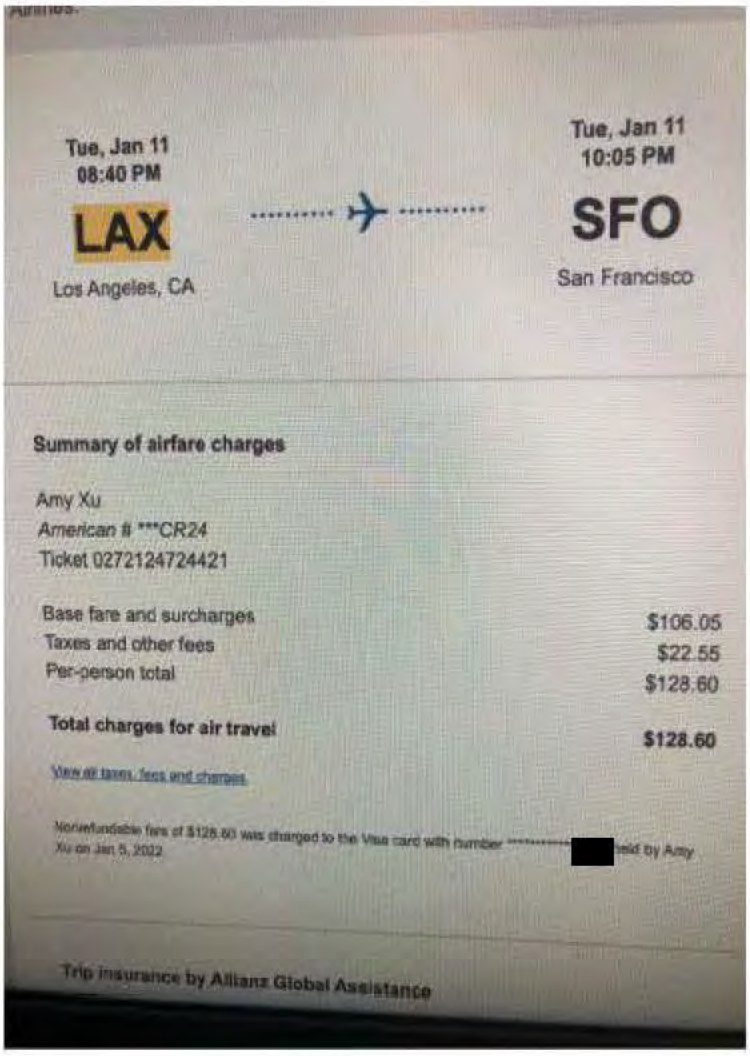
Air - 4DO6TK

Base Fare	$	187.33
U.S. Transportation Tax	$	14.05
U.S. 9/11 Security Fee	$	5.60
U.S. Flight Segment Tax	$	4.50
U.S. Passenger Facility Chg	$	4.50
Total	**$**	**215.98**

Payment

Visa ending in [redacted]
Date: January 5, 2022
Payment Amount: $215.98

Fare Rules: If you decide to make a change to your current itinerary it may result in a fare increase. In the case of a Full R



Tue, Jan 11
08:40 PM

LAX

Los Angeles, CA

Tue, Jan 11
10:05 PM

SFO

San Francisco

Summary of airfare charges

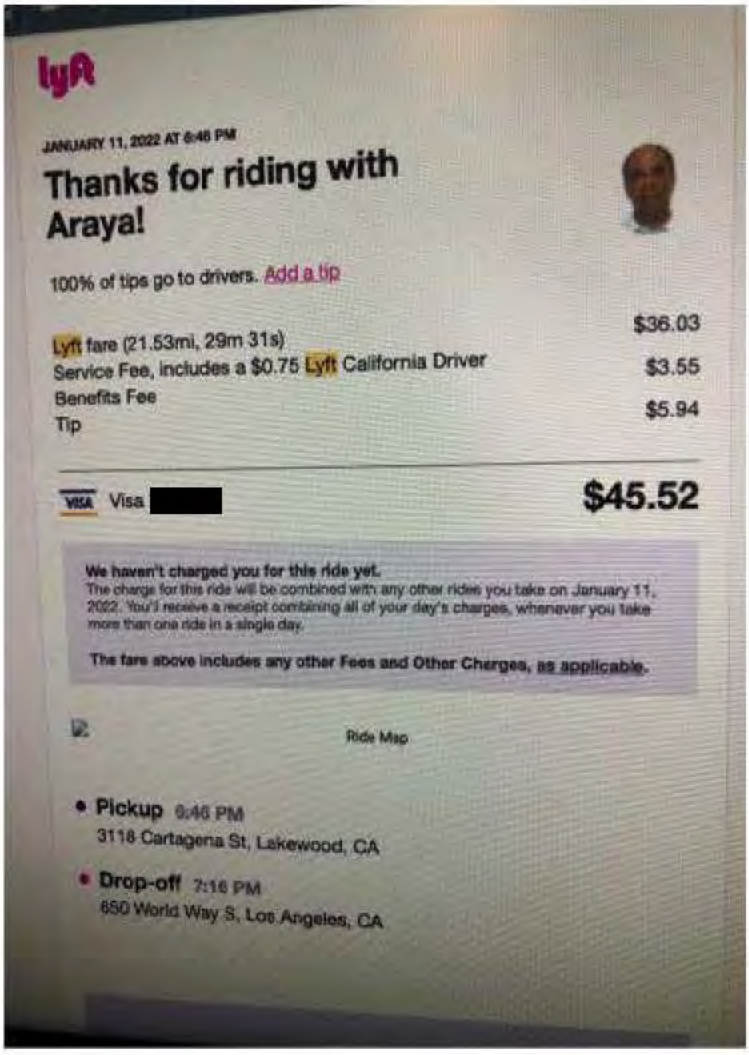
Amy Xu
American # ***CR24
Ticket 0272124724421

Base fare and surcharges	$106.05
Taxes and other fees	$22.55
Per-person total	$128.60
Total charges for air travel	**$128.60**

View all taxes, fees and charges

Nonrefundable fare of $128.60 was charged to the Visa card with number ********[redacted] paid by Amy Xu on Jan 5, 2022

Trip insurance by Allianz Global Assistance



JANUARY 11, 2022 AT 6:46 PM

Thanks for riding with Araya!

100% of tips go to drivers. Add a tip

Lyft fare (21.53mi, 29m 31s)	$36.03
Service Fee, includes a $0.75 Lyft California Driver Benefits Fee	$3.55
Tip	$5.94

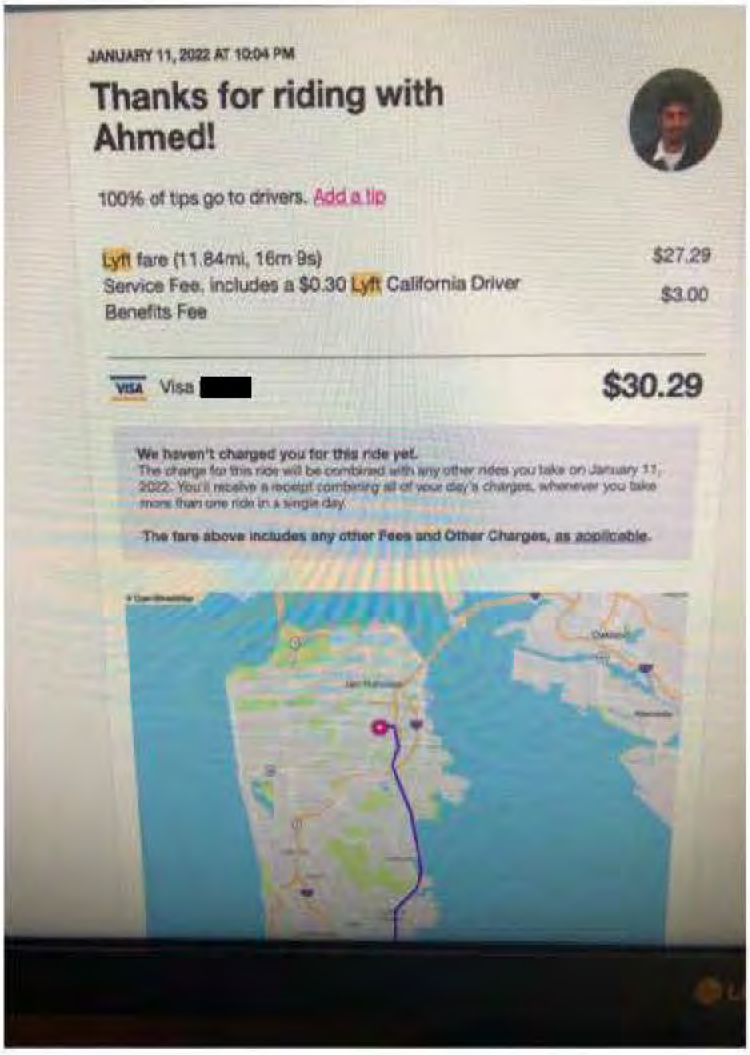
Visa [redacted] **$45.52**

We haven't charged you for this ride yet.
The charge for this ride will be combined with any other rides you take on January 11, 2022. You'll receive a receipt combining all of your day's charges, whenever you take more than one ride in a single day.

The fare above includes any other Fees and Other Charges, as applicable.

Ride Map

- **Pickup** 6:46 PM
  3118 Cartagena St, Lakewood, CA
- **Drop-off** 7:16 PM
  650 World Way S, Los Angeles, CA



JANUARY 11, 2022 AT 10:04 PM

Thanks for riding with Ahmed!

100% of tips go to drivers. Add a tip

Lyft fare (11.84mi, 16m 9s)	$27.29
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee	$3.00

VISA Visa [redacted] **$30.29**

We haven't charged you for this ride yet.
The charge for this ride will be combined with any other rides you take on January 11, 2022. You'll receive a receipt combining all of your day's charges, whenever you take more than one ride in a single day.

The fare above includes any other Fees and Other Charges, as applicable.

Ben Bien-Kahn

From: Philz Coffee via Square <receipts@messaging.squareup.com>
Sent: Thursday, January 13, 2022 8:42 AM
To: Ben Bien-Kahn
Subject: Receipt from Philz Coffee

[EXTERNAL] Notice: This message comes from an external sender.

Philz Coffee

Let Philz Coffee know how your experience was

$12.78

Tantalizing Turkish (Medium)	$4.70
+ Hot	
+ Light Cream	
Breakfast Foods (Turkey Sausage Sandwich)	$5.95
Purchase Subtotal	$10.65
Tip	$2.13
Total	$12.78

Got a sec? Let's connect.
Telithebell.com

Survey Code: 5601-1037-1253-3415

Taco Bell 030751
233 Mount Herman Rd
Scotts Valley, CA 95066
(831)440-9455

1/13/2022 3:44:14 PM
Order 342488 Cashier: Alma H

1 Crunchwrap Combo	7.79
Crunchwrap Supreme	0.00
Beef Crunchy Taco	0.00
Lrg Root Beer	0.00
1 Hot Sauce	0.00
SubTotal	7.79
Tax	0.76
Total	8.55
Cash	10.00
Change	1.45

Order Number 488

Total Items in Order: 3

Start earning FREE rewards now.

Download the Taco Bell App &
Scan the barcode below to get your points.
Terms and exclusions apply

106288202040

$500 CASH GIVEAWAY ON BACK

Ben Bien-Kahn

From: Upserve Receipts <support-malone-s-grill@upserve.com>
Sent: Thursday, January 13, 2022 5:43 PM
To: Ben Bien-Kahn
Subject: Receipt from Malone's Grille

[EXTERNAL] Notice: This message comes from an external sender.

Your requested receipt is below, thank you for visiting Malone's Grille

Malone's Grille

Check #: 3916
Server: Jennie G
TABLE: #18

1/13/22
5:40 PM
Guest Count: 1

1 11 Inchaton beer IIIPA 8.00
1 Apocalypse Burger 17.00

Sub-total 25.00
Sales Tax 2.44
TOTAL 27.44

PAYMENTS
CC Payment 27.44
VISA XXXXXXXXXXXX[redacted]
AID: A0000000031010
Application Label: VISA CREDIT
AUTH: 046320

Tips 5.00

TOTAL PAYMENTS 27.44
TOTAL TIPS 5.00
Balance Due 0.00

Thank You!
malonesgrille.com

Sent:
To: Ben Bien Kahn
Subject: Receipt from White Raven Coffee House

[EXTERNAL] Notice: This message comes from an external sender.

Square automatically sends receipts to the email address you used at any Square seller. Learn more

White Raven Coffee House

Let White Raven Coffee House know how your experience was

$7.50

House Coffee (Medium (16oz))	$2.50
Pastries $3.00	$3.00
Purchase Subtotal	$5.50
Tip	$2.00
Total	$7.50

White Raven Coffee House

Wild Roots Market Felton

9240 Highway 9
Felton, CA 95018

831-335-7322

1/14/22 2:16 PM Register #: 251843
Clerk: Emma Peacock Store: 8
Terminal: 01

5675222215548	HI MOROCCAN MINT	1.39 T
	10% Discount	-0.20
00435	BLUEBERRY COBBLEDUZ	2.04 T
	0.77 lb @ $11.99/lb	
	10% Discount	-0.21
00127	ARTICHOKE GREEK QUICHE	6.99 T
	10% Discount	-0.70
00434	SANDWICH $6.99	6.99 T
	10% Discount	-0.69
40009	$.05 ORG	0.05 T
	SUBTOTAL	15.05
	TOTAL	15.05
	Cash: 1100	15.05
	TOTAL TENDERED	15.05
	Change	0.00

Customer: Patricia Livingston
Account: 4810400012070

CARD INFORMATION

Name: BIEN-AIMA/BENJAMIN
Card type: Visa
Account: [redacted]
Amount: USD $15.05
Approval #: 05000
Date: 1/14/22
Reference #: 000281000000
MID: ***272
Mode: Online
Card Name: VISA CREDIT
AID: A0000000031010

Hilton
HOTELS & RESORTS

BIEN-KAHN, BENJAMIN
[redacted]
UNITED STATES OF AMERICA

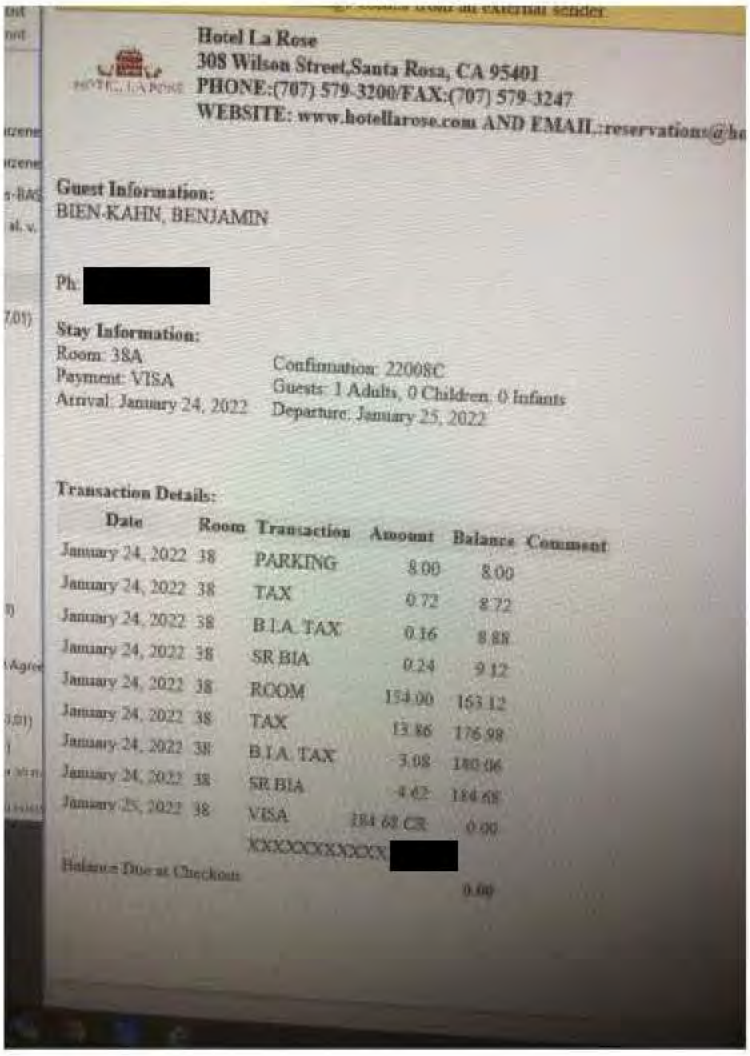
Room No: 331R1
Arrival Date: 1/13/2022 4:07:00 PM
Departure Date: 1/15/2022 11:24:00 AM
Adult/Child: 1/0
Cashier ID: MR LLLER19
Room Rate:
AL:
HH #
VAT #
Folio No/Chk: 574548 A

Confirmation Number: 5222661897

SANTA CRUZ/SCOTTS VALLEY 1/13/2022 4:00:00 PM

DATE	REF NO	DESCRIPTION	CHARGES
1/13/2022	2726378	GUEST ROOM	$149.00
1/13/2022	2726378	RM - OCCUPANCY TAX	$13.40
1/13/2022	2726378	RM - SC COUNTY ASSESSMENT	$3.30
1/15/2022	2726378	CA TOURISM ASSESSMENT	$0.43
1/14/2022	2726518	VS *3772	($166.03)
		BALANCE	$0.00

I hope you enjoyed your stay at Hilton Santa Cruz. For any reason you are unsatisfied, I would appreciate feedback so I can address concerns immediately. You may reach me at Ashley.Vincent2@Hilton.com



Hotel La Rose
308 Wilson Street,Santa Rosa, CA 95401
PHONE:(707) 579-3200/FAX:(707) 579-3247
WEBSITE: www.hotellarose.com AND EMAIL:reservations@h

Guest Information:
BIEN-KAHN, BENJAMIN

Ph: [redacted]

Stay Information:
Room: 38A
Payment: VISA
Arrival: January 24, 2022
Confirmation: 22008C
Guests: 1 Adults, 0 Children, 0 Infants
Departure: January 25, 2022

Transaction Details:

Date	Room	Transaction	Amount	Balance	Comment
January 24, 2022	38	PARKING	8.00	8.00	
January 24, 2022	38	TAX	0.72	8.72	
January 24, 2022	38	B.I.A. TAX	0.16	8.88	
January 24, 2022	38	SR BIA	0.24	9.12	
January 24, 2022	38	ROOM	154.00	163.12	
January 24, 2022	38	TAX	13.86	176.98	
January 24, 2022	38	B.I.A. TAX	3.08	180.06	
January 24, 2022	38	SR BIA	4.62	184.68	
January 25, 2022	38	VISA	184.68 CR	0.00	
		XXXXXXXXXXXX[redacted]			

Balance Due at Checkout 0.00

McDonald's Restaurant #1561
600 REDWOOD HWY
CA
MARIN
MILL VALLEY,CA 94941-3071
TEL# 415-3530184

01/24/2022 08:31 AM
KS# 13 Order 11
Side1

1 Sau Egg Bisc M1-Hb 8.79
1 M Premium Roast

Subtotal 8.79
Tax 0.73
Take-Out Total 9.52

Cashless 9.52
Change 0.00

MER# 177649
CARD ISSUER ACCOUNT#
Visa SALE **********[redacted]
TRANSACTION AMOUNT 9.52
CONTACTLESS
AUTHORIZATION CODE - 121561
SEQ# 005219
AID: A0000000031010

Now hiring
Apply online at:
www.mcdonalds.com/careers

El Coqui Puerto Rican Cuisine
400 Mendocino Ave
Santa Rosa, CA 707-542-8868
ph 707-542-8868

Thank You for Visiting

TABLE: Table 4 - 1 Guest
Your Server was Miriam
1/24/2022 1:04:40 PM
Sequence #: 0000007
ID #: 0339018

Subtotal	$37.20
Total Taxes	$3.44
Grand Total	$40.64

Credit Purchase

Name	:BIEN-KAHN/BENJAMIN
CC Type	:VISA
CC Num	:xxxx xxxx xxxx [redacted]
Reference	:480396
Approval	:03320I
Server	:Miriam
Ticket Name	:Table 4

Payment Amount: $40.64

Tip: 8.13

Total: 48.77

Chevys
FRESH MEX

Cantina #2018
24 Fourth Street
Santa Rosa, CA 95401
(707) 571-1082

Date: Jan24'22 07:00PM
Card Type: CC Charge
Acct #: XXXXXXXXXXXX3772
Card Entry: SWIPED
Trans Type: PURCHASE
Auth Code: 08031I
Check: [redacted]
Table: 402/1
Server: 41 Jeffrey
Reference: 3007061335

Subtotal: 22.67
TIP 4.40
TOTAL 29.07

Signature

I agree to pay above total

A'Roma Roasters

95 5th Street Railroad Square
Santa Rosa
California 95401
707-576-7765
aromaroasters.com

Check-No:	1-052
Open Date:	25-Jan-2022
Open Time:	07:48AM
Customer:	Walkin
Service:	Store To Go

ORDER SUMMARY

ITEM	PRICE	QTY	AMOUNT
*Coffee To Go 20OZ	3.50	1	3.50
Scone	3.00	1	3.00

Sub-Total:	$ 6.50
Total-TAX:	$ 0.28
CHECK TOTAL:	$ 6.78
TOTAL:	$ 6.78
EMV/ CC :	$ 6.78

Have a nice day. Visit us again!

El Coqui Puerto Rican Cuisine
400 Mendocino Ave
Santa Rosa, CA 707-542-8868
ph 707-542-8869

Thank You for Visiting

TABLE: Table 1 - 1 Guest
Your Server was Miriam
1/25/2022 2:21:24 PM
Sequence #: 0000019
ID #: 0339067

Subtotal	$37.20
Total Taxes	$3.44
Grand Total	$40.64

Credit Purchase

Name	:BIEN-KAHN/BENJAMIN
CC Type	:VISA
CC Num	:XXXX XXXX XXXX [redacted]
Reference	:480818
Approval	:04119I
Server	:Miriam
Ticket Name	:Table 1

Payment Amount: $40.64
Tip: 9.00
Total: 49.64

X

15% $6.10 20% $8.13 25%

FLIGHT # 0301	DEPARTS		ARRIVES
	ONT 05:30PM	✈	OAK 06:45PM
	Ontario		Oakland

Payment information

Total cost

Air - 4HG9N2

Base Fare	$	330.94
U.S. Transportation Tax	$	24.82
U.S. 9/11 Security Fee	$	11.20
U.S. Passenger Facility Chg	$	9.00
U.S. Flight Segment Tax	$	9.00
Total	**$**	**384.96**

Payment

Mastercard ending in [redacted]
Date: April 11, 2022

Payment Amount: $43.00

Credit from ticket: #5262105143338 to #5262106267730
Date: April 8, 2022

Fare rules: If you decide to make a change to your current itinerary it may result in a fare increase.

Your ticket number: 5262106267730

lyft

APRIL 11, 2022 AT 6:45 AM

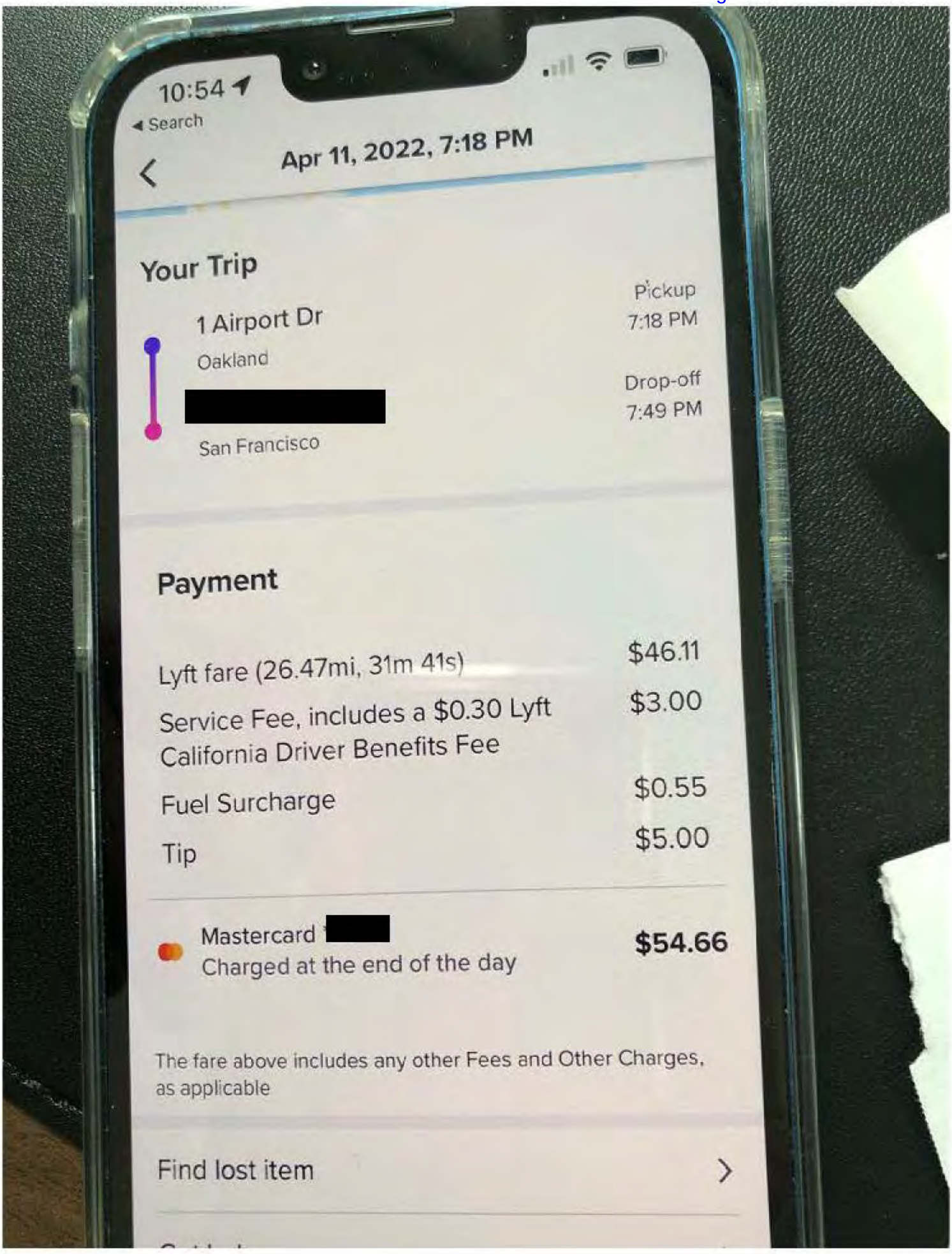
Thanks for riding with Zaid!

100% of tips go to drivers. Add a tip

Lyft fare (26.17mi, 36m 19s)	$56.59
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee	$3.00
Fuel Surcharge	$0.55
SF Rideshare Tax	$0.81
Tip	$7.00

MasterCard [redacted]

$67.95


10:54
Search
Apr 11, 2022, 7:18 PM
Your Trip
1 Airport Dr
Oakland
[redacted]
San Francisco
Pickup
7:18 PM
Drop-off
7:49 PM
Payment
Lyft fare (26.47mi, 31m 41s) $46.11
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee $3.00
Fuel Surcharge $0.55
Tip $5.00
Mastercard [redacted]
Charged at the end of the day
$54.66
The fare above includes any other Fees and Other Charges, as applicable
Find lost item

243

FARLEY'S

Farleys
1 Airport Dr
Oakland, CA 94621

Server: Norma Z
Check #243
Guest Count: 1
Ordered:

4/11/22 7:56 AM

1 Farley's Yogurt Parfait	$[illegible].50
1 Wild Berry Muffin	$4.[illegible]
1 12oz Drip Coffee Medium	$3.85
EE Surcharge (5.00%)	$0.92
Subtotal	$19.22
Tax	$1.88
Tip	$2.74
Total	$23.84

Input Type	C (EMV Chip Read)
Mastercard	XXXXXXXX[redacted]
Transaction Type	Sale
Authorization	Approved
Approval Code	24173Z
Payment ID	gqnPKWpcbpWN
Application ID	A0000000041010
Application Label	Mastercard
Terminal ID	7ae5a7ba68f1dc7f
Card Reader	BBPOS

JENNY S YE[illegible]N

Starbucks Coffee #53804
Address
Ontario, CA

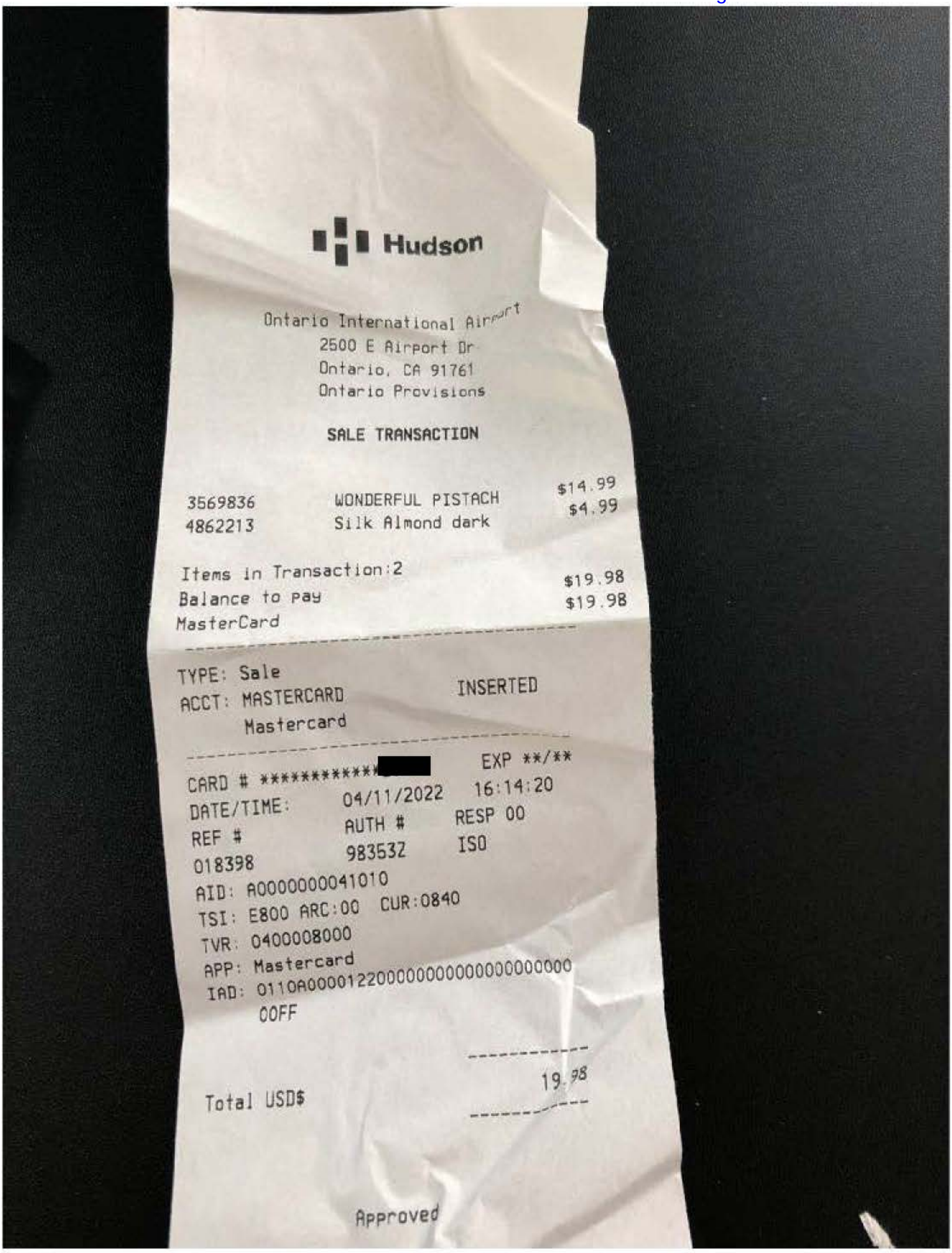
CHK 715904
04/11/2022 11:27 AM
XXX1297 Drawer: 1 Reg: 1

Order

Rspbr Sprk Wtr 355	2.45
Bottle Dep/Crv	0.05
Butter Popcorn	1.50
Cheese & Fruit Box	6.25
Sh Cappuccino	3.65
Subtotal	$13.90
Total	$13.90
Change Due	**$0.00**

Payments

Mastercard 13.90
XXXXXXXXXXXX[redacted]
Card Entry: QUICK CHIP
Trans Type: PURCHASE
Reference: 00000052
App Label: Mastercard
Auth: 512302
AID: A0000000041010
TVR: 0000008000
TSI: E800



Hudson

Ontario International Airport
2500 E Airport Dr
Ontario, CA 91761
Ontario Provisions

SALE TRANSACTION

3569836	WONDERFUL PISTACH	$14.99
4862213	Silk Almond dark	$4.99

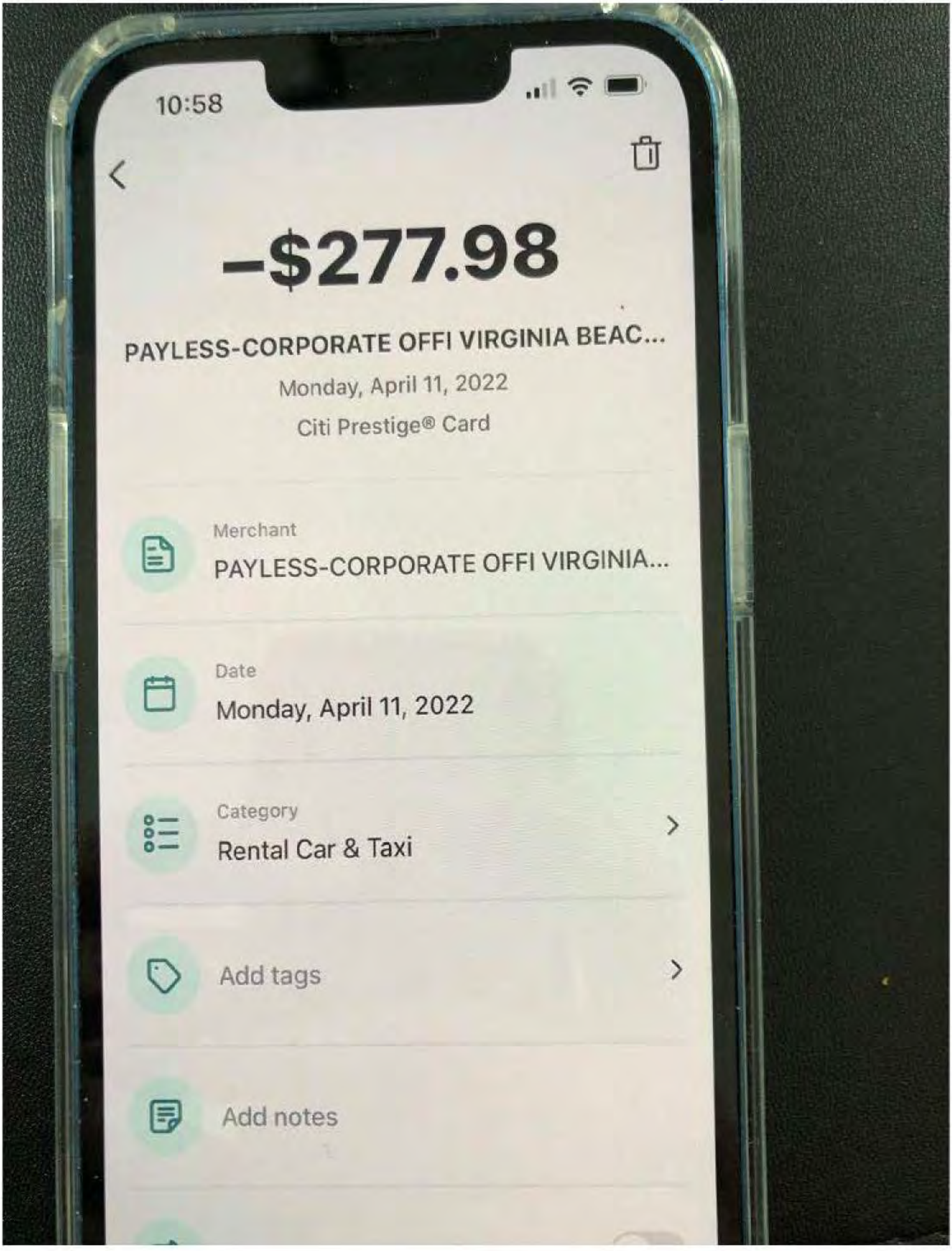
Items in Transaction:2 $19.98
Balance to pay $19.98
MasterCard

TYPE: Sale
ACCT: MASTERCARD INSERTED
Mastercard

CARD # **********[redacted] EXP **/**
DATE/TIME: 04/11/2022 16:14:20
REF # AUTH # RESP 00
018398 983532 ISO
AID: A0000000041010
TSI: E800 ARC:00 CUR:0840
TVR: 0400008000
APP: Mastercard
IAD: 0110A00001220000000000000000000
00FF

Total USD$ 19.98

Approved


10:58
-$277.98
PAYLESS-CORPORATE OFFI VIRGINIA BEAC...
Monday, April 11, 2022
Citi Prestige® Card
Merchant
PAYLESS-CORPORATE OFFI VIRGINIA...
Date
Monday, April 11, 2022
Category
Rental Car & Taxi
Add tags
Add notes

FLIGHT # 1364 DEPARTS OAK 06:40PM ARRIVES ONT 08:00PM

Flight 2: Friday, 04/29/2022 Est. Travel Time: 1h 15m Amenities

FLIGHT # 4024 DEPARTS ONT 01:30PM ARRIVES OAK 02:45PM

Payment information

Total cost

Air - 24Y8IF

Base Fare	$	500.24
U.S. Transportation Tax	$	37.52
U.S. 9/11 Security Fee	$	11.20
U.S. Flight Segment Tax	$	9.00
U.S. Passenger Facility Chg	$	9.00
EarlyBird	$	20.00
Total	$	586.96

Payment

Visa ending in [redacted]
Date: April 27, 2022
Payment Amount: $566.96

Visa ending in [redacted]
Date: April 27, 2022
Payment Amount: $20.00

Prepare for takeoff

Use our app to make changes to your trip, get a boarding pass, & more.

24 hours before your departure

Check-in on Southwest.com® or using the Southwest Mobile App. Use your mobile device and receive a mobile boarding pass.

30 minutes before your departure

Expedia

Receipt for Itinerary #72294029131897

Apr 28, 2022 - Apr 29, 2022

Booked Items

Hotel: Holiday Inn Ontario Airport, an IHG Hotel

2155 E. Convention Center Way, Ontario, CA91764

Check-in: 4/28/2022 | Check-out: 4/29/2022, 1 room 1 night

Hotel Booking Protection

Coverage Dates: 4/28/22 - 4/29/22

Traveler Information

Benjamin Bien-Kahn

Room 1: Standard Room, 1 King Bed (LEISURE)

Cost Summary

Booked Date: Apr 27, 2022

Room Price	**$203.96**
1 night	$179.00
Taxes & Fees	$24.96
Travel Protection	$9.18

Total: **$213.14**
Collected by Expedia

Paid: **$213.14**
[Visa 3772]
All prices quoted in USD

OK
AUTOLOAD
FARE $ 11.00
BAL $ 14.40

CAB FARE RECEIPT
AMOUNT $20.00 DATE 4/28/22
FROM Ontario Airport
TO Holiday Inn | Ontario Airport
CAB No. DRIVER

Hudson

Operated by Hudson
Oakland International Airport
1 Airport Dr.
Oakland, CA 94621

SALE TRANSACTION

4647670	DORITOS NACHO CHE	$2.99
2568195	SPRITE 20oz	$3.99
CONTAINER DEPOSIT		$0.05
	Bev Tax $3.99 @ 5.0125%	$0.2
0	SALES TAX $4.19 @ 10.25%	$0.42
Total CONTAINER DEPOSIT		$0.05
Items in Transaction:2		
Balance to pay		$7.65
VISA		$7.65

TYPE: Sale
ACCT: VISA INSERTED
CHASE VISA

CARD # ************0772 EXP **/**
DATE/TIME: 04/28/2022 21:04:02
REF # AUTH # RESP 00
022941 ISO

FREE OFFER ON BACK!!
Wendy's Restaurant #00009413
1890 East G Street
Ontario, CA 91764
909-390-1180

4

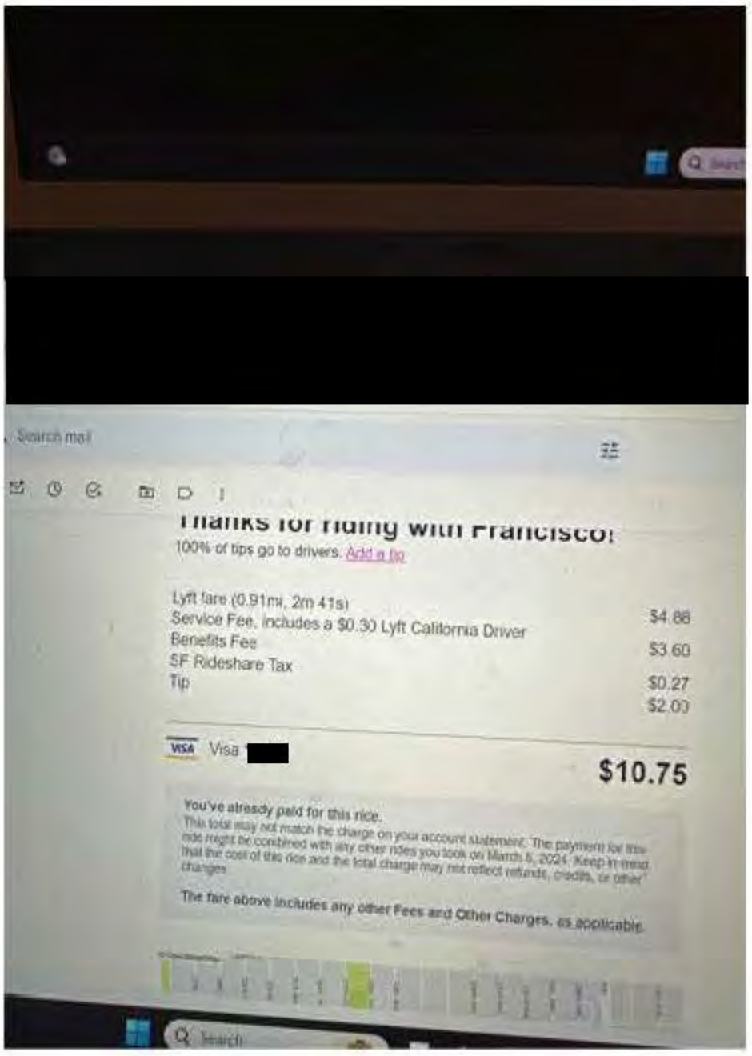
Host: Florencio 04/28/2022
4 9:06 PM
10059

Order Type: DINE IN

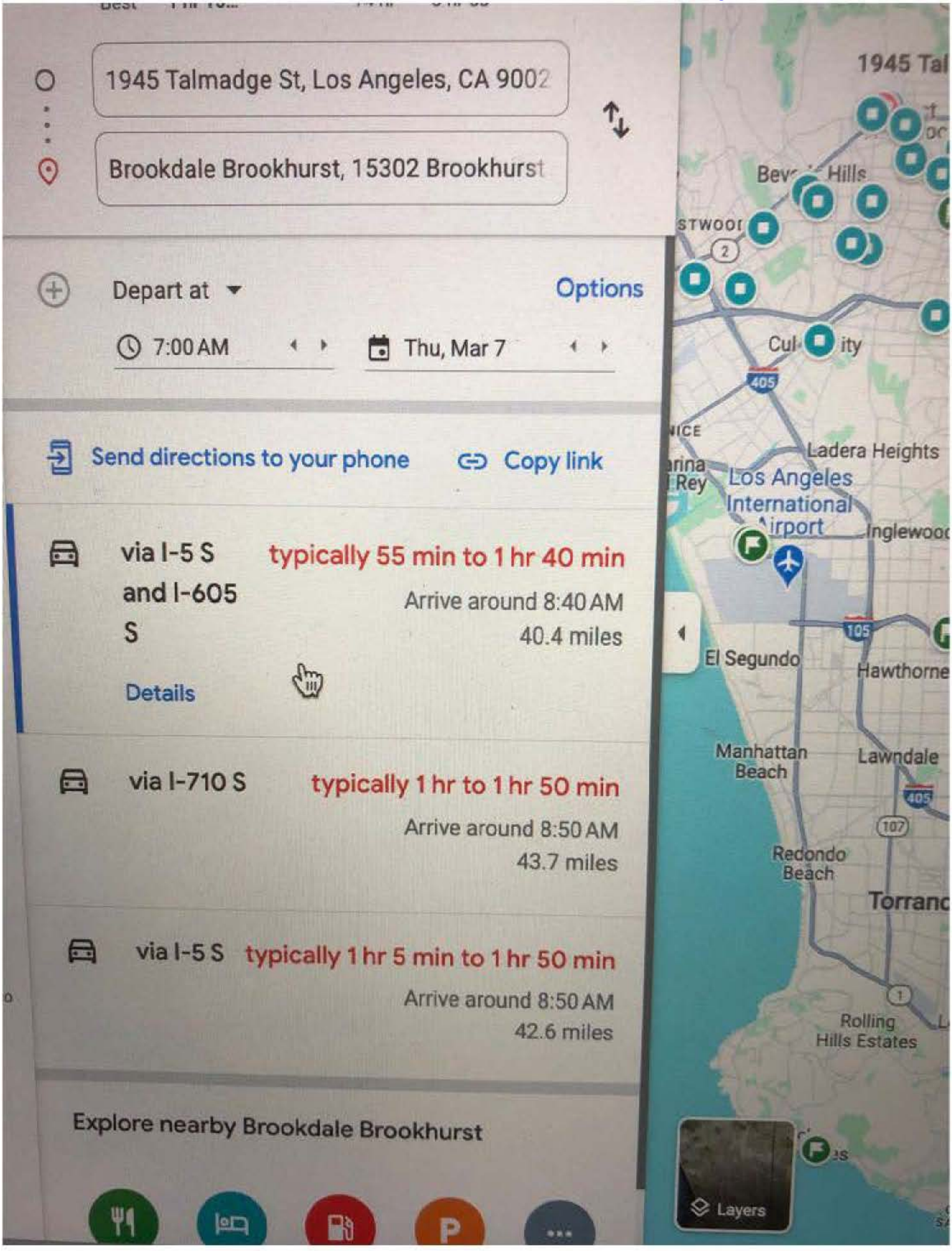
MD BIGGIE BAG	5.90
Double Stack	
Medium Fries	
MD Coke	
4 pc Spicy	
3 BBQ Dip Sauce (80.00)	
Total Items 4	
Tax	5.90
	0.46
DINE IN Total	6.36
Visa #XXXXXXXXXXXX3772	$6.36
Auth:096201	

Want a Free Sandwich?
Take our Survey!
www.TalkToWendys.com
(See Back for Details)

Wahoo's Fish Taco
Ontario International Airport
4/29/2022 12:35 PM
Check: CHK 147028
Server: 475669 Amber
Card Type: Visa
Acct Num: XXXXXXXXXXXX3772
Auth Code: 08104I
Amount: $16.68
Tip: 3
Total: 19.68
Signature:


Search mail
Thanks for riding with Francisco!
100% of tips go to drivers. Add a tip
Lyft fare (0.91mi, 2m 41s)
$4.88
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee
$3.60
SF Rideshare Tax
$0.27
Tip
$2.00
VISA Visa [redacted]
$10.75
You've already paid for this ride.
This total may not match the charge on your account statement. The payment for this ride might be combined with any other rides you took on March 9, 2024. Keep in mind that the cost of this ride and the total charge may not reflect refunds, credits, or other charges.
The fare above includes any other Fees and Other Charges, as applicable.
Search

STARBUCKS Store #605
260 Northgate One
San Rafael, CA (415) 492-1928
CHK 728471
03/05/2024 06:48 AM
XXX5400 Drawer: 1 Reg: 2
Cafe
Order
Cheese & Fruit Box 6.65
Sausg Cheddr Sdw 4.75
Subtotal 11.40
Discounts 0.00
Tax 0.00
Gratuity 2.00
Total 13.40
Change Due 0.00
Payments
Arbol Residences
of Santa Rosa Bistro
300 Fountaingrove Pkwy
Santa Rosa, CA
95403
707-566-9600
03/05/2024 13:18
Sale
Trans #: 5 Batch #: 0
VISA CHIP Contactless **/**
AMOUNT: $2.73
Resp: AUTH/TKT 013551
Code: 013551
Ref #: 464265749319816
Appl Name: CHASE VISA
AID: A0000000031010
TVR: 0000000000
CUSTOMER COPY


1945 Talmadge St, Los Angeles, CA 9002
Brookdale Brookhurst, 15302 Brookhurst
Depart at
Options
7:00 AM
Thu, Mar 7
Send directions to your phone
Copy link
via I-5 S and I-605 S
typically 55 min to 1 hr 40 min
Arrive around 8:40 AM
40.4 miles
Details
via I-710 S
typically 1 hr to 1 hr 50 min
Arrive around 8:50 AM
43.7 miles
via I-5 S
typically 1 hr 5 min to 1 hr 50 min
Arrive around 8:50 AM
42.6 miles
Explore nearby Brookdale Brookhurst
Layers
Ladera Heights
Los Angeles International Airport
Inglewood
El Segundo
Hawthorne
Manhattan Beach
Lawndale
Redondo Beach
Rolling Hills Estates

Starbucks Coffee #22635
13992 Brookhurst Street
Garden Grove, CA XXX-XXX-XXXX

CHK 685552
03/07/2024 07:54 AM
XXX4533 Drawer: 1 Reg: 1

Cafe
Order

Impossible Sausge	5.75
Cheese & Fruit Box	6.45
Ethos Water 700Ml	2.65
Bottle Dep/Crv	0.05
Siete Trtlla Chip	2.55
Sk Lemon Almonds	2.95

Subtotal	20.40
Discounts	0.00
Tax	0.00
Total	20.40
Change Due	**0.00**

Payments

Visa 20.40
XXXXXXXXXXXX[redacted]
Card Entry: CONTACTLESS
Trans Type: SALE
App Label: CHASE VISA
Auth: 02159D
AID: A0000000031010
TVR: 0000000000
TSI: 0000

kyte.

COMPACT

$159.85 | 2 day(s)

Toyota Corolla or similar

5 seats · 2 suitcases

Tip your surfer

Say thank you to with a tip.

Tip Delivery | Tip Return

Where & When

DELIVERY INFO

327 North Orange Drive, Los Angeles, CA 90036

Mar 12, 08:30 PM

RETURN INFO

327 North Orange Drive, Los Angeles, CA 90036

Mar 14, 10:30 AM

Return process

WELCOME

DATE 3/14/24 9:53
TRAN#9020213
PUMP# 02
SERVICE LEVEL: SELF
PRODUCT: REGULAR
GALLONS: 5.974
PRICE/G: $4.999
FUEL SALE $29.86
CREDIT $29.86

USD$29.86
**********[redacted]
Entry: Chip Read
AppName: CHASE VISA
AuthNet: VISA
MODE: Issuer
AID: A0000000031010
Auth #: 09527D
Resp Code: 000
Stan: 346613402743
Invoice #: 858093
Shift #: 1
Store # 9764655

Starbucks Coffee #56556
215 and Va
Riverside, CA XXX-XXX-XXXX

CHK 716242
03/13/2024 07:39 AM
XXX6210 Drawer: 2 Reg: 1

Cafe
Order

Grpft Sprk Wtr 355	2.45
Bottle Dep/Crv	0.05
Ethos Water 700Ml	2.65
Bottle Dep/Crv	0.05
String Cheese	1.95
Pb&J Protein Box	5.95
Salted Chips	1.75
Impossible Sausge	5.95
Tl Blonde Roast W/Room	2.65

Subtotal	23.45
Discounts	0.00
Tax	0.00
Gratuity	1.00
Total	24.45
Change Due	**0.00**

Payments

Visa	24.45

COURTYARD BY MARRIOTT

Courtyard by Marriott® Santa Cruz
313 Riverside Avenue, Santa Cruz, CA 95060 P 831.419.8700
Marriott.com/SJCRU

A. Spiegel

Room: 305
Room Type: KING
Number of Guests: 1
Rate: $139.00
Clerk:

Arrive: 19Mar24 Time: 09:21PM Depart: 21Mar24 Time: 12:00PM Folio Number: 97150

DATE	DESCRIPTION	CHARGES	CREDITS
19Mar24	Room Charge	139.00	
19Mar24	Occupancy Sales Tax	16.68	
19Mar24	State Occupancy Tax	0.27	
19Mar24	Calif/Local Tourism Fee	2.15	
19Mar24	Daily Parking	25.00	
20Mar24	Market Packaged Food	3.25	
20Mar24	Sales Tax	0.30	
20Mar24	Market Packaged Food	2.00	
20Mar24	Sales Tax	0.19	
20Mar24	Room Charge	139.00	
20Mar24	Occupancy Sales Tax	16.68	
20Mar24	State Occupancy Tax	0.27	
20Mar24	Calif/Local Tourism Fee	2.15	
20Mar24	Daily Parking	25.00	
21Mar24	Visa		371.94
	Card #: VIXXXXXXXXXXXX[redacted]XXXX		
	Amount: 371.94 Auth: 034880		
	This card was electronically swiped on 19Mar24		

BALANCE: 0.00

As a Marriott Bonvoy Member, you could have earned points towards your free dream vacation today. Start earning points and Elite status, plus enjoy exclusive member offers. Enroll today at the front desk.

See our "Privacy & Cookie Statement" on Marriott.com.

Operated under license from Marriott International, Inc. or one of its affiliates

Bring the Courtyard sleep experience home with you. Visit ShopCourtyard.com.

Lúpulo Craft Beer House
233 Cathcart Street
Santa Cruz, CA 95060
831.454.8306

Server: BAR P
Check #229
Ordered: 3/20/24 7:05 PM

Taco Plate	$14.00
Arugula	$12.00
Subtotal	$26.00
Tax	$2.41
Total	$28.41
Input Type	C (EMV Chip Read)
VISA CREDIT	XXXXXXXX[redacted]
Transaction Type	Sale
Authorization	Approved
Approval Code	067360
Payment ID	WCypXcFngmf0
Application ID	A0000000031010
Application Label	VISA CREDIT
Terminal ID	
Card Reader	BBPOS

Amount $28.41

+ Tip: 5.00

= Total: 33.41

X _____
ADRIENNE SPIEGEL

From: Adrienne
To: Adrienne Spiegel
Subject: Fwd: Receipt from 11th Hour Coffee
Date: Thursday, March 21, 2024 7:31:29 AM

[EXTERNAL MESSAGE NOTICE]

---------- Forwarded message ----------
From: **11th Hour Coffee** <messenger@messaging.squareup.com>
Date: Thursday, March 21, 2024
Subject: Receipt from 11th Hour Coffee
To: [redacted]

Square automatically sends receipts to the email address you used at any Square seller. Learn more

11th Hour Coffee

Let 11th Hour Coffee know how your experience was

$22.08

Cappuccino	$6.25
Almond Milk	
Full Caf	$0.00
Hot	$0.00

Ceramic Cup	$0.00
Simple Avocado Toast	$9.00
Almond Scone (GF)	$4.00
Purchase Subtotal	$19.25
Sales Tax (9.25%)	$0.83
Tip	$2.00
Total	**$22.08**

11th Hour Coffee
(831) 322-4599

Visa [redacted] (Contactless)
VISA CARDHOLDER

Mar 21 2024 at 7:18 AM
#PZXp
Auth code: 04496D

AID: A0000000031010
No CVM

Receipt Settings

Not your receipt? Turn off automatic receipts
Manage preferences

© 2024 Square Privacy Policy
1955 Broadway, Suite 600
Oakland, CA 94612

Cruise Coffee Cafe

46 Kings Village
Scotts Valley, CA 95066

Mar 21, 2024
12:22 PM

Ticket: Adriene
Receipt: nbUe
Authorization: 07038D

CAPITAL ONE VISA
AID A0 00 00 00 03 10 10

TO GO

Caprese Sandwich × 1	$9.00
Avocado Toast × 1	$7.00
Refill of coffee × 2 ($1.00 each)	$2.00
Cowboy cookie × 1	$4.00
Tea (Loose Leaf) × 1 Mint	$4.00
Subtotal	$26.00
Tip	$5.20
Total	$31.20
Visa [redacted] (Contactless)	$31.20
Visa Cardholder	

The Real Taco
820 Swift Street
Santa Cruz, CA 95060

21/3/2024 7:26 PM

Order Number: 335

---

1 Pork Chile Verde Burrito $13.75

Subtotal	$13.75
Sales Tax & Fees	$01.27
Tips	$02.25
Total	**$17.27**

Thank You!

receipt: DHSGIC for your flight on 3/27/24.

<service@ifly.alaskaair.com>
gmail.com

Reply | Reply All | →

how this message is displayed, click here to view it in a web browser.
tures. To help protect your privacy, Outlook prevented automatic download of some pictures in thi

08:15 PM

SFO

San Francisco

Right-click or tap and ho...

09:47 PM

LAX

Los Angeles, CA

Summary of airfare charges

Amy Xu
*American # ***CR24*
Ticket 0272364786053

Base fare and surcharges	$321.86
Taxes and other fees	$54.34
Per-person total	$376.20
Total charges for air travel	**$376.20**

View all taxes, fees and charges.

Nonrefundable fare of $376.20 to be charged to the Visa card with number ********** [redacted] held by Amy Xu on Mar 21, 2024.

1 / 1 − 80% +

HYATT REGENCY

Hyatt Regency San Francisco
Five Embarcadero Center
San Francisco, CA 94111
Tel: 415.788.1234
Fax: 415.398.2567
sanfrancisco.hyatt.com

COPY OF INVOICE

Amy Xu
[redacted]
Los Angeles CA 90037
United States

Room No. 0309
Arrival 03-27-24
Departure 03-28-24
Folio Window 1
Folio No. 1811024

Confirmation No. 1562669201
Group Name

Date	Description		Charges	Credits
03-27-24	Accommodation		293.02	
03-27-24	Occupancy Tax		41.02	
03-27-24	Tourism Assessment		3.66	
03-27-24	CA Assessment		0.57	
03-27-24	Moscone District Assessment		3.66	
03-27-24	Destination Fee		35.00	
03-27-24	Destination Fee Occ Tax		4.90	
03-27-24	Destination Fee Tourism Assessment		0.35	
03-27-24	Destination Fee Moscone District Assessment		0.44	
03-28-24	Visa	XXXXXXXXXXXX[redacted]XX/XX		382.62
		Total	382.62	382.62
		Balance	0.00	

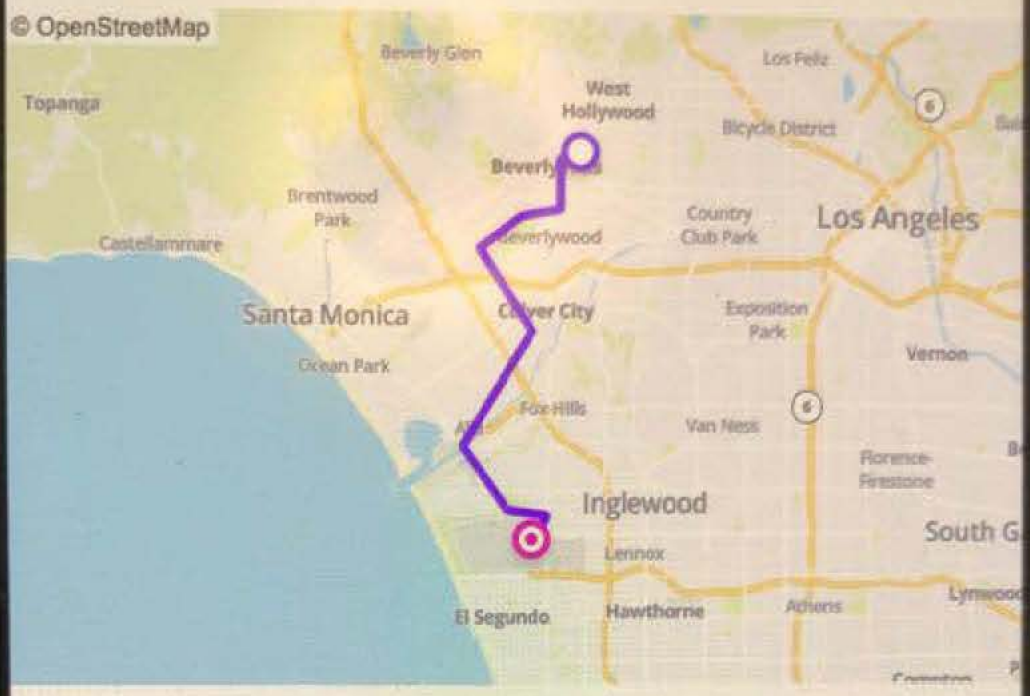
Guest Signature

I agree that my liability for this bill is not waived and I agree to be held personally liable in the event that the indicated person, company or association fails to pay for any part or the full amount of these charges.

WE HOPE YOU ENJOYED YOUR STAY WITH US!

F5 F6 F7 F8 F9 F10 F11

Mar 27, 2024, 2:58 PM • 13.6 miles • 53 min



[redacted]
Los Angeles, CA 90048

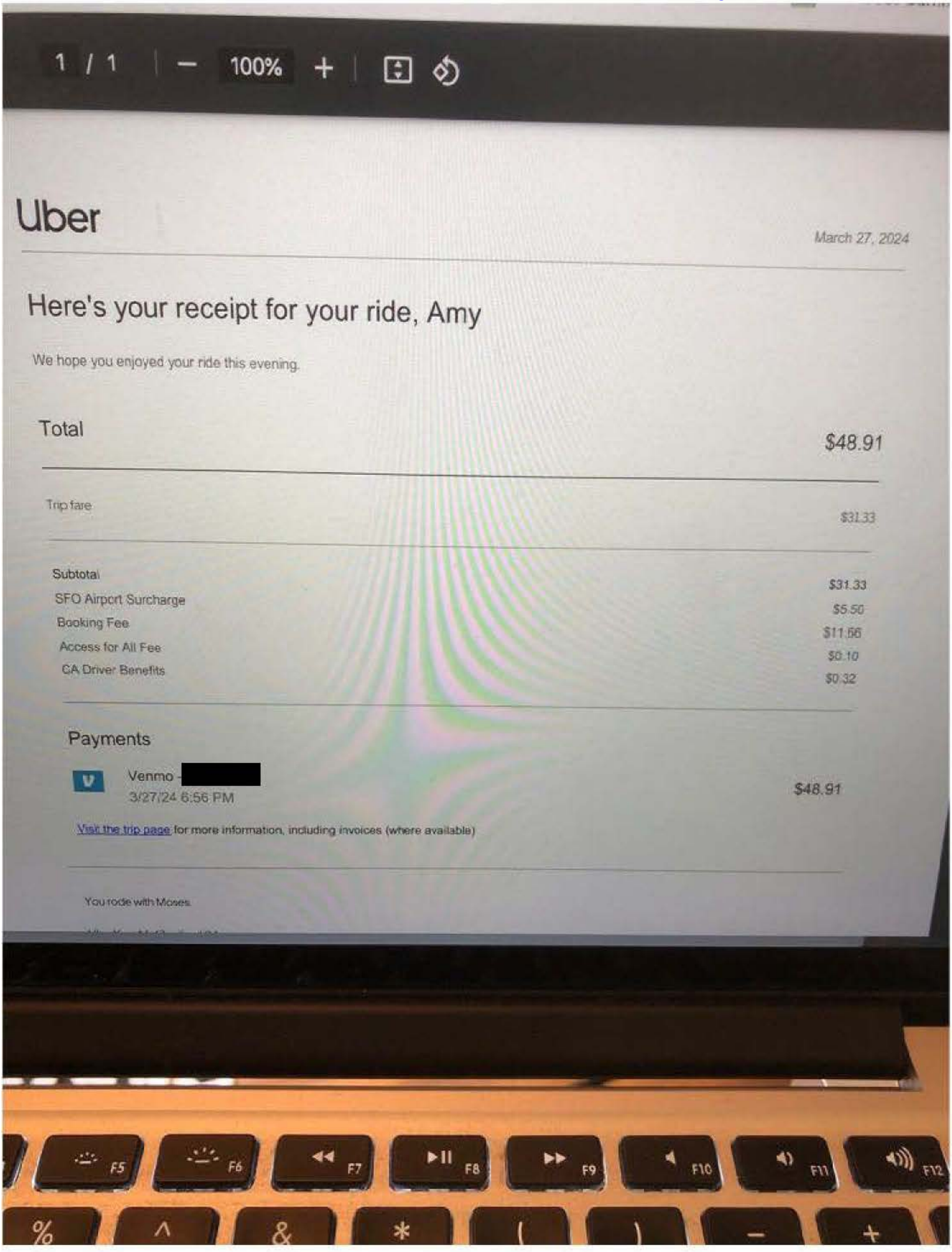
Pickup
14:58

Alaska
Los Angeles, CA 90045

Drop-off
15:52

Payment

Lyft Standard fare (13.6 mi, 53m)	$43.84
Service Fee, includes a $0.75 Lyft California Driver Benefits Fee	$4.15
Tip	$7.20



1 / 1 − 100% +

Uber

March 27, 2024

Here's your receipt for your ride, Amy

We hope you enjoyed your ride this evening.

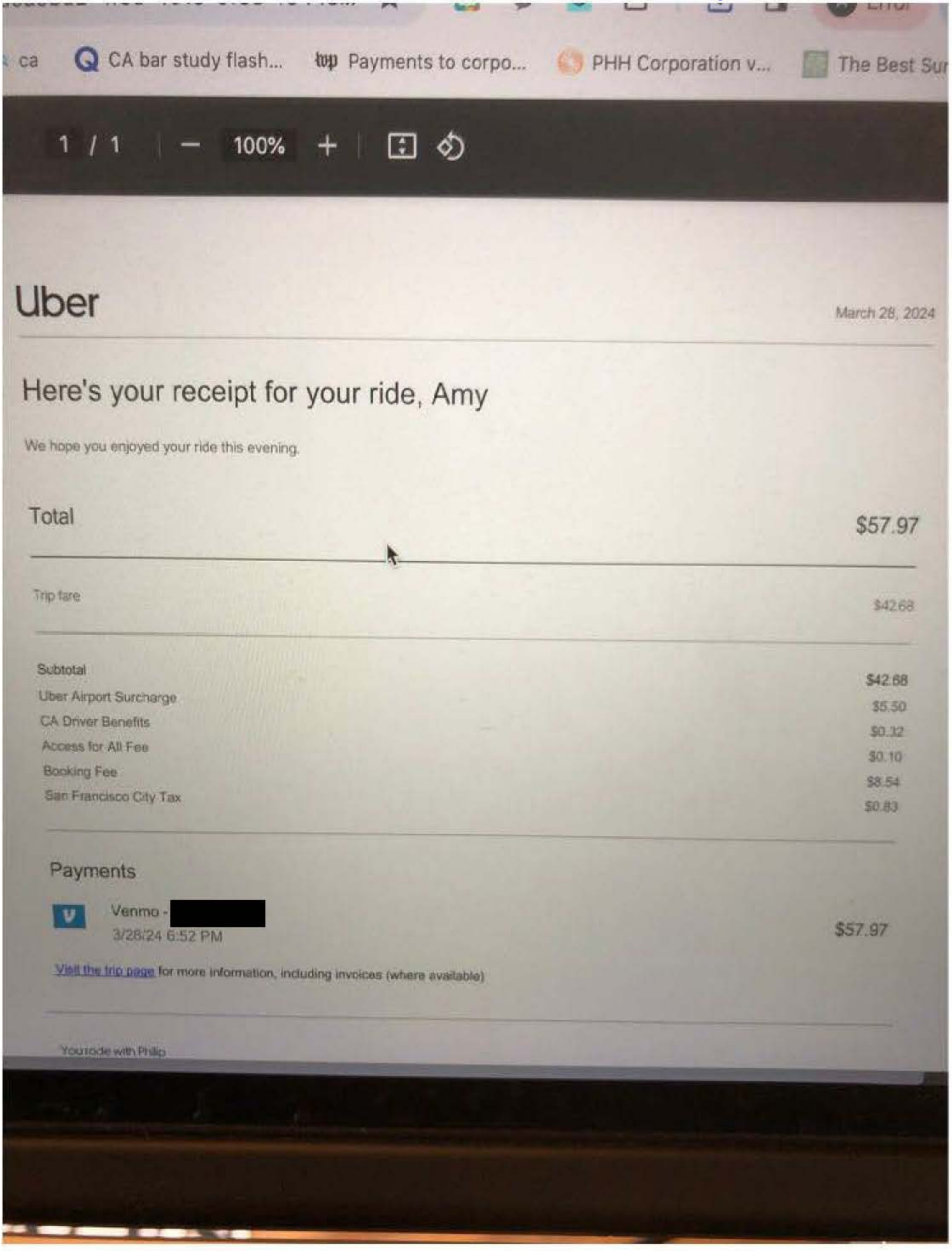
Total	$48.91
Trip fare	$31.33
Subtotal	$31.33
SFO Airport Surcharge	$5.50
Booking Fee	$11.56
Access for All Fee	$0.10
CA Driver Benefits	$0.32

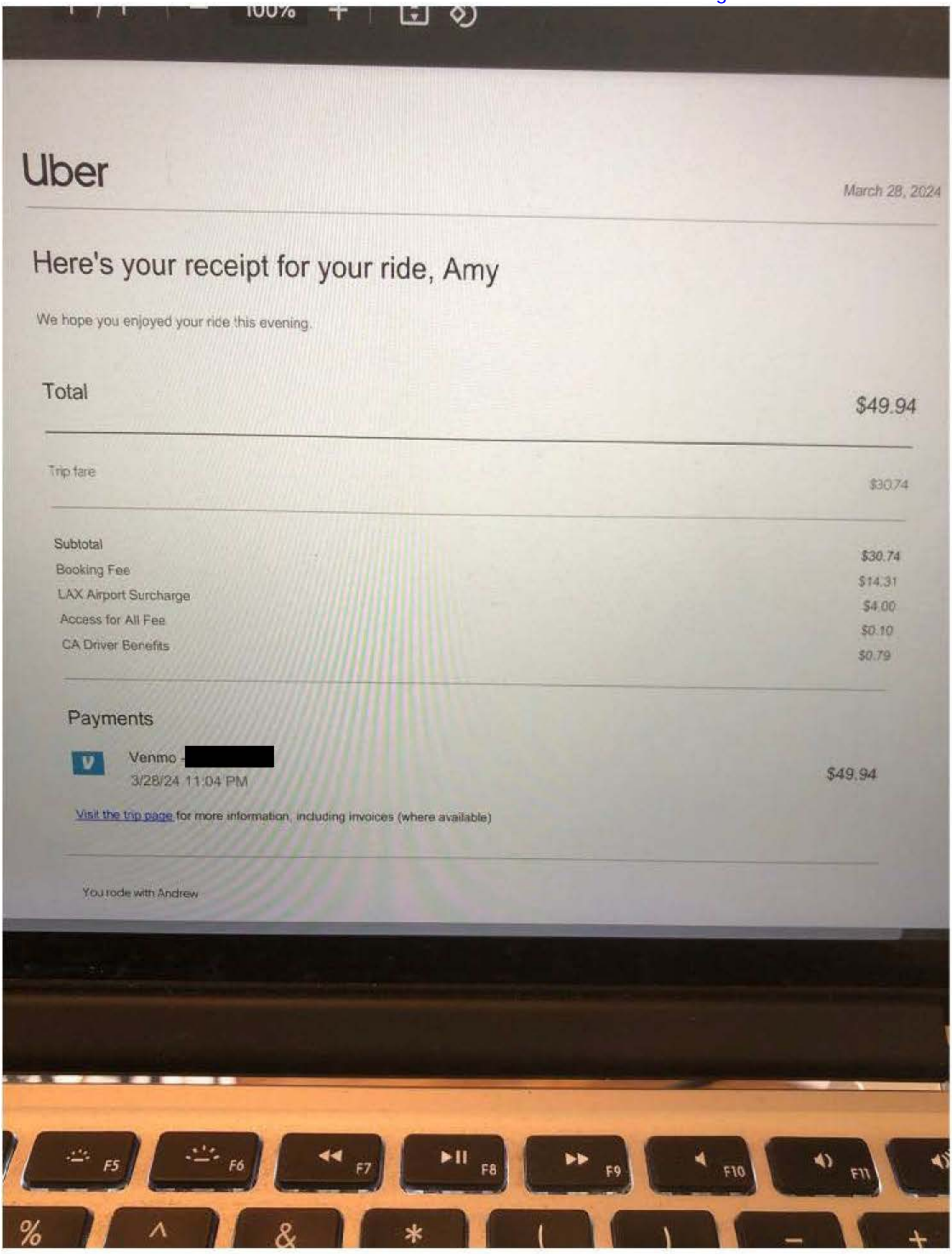
Payments

Venmo [redacted]
3/27/24 6:56 PM $48.91

Visit the trip page for more information, including invoices (where available)

You rode with Moses


ca
CA bar study flash...
Payments to corpo...
PHH Corporation v...
The Best Sur
1 / 1
100%
Uber
March 28, 2024
Here's your receipt for your ride, Amy
We hope you enjoyed your ride this evening.
Total
$57.97
Trip fare
$42.68
Subtotal
$42.68
Uber Airport Surcharge
$5.50
CA Driver Benefits
$0.32
Access for All Fee
$0.10
Booking Fee
$8.54
San Francisco City Tax
$0.83
Payments
Venmo -
3/28/24 6:52 PM
$57.97
Visit the trip page for more information, including invoices (where available)
You rode with Philip



Uber

March 28, 2024

Here's your receipt for your ride, Amy

We hope you enjoyed your ride this evening.

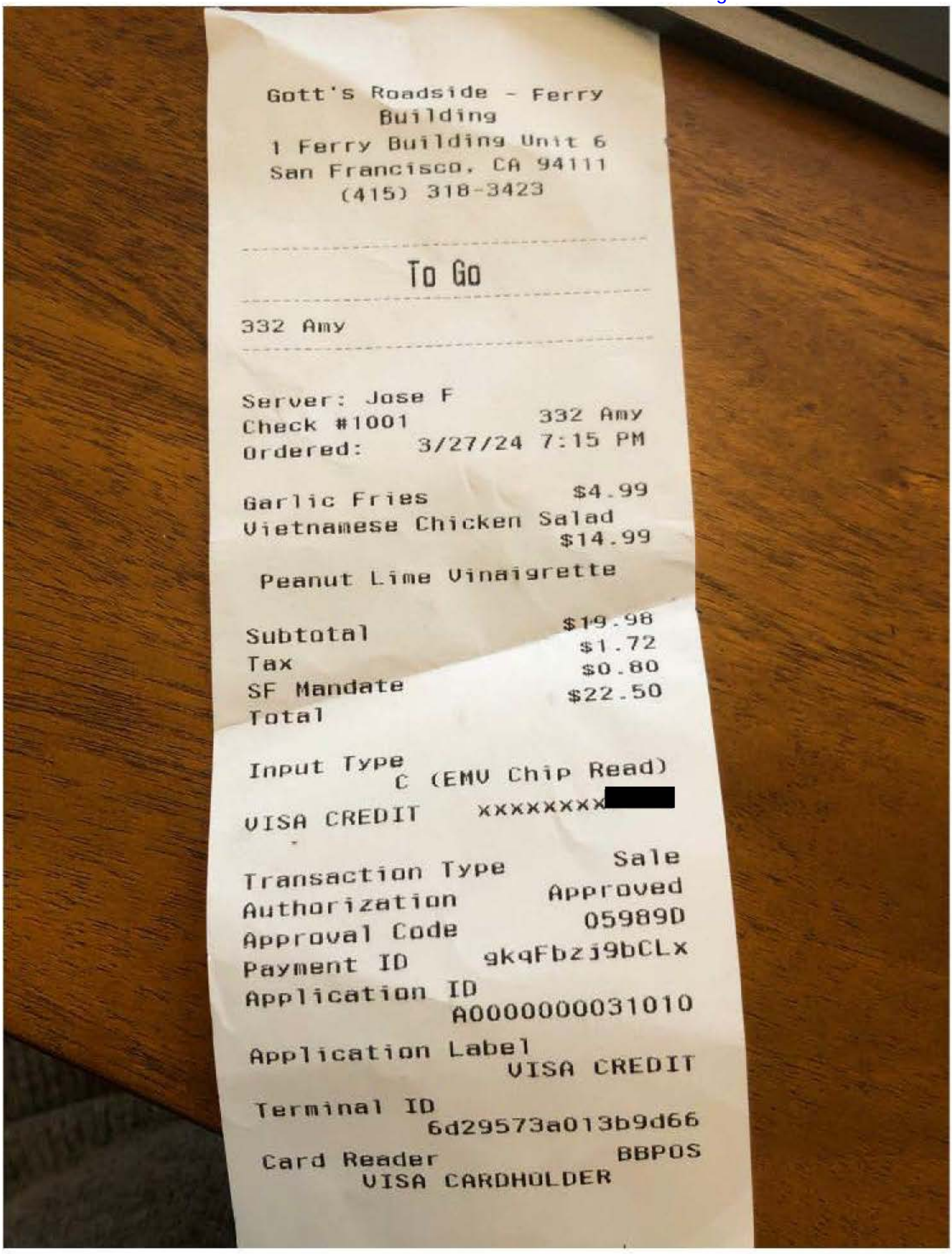
Total	$49.94
Trip fare	$30.74
Subtotal	$30.74
Booking Fee	$14.31
LAX Airport Surcharge	$4.00
Access for All Fee	$0.10
CA Driver Benefits	$0.79

Payments

Venmo - [redacted]
3/28/24 11:04 PM $49.94

Visit the trip page for more information, including invoices (where available)

You rode with Andrew



Gott's Roadside - Ferry Building
1 Ferry Building Unit 6
San Francisco, CA 94111
(415) 318-3423

To Go

---

332 Amy

Server: Jose F
Check #1001 332 Amy
Ordered: 3/27/24 7:15 PM

Garlic Fries $4.99
Vietnamese Chicken Salad $14.99
Peanut Lime Vinaigrette

Subtotal $19.98
Tax $1.72
SF Mandate $0.80
Total $22.50

Input Type C (EMV Chip Read)
VISA CREDIT xxxxxxxx[redacted]

Transaction Type Sale
Authorization Approved
Approval Code 05989D
Payment ID gkqFbzj9bCLx
Application ID A0000000031010
Application Label VISA CREDIT
Terminal ID 6d29573a013b9d66
Card Reader BBPOS
VISA CARDHOLDER

[redacted]

Transaction details

$26.09
Sale

Mar 29, 2024
Transaction date

Pending (typically posts within 1-3 business days)
Posted date

Description TST* PROPER FOOD - 35 SPE

Category Food & drink

Keep in mind

These details may change once we finish processing the transaction—typically within 2-3 business day

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Wednesday, January 22, 2025 6:06 PM
To: Accounting
Subject: 1457-1 Travel from Home of Jeanette Algarme to airport [IMAN-DMS.FID39756]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

Amex charge below. Travel in connection with visit to named plaintiff and her former facility. Please bill the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor

San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Uber Receipts <noreply@uber.com>
Sent: Thursday, January 9, 2025 2:25 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Thursday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Total $39.00

In October 2024 in California, roughly 31% of customers' fares went toward covering government-mandated commercial insurance for rideshare/TNC (transportation network company) trips. Take action to bring down costs.

Trip fare	$17.64
Subtotal	$17.64
Booking Fee	$12.86
Access for All Fee	$0.10
CA Driver Benefits	$0.40

Airport Surcharge	$3.00
Tip	$5.00

Payments

American Express ••••[redacted] $39.00

1/9/25 2:24 PM

Switch Payment Method

Download PDF

You rode with Ezequiel

4.96★ Rating

Has passed a multi-step safety screen

When you ride with Uber, your trips are insured in case of a covered accident.

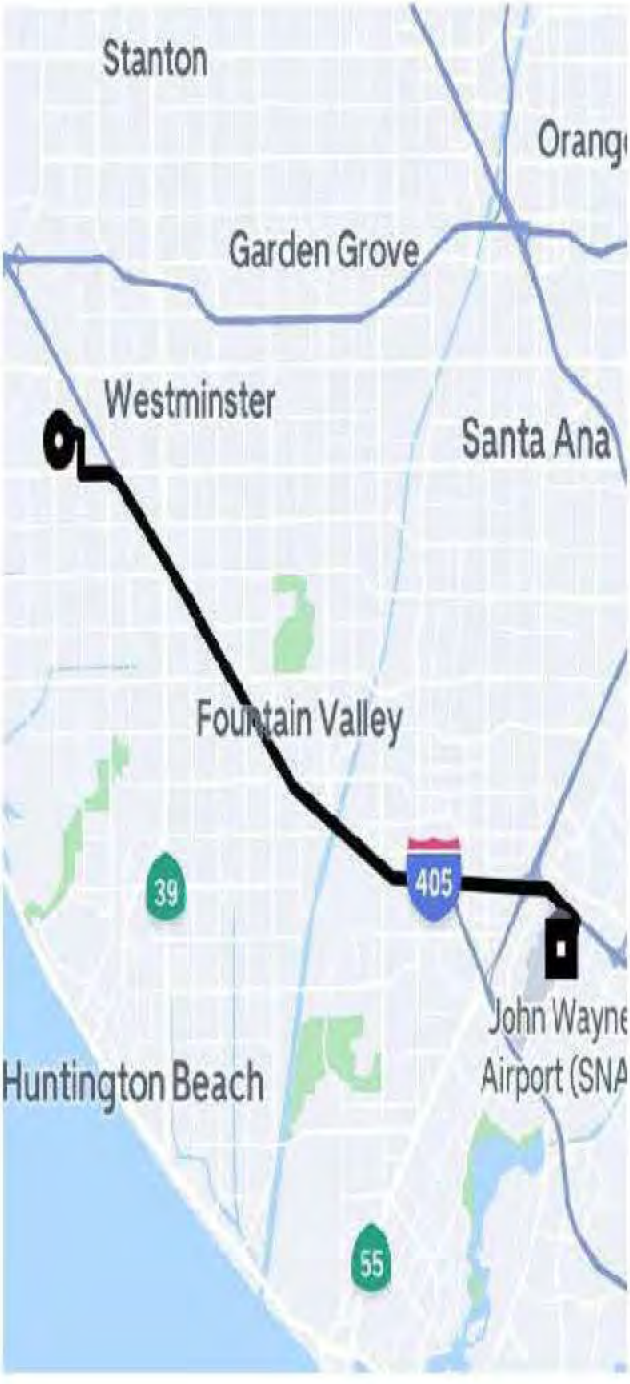
Learn more ›

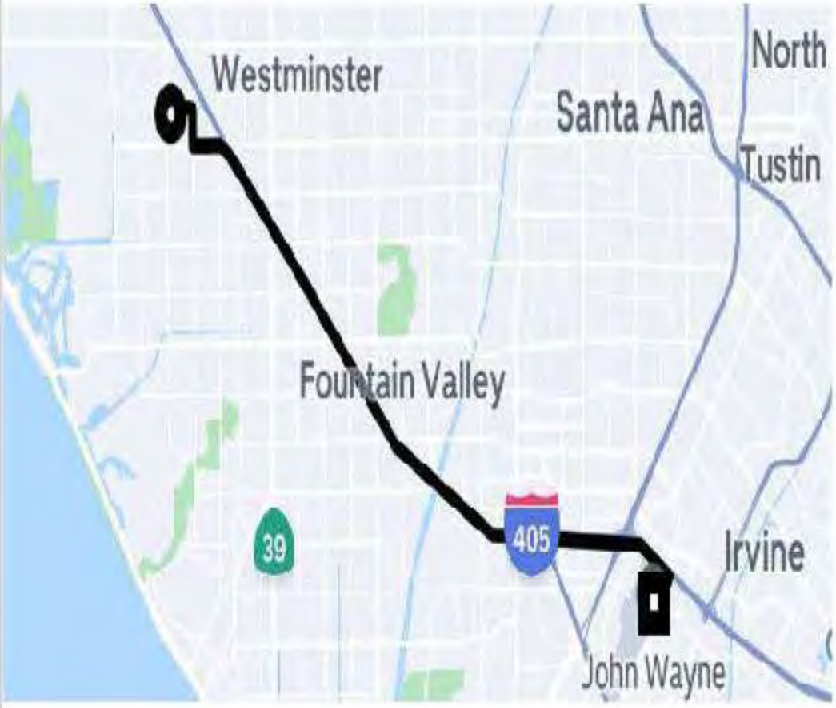
12:34 PM

[redacted]

12:53 PM

Terminal B, John Wayne Airport (SNA), Santa Ana, CA 92707, US





Report lost item ⟩ Contact support⟩ My trips ⟩

Contact support ⟩

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Thursday, January 23, 2025 2:01 PM
To: Accounting
Subject: 1457-1 Receipt for Travel to Brookhurst with Jeanette Algarme

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

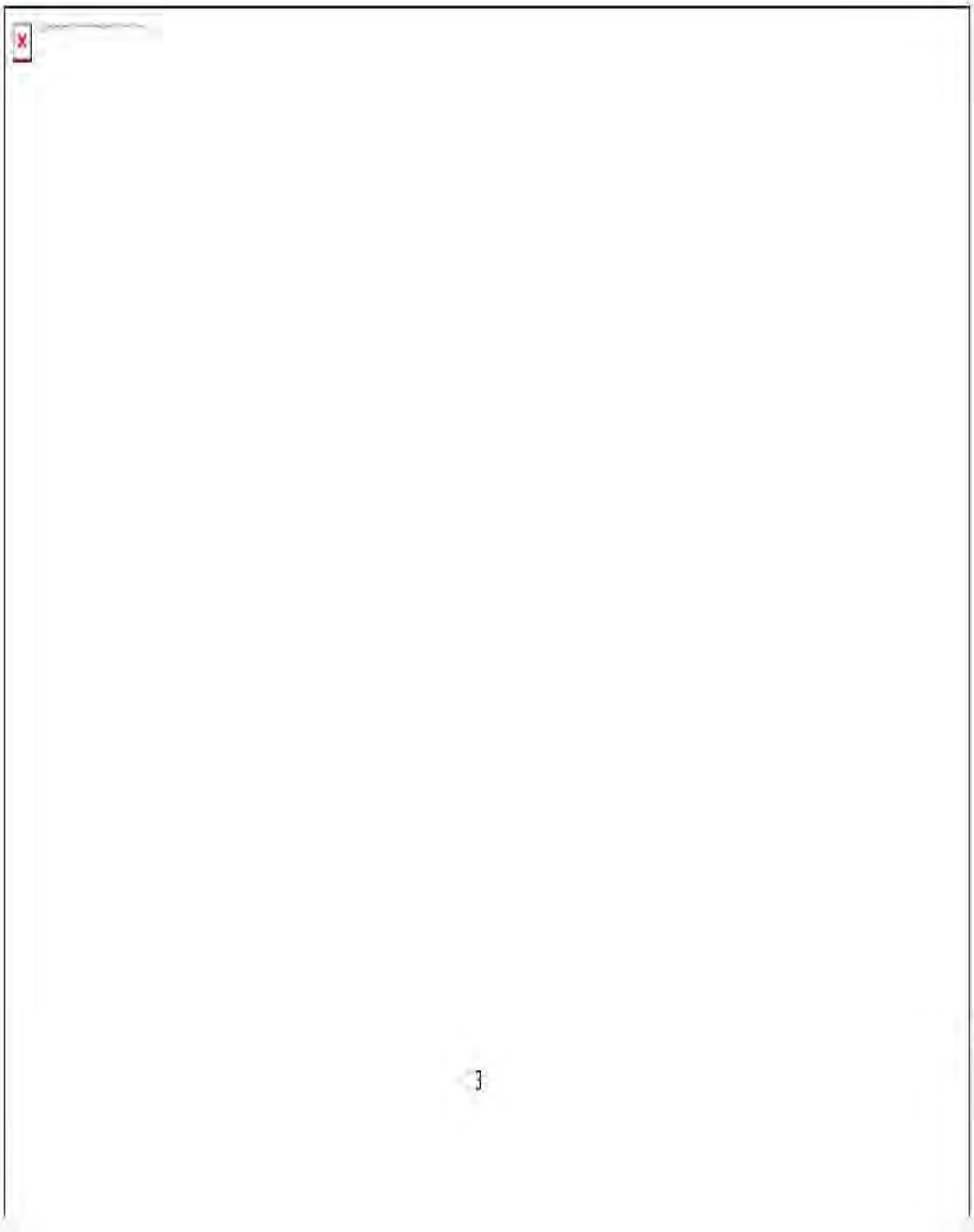
The charge below to my Amex was for travel to Brookhurst with the named plaintiff. Please bill the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor

San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Pacific Town Car <ride@pacifictowncar.com>
Sent: Thursday, January 9, 2025 10:32 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: Payment Receipt [For Conf# 30578]

[EXTERNAL MESSAGE NOTICE]



For Confirmation #30578

Tra
Dat
01/

Method:	AmericanExpress ** [redacted]
Total Paid:	$151.55
Transactions:	AUTH_CAPTURE $151.55 (20054893966)
Passenger:	Gay Grunfeld
Trip Confirmation#	30578
Trip Date & Time:	01/09/2025 05:20
Routing Information:	**Pick-up Location:** Home, [redacted] San Francisco, **Drop-off Location:** SFO

Charges & Fees	Flat Rate	$95.00
	Standard Gratuity 18.000%	$20.70
	Fuel Surcharge 9.000%	$10.35
	Airport Entry Fee	$5.50
	Night charge(10:30pm - 5:30am) 1 x 20.00	$20.00

Reservation Total:	$151.55
Payments/Deposits:	$151.55
Authorizations:	$0.00
Total Due:	$0.00

Issuer Response Code:	00
Auth Code:	130717
Customer Code:	30238

Sutter Stockton Garage
444 Stockton St
San Francisco, 94108

AP 263 12/14/24 18:04
Receipt 51474

Short-term parking tkt
SSG - No. 009133
12/14/24 08:28
12/14/24 18:04
Period 0d9h37'
(Tax) $38.00

Total $38.00

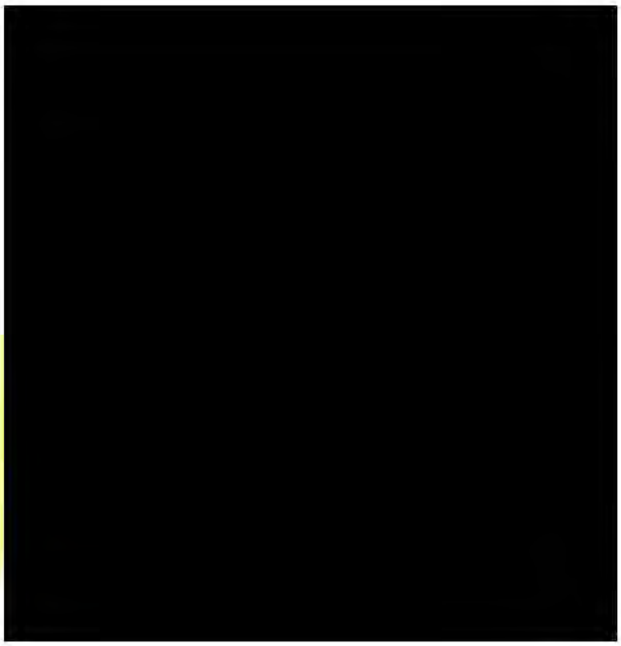
Payment Received
AID A000000025010801
APP LABEL AMERICAN EXPRESS
CARD **********[redacted]
AUTHORIZATION 858344
TOTAL USD$38.00

APPROVED

Sub Total $30.40
Tax 25% $7.60

All Amounts in USD.

07320645 - 1/1



Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, December 17, 2024 8:25 PM
To: Accounting
Subject: 1457 Transportation to Court [IMAN-DMS.FID39756]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

Pre-trial conference –all team members—charged to my amex; please bill the case

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105

(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Tuesday, December 17, 2024 4:39 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Tuesday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Uber

Total **$122.07**
December 17, 2024

The picture can't be displayed.

Total	**$122.07**
Trip fare	$98.83
Subtotal	$98.83
Bay Bridge Eastbound	$7.00

CA Driver Benefits	$0.32
Tip	$15.92

Payments

American Express ••••[redacted] 12/17/24 4:38 PM	$122.07

Trip ID: e59f9b78-4f9d-4209-a3ca-8d2012306480

Switch Payment Method

Download PDF

You rode with Narzullo

5.00★ Rating

Has passed a multi-step safety screen

Issued on behalf of Narzullo

License Plate: 73042V2

When you ride with Uber, your trips are insured in case of a covered accident.

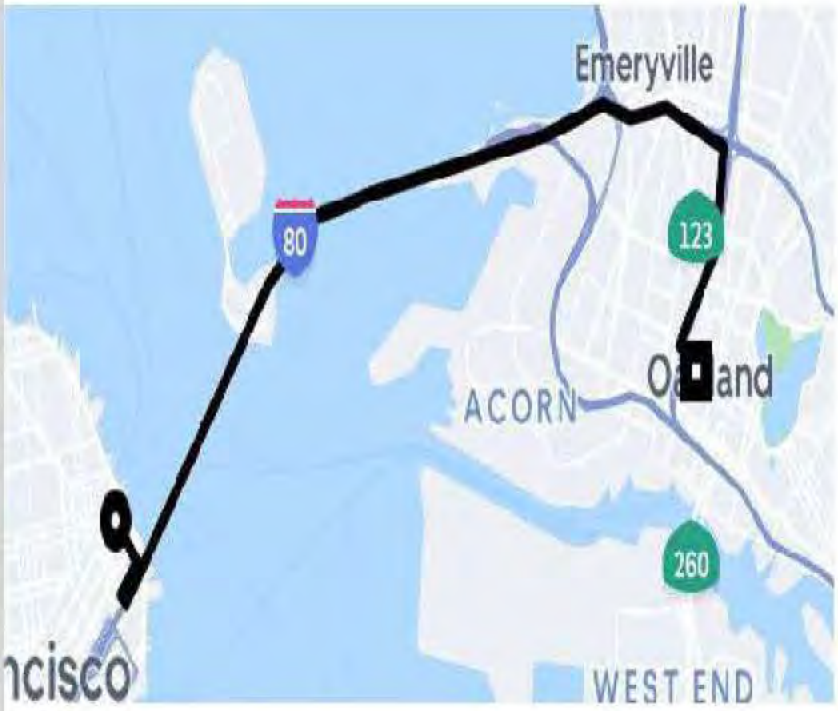
Learn more ›

2:08 PM

101 Mission St, San Francisco, CA

2:28 PM

1301 Clay St, Oakland, CA



Report lost item ⟩

Contact support⟩

Contact support ⟩

My trips ⟩

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, December 17, 2024 8:48 PM
To: Accounting
Subject: 1457 Transportation to Court [IMAN-DMS.FID39756]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

This was for the team to return to the firm after the pre-trial conference. Billed to my Amex. Please charge the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor

San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Tuesday, December 17, 2024 5:33 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Tuesday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Uber

Total **$52.96**
December 17, 2024

Total $52.96

In October 2024 in California, roughly 31% of customers' fares went toward covering government-mandated commercial insurance for rideshare/TNC (transportation network company) trips. Take action to bring down costs.

Trip fare	$21.07
Subtotal	$21.07
Bay Bridge Westbound	$7.00
Booking Fee	$14.47
Access for All Fee	$0.10
CA Driver Benefits	$0.32

Tip	$10.00

Payments

American Express ••••[redacted] 12/17/24 5:32 PM	$52.96

Trip ID: 67ef84c3-1299-4fcf-9614-10a8af7797f1

Switch Payment Method

Download PDF

You rode with MATTHEW

4.94★ Rating

Has passed a multi-step safety screen

License Plate: 7PIB528

When you ride with Uber, your trips are insured in case of a covered accident.

Learn more ⟩

4:31 PM

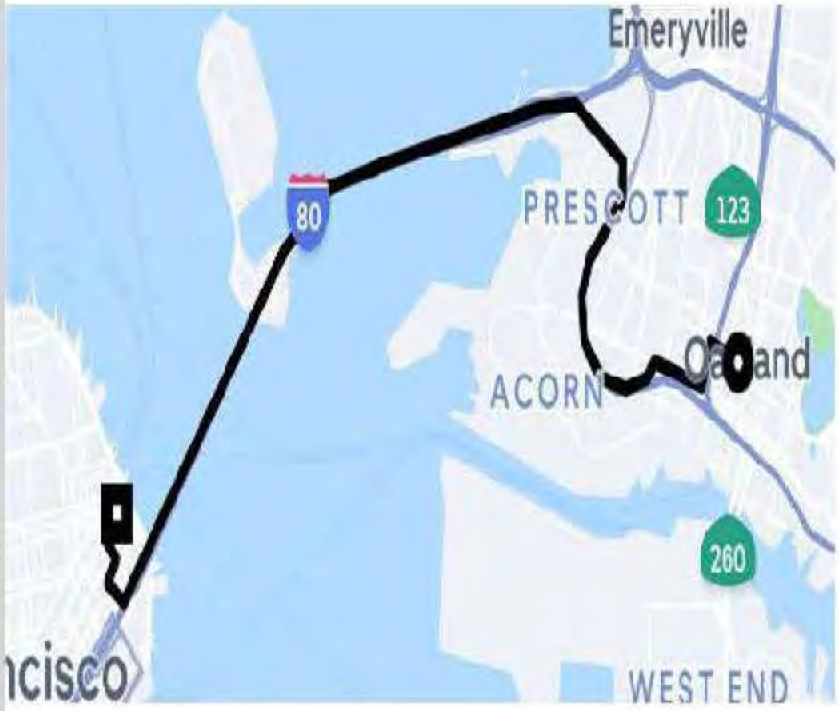
1200 Clay St Ste 58,

Oakland, CA

4:58 PM

101 Mission St, San

Francisco, CA

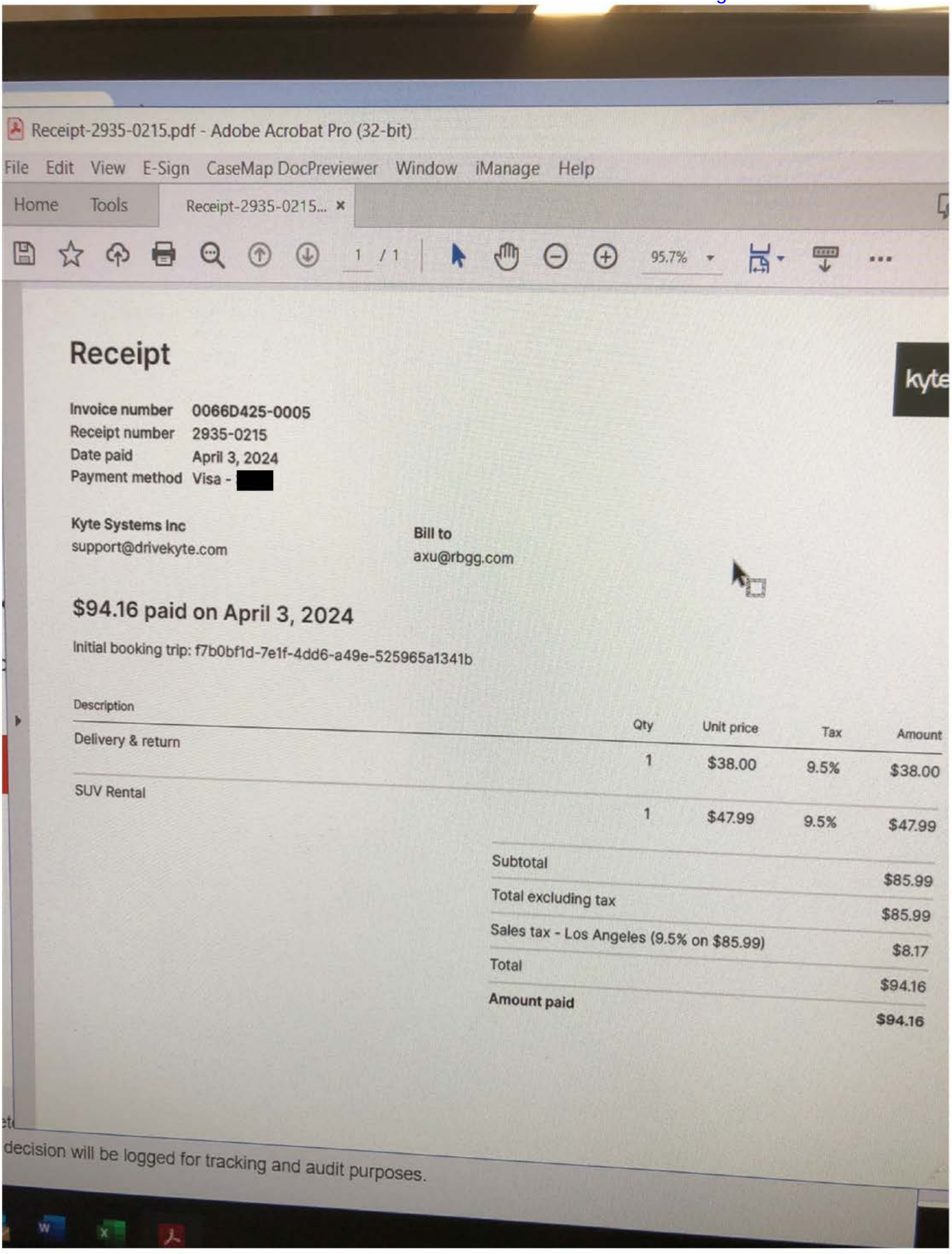


Report lost item 〉

Contact support〉

Contact support 〉

My trips 〉



Receipt-2935-0215.pdf - Adobe Acrobat Pro (32-bit)

File Edit View E-Sign CaseMap DocPreviewer Window iManage Help

Home Tools Receipt-2935-0215... ×

1 / 1 95.7%

Receipt

kyte

Invoice number 0066D425-0005
Receipt number 2935-0215
Date paid April 3, 2024
Payment method Visa - [redacted]

Kyte Systems Inc
support@drivekyte.com

Bill to
axu@rbgg.com

$94.16 paid on April 3, 2024

Initial booking trip: f7b0bf1d-7e1f-4dd6-a49e-525965a1341b

Description	Qty	Unit price	Tax	Amount
Delivery & return	1	$38.00	9.5%	$38.00
SUV Rental	1	$47.99	9.5%	$47.99

Subtotal	$85.99
Total excluding tax	$85.99
Sales tax - Los Angeles (9.5% on $85.99)	$8.17
Total	$94.16
Amount paid	**$94.16**

decision will be logged for tracking and audit purposes.

307 N. LA BREA AVE.
LOS ANGELES CA 90036

307.N LA BREA AVE
LA BREA CHEVRON
00371672
LOS ANGELES, CA

04/04/2024 46038793
05:32:16 PM

XXXXXXXXXXXX[redacted]
VISA
INVOICE E/7202796
AUTH 04600D

PUMP# 4

UNLEAD REG	4.059G
PRICE/GAL	$5.799
FUEL TOTAL	$ 23.54
Total =	$ 23.54
CREDIT	$ 23.54

Chip Read
CHASE VISA
Mode: Issuer
AID: A0000000031010

Get rewarded on
every fill-up at
Chevron with a
Techron Advantage
card. See app
for details.

I agree to pay the
above total amount
according to card
issuer agreement.

THANK YOU FOR SHOPPING
WITH US.... PLEASE COME
BACK SOON!!!! Customer

City Center Garage
14th Street
Oakland, 94612

14th A Exi 06/27/24 15:23
Receipt 068453

Short-term parking tkt
LVL A - No. 070963
06/27/24 13:21
06/27/24 15:23
Period 0d2h3'

$36.00

Total $36.00

Payment Received
TRX REF NUM: 61383
CARD ENTRY: Swipe
PAN: xxxxxxxxxxxx[redacted]
VISA CREDIT
Sale 36.00 USD
APPROVED 00367D

Sub Total $36.00

380BF02 - 1/1

3. No receipt. Charge 1457-1. Description: Parking at USDC-ND to attend hearing on subclass certification motion.

06/27/24	OAKLAND PARK METER IPS 000000001 [redacted]	OAKLAND	CA	$3.45 ♦

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Thursday, September 19, 2024 6:17 PM
To: Accounting
Subject: 1457-1 Amex Charge for travel to court September 20--hearing on motion for miscellaneous relief

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Uber Receipts <noreply@uber.com>
Sent: Thursday, September 19, 2024 2:57 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Thursday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Uber

Total **$51.36**
September 19, 2024

Total	**$51.36**

In California, on average, roughly 33% of the customer price went towards covering government-mandated commercial insurance for rideshare in July 2024, one of the highest rates in the country.

Trip fare	$24.36
Subtotal	$24.36
Bay Bridge Eastbound	$7.00
Booking Fee	$11.16

Access for All Fee	$0.10
CA Driver Benefits	$0.32
Tip	$7.83
San Francisco City Tax	$0.59

Payments

American Express ••••[redacted] 9/19/24 2:56 PM	$51.36

Trip ID: 58e7cf12-41c3-4613-a33a-306964165767

Switch Payment Method

Download PDF

You rode with Mamoun

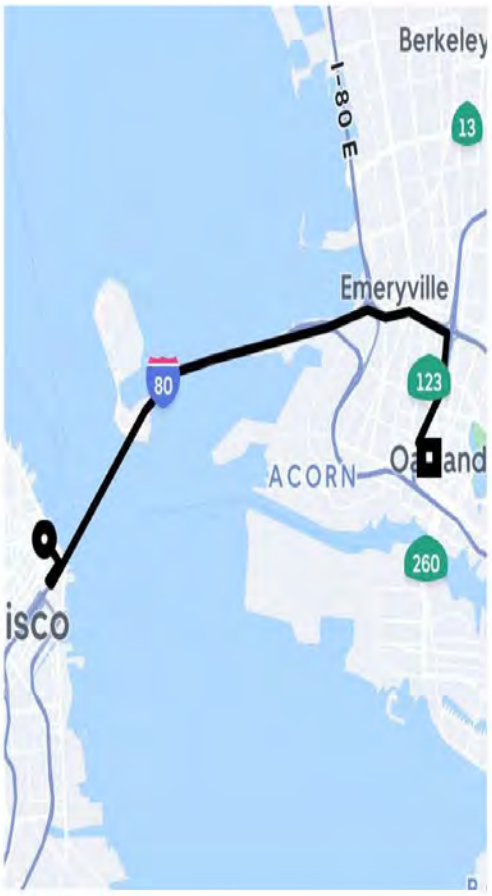
4.92★ Rating
Has passed a multi-step safety screen
License Plate: 9JYR187
When you ride with Uber, your trips are insured in case of a covered accident.
Learn more ›

1:19 PM

101 Mission St, San Francisco, CA

1:34 PM

1301 Clay St, Oakland, CA



Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Thursday, September 19, 2024 6:32 PM
To: Accounting
Subject: 1457-1 Amex Charge for travel to court September 20--hearing on motion for miscellaneous relief [IMAN-DMS.FID39756]

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

Return trip to the office

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Thursday, September 19, 2024 3:27 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Thursday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Uber

Total **$51.55**
September 19, 2024

The picture can't be displayed.

Total $51.55

In California, on average, roughly 33% of the customer price went towards covering government-mandated commercial insurance for rideshare in July 2024, one of the highest rates in the country.

Trip fare $24.35

Subtotal	$24.35
Bay Bridge Westbound	$7.00
Booking Fee	$11.92
CA Driver Benefits	$0.32
Access for All Fee	$0.10
Tip	$7.86

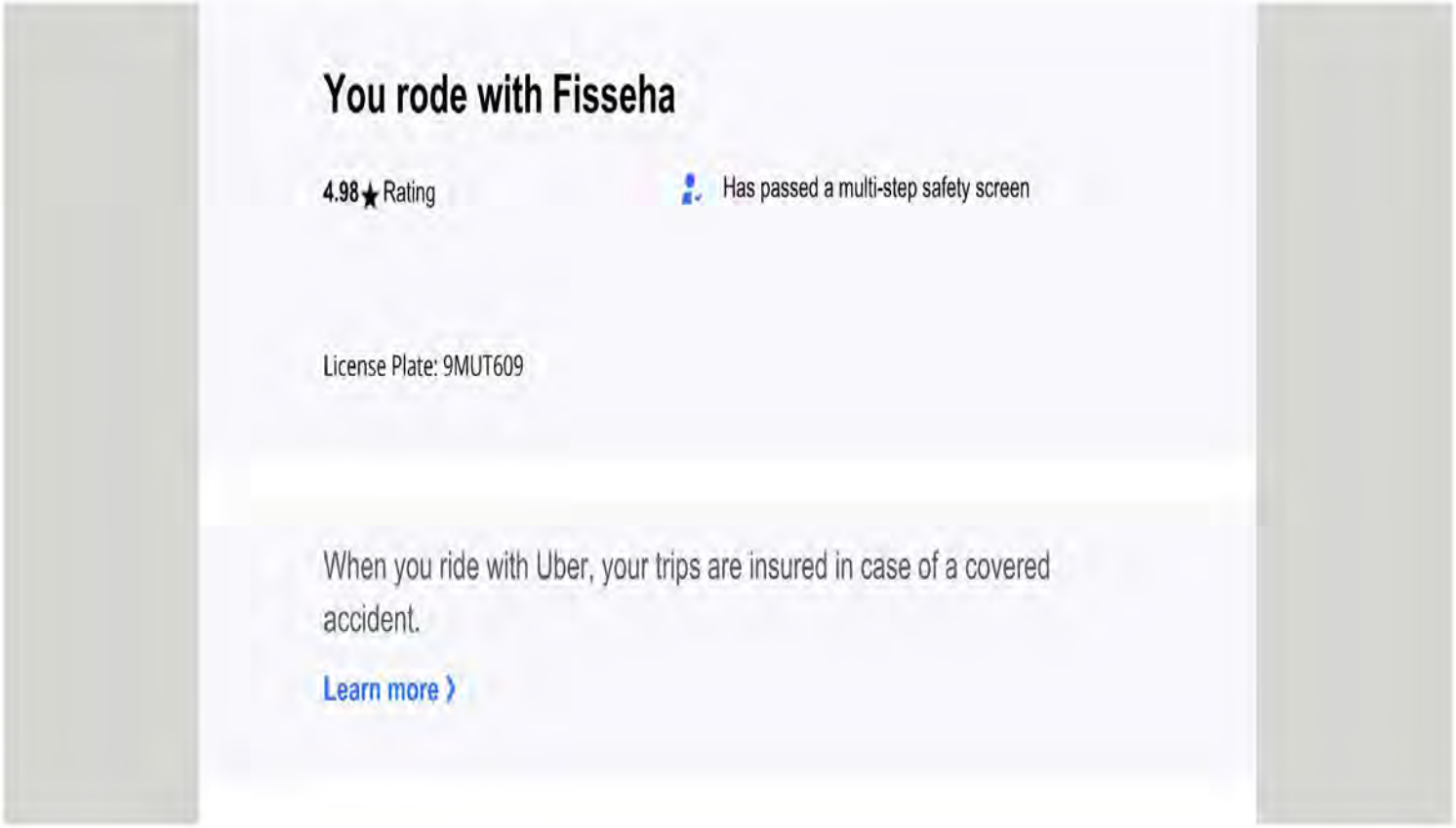
Payments

American Express ••••3004 $51.55
9/19/24 3:27 PM

Trip ID: 45995806-5f17-4022-be1f-ea8d8faa5f91

Switch Payment Method

Download PDF


You rode with Fisseha
4.98 ★ Rating
Has passed a multi-step safety screen
License Plate: 9MUT609
When you ride with Uber, your trips are insured in case of a covered accident.
Learn more ›

2:52 PM

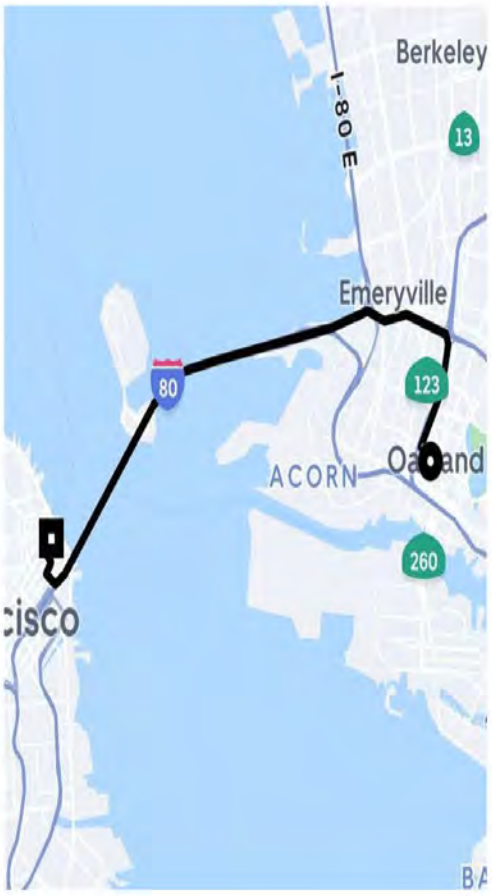
1200 Clay St Ste 58,

Oakland, CA

3:11 PM

101 Mission St, San

Francisco, CA



From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, November 5, 2024 1:18 AM
To: Accounting
Subject: 1457 Partner Reimbursement

Please reimburse me for 66 miles driven in my car to visit named Plaintiff Stacia Stiner at Brookhurst San Ramon. Also bridge toll of $7. Bill the case.

Gay Crosthwait Grunfeld
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 (telephone)
(415) 433-7104 (fax)
ggrunfeld@rbgg.com <mailto:ggrunfeld@rbgg.com>

CONFIDENTIALITY NOTICE
The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at rbgg@rbgg.com <mailto:rbgg@rbgg.com>

IRS CIRCULAR 230 NOTICE: As required by United States Treasury Regulations, you should be aware that this communication is not intended by the sender to be used, and it cannot be used, for the purpose of avoiding penalties under United States federal tax laws.

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, November 12, 2024 8:05 PM
To: Accounting
Subject: 1457-1 Amex Charge in connection with travel to federal court

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

For CMC. Please bill the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Tuesday, November 12, 2024 4:49 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Tuesday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Total **$57.06**
November 12, 2024

The picture can't be displayed.

Total $57.06

In California, on average, roughly 33% of the customer price went towards covering government-mandated commercial insurance for rideshare in July 2024, one of the highest rates in the country.

Trip fare $28.35

Subtotal	$28.35
Bay Bridge Westbound ☐	$7.00
Booking Fee ☐	$12.59
Access for All Fee ☐	$0.10
CA Driver Benefits ☐	$0.32
Tip	$8.70

Payments

☐ **American Express ••[redacted]** $57.06
11/12/24 4:48 PM

Trip ID: 05328214-c87d-4fbe-a2d0-3c861910862d

Switch Payment Method

Download PDF

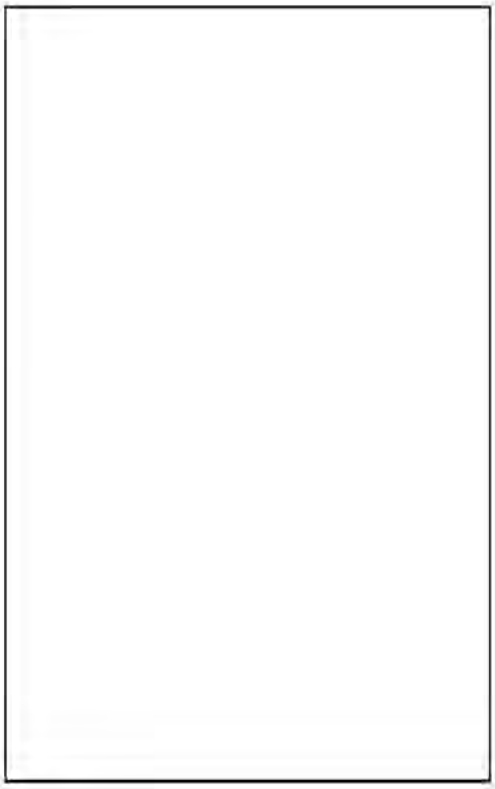
You rode with Tedros
4.99 Rating
Has passed a multi-step safety screen
License Plate: 9JQZ112
When you ride with Uber, your trips are insured in case of a covered accident.
Learn more ›

3:54 PM

1200 Clay St Ste 58,
Oakland, CA

4:12 PM

101 Mission St, San
Francisco, CA



Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Tuesday, November 12, 2024 7:40 PM
To: Accounting
Subject: 1457-1 Amex Charge in connection with CMC at court

Follow Up Flag: Follow up
Flag Status: Completed

Categories: Vinh

Please bill the case

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Tuesday, November 12, 2024 4:01 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Personal] Your Tuesday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Total **$56.31**
November 12, 2024

The picture can't be displayed.

Total $56.31

In California, on average, roughly 33% of the customer price went towards covering government-mandated commercial insurance for rideshare in July 2024, one of the highest rates in the country.

Trip fare $27.72

Subtotal	$27.72
Bay Bridge Eastbound	$7.00
Booking Fee	$11.93
Access for All Fee	$0.10
CA Driver Benefits	$0.32
Tip	$8.59
San Francisco City Tax	$0.65

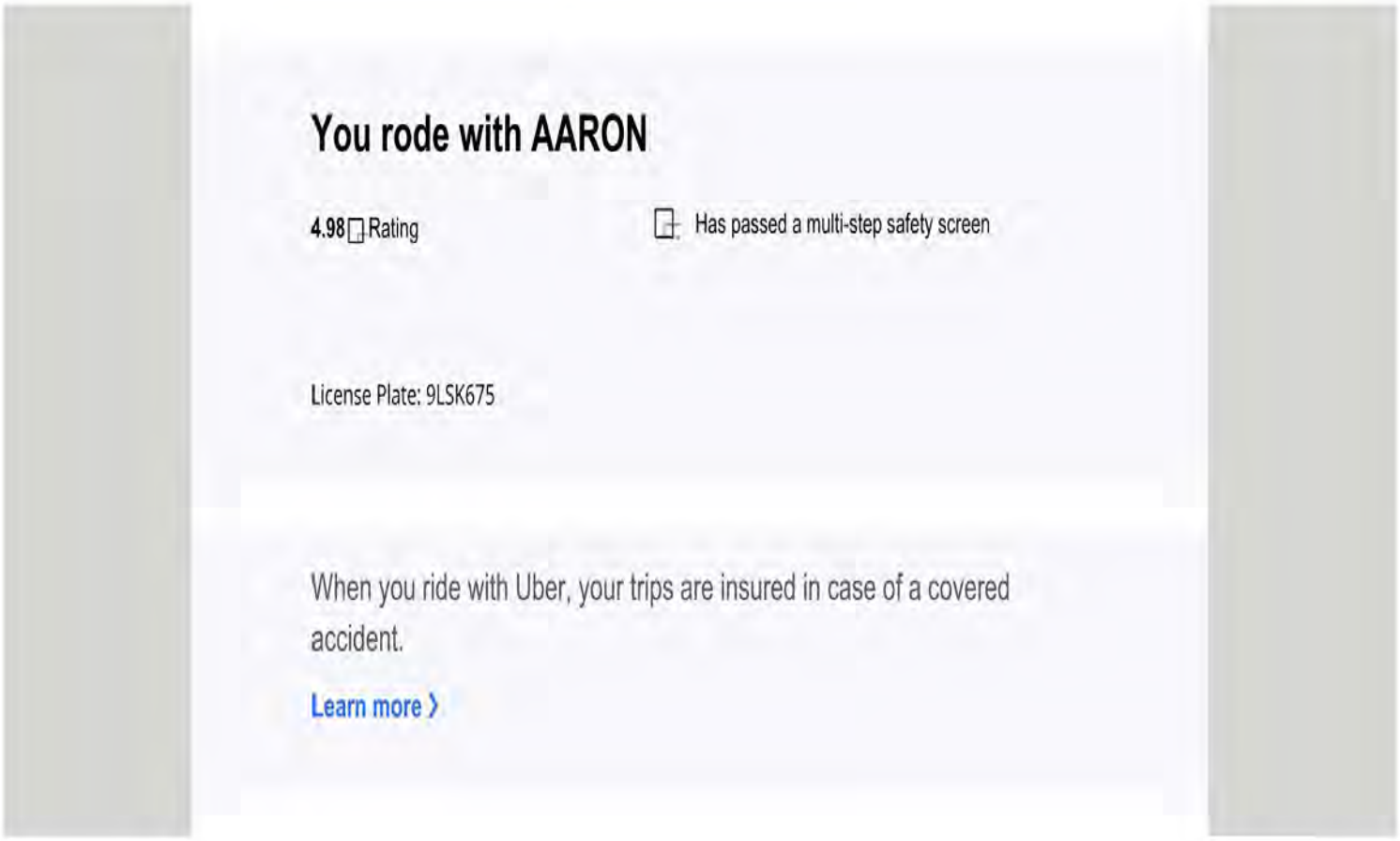
Payments

American Express ••••[redacted] 11/12/24 4:00 PM	$56.31

Trip ID: 67d7db3f-a7b3-4378-9188-a678a911e2fe

Switch Payment Method

Download PDF

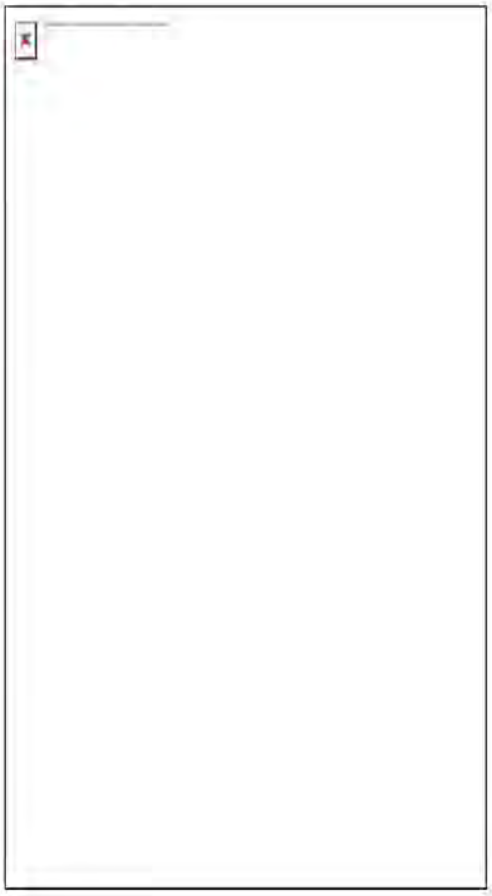

You rode with AARON
4.98 Rating
Has passed a multi-step safety screen
License Plate: 9LSK675
When you ride with Uber, your trips are insured in case of a covered accident.
Learn more ›

2:08 PM

101 Mission St, San Francisco, CA

2:24 PM

1301 Clay St, Oakland, CA



From: Darcy Edmundson
To: Darcy Edmundson
Subject: Fwd: Your ride with Faroq on January 14
Date: Wednesday, January 15, 2025 8:59:53 AM

[EXTERNAL MESSAGE NOTICE]

---------- Forwarded message ---------
From: **Lyft Receipts** <no-reply@lyftmail.com>
Date: Wed, Jan 15, 2025 at 8:54 AM
Subject: Your ride with Faroq on January 14
To: <[redacted]>

JANUARY 14, 2025 AT 4:17 PM

Thanks for riding with Faroq!

100% of tips go to drivers. Add a tip

Standard fare (9.61mi, 23m 47s)	$23.19
Service Fee, includes a $0.30 Lyft California Driver Benefits Fee	$3.80
Tip	$4.05
Promotion	-$1.34
Apple Pay (American Express)	**$29.70**

The fare above includes any other Fees and Other Charges, as applicable.

Ride Map

Pickup 4:17 PM
1200 Clay St, Oakland, CA

Drop-off 4:41 PM
98 Mission St, San Francisco, CA

Make expensing business rides easy

Enable business profile on Lyft to make expensing rides quick and easy.

1457-1

MIXT ONE MARKET

2/4/2025 12:54:20 PM
Order Id: AAABWMRNAEB9
#773 - In Store

#773

---

1 BEETNIK	$13.75
Sub Total	$13.75
Sales Tax	$1.19
Order Total	$14.94
American Express	$14.94
TIP AMOUNT	$2.68
AUTHORIZED AMOUNT	$17.62

Lunch dump add Conf

Card#: ********[redacted]
Authorization: 884105

APPROVAL: 884105
POS REF: 2
CCT REF: 2
AID: A0000000025010801
TVR: 0000008000
TSI: E800
APP LABEL: AMERICAN EXPRESS
BATCH #: 035001
ENTRY METHOD: NFC Entry

--> Order Closed <--

Please enjoy within 1 hour of requested time

NEED HELP? Email: hello@mixt.com

****
Loyalty Summary

Get the MIXT app = easy ordering + rewards

5326171983917

****

Vinh Phan

From: Kedra Chan <KChan@rbgg.com>
Sent: Wednesday, February 5, 2025 7:47 PM
To: Accounting
Cc: Gay C. Grunfeld
Subject: Receipts paid with GCG AMEX
Attachments: Admin-2 GCG Lunch 1-30-25.pdf; 1457-1 GCG lunch 02-04-2025.pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear Accounting, please see attached receipts paid with Gay's AMEX.

[redacted]

2. 1457-1: GCG Lunch on 2/4/2025

Kedra Chan [she/her]
Practice Assistant

ROSEN BIEN GALVAN & GRUNFELD LLP
Rosen Bien Galvan & Grunfeld LLP
101 Mission Street, Sixth Floor
San Francisco, California 94105-1738
T: (415) 433-6830 ▪ F: (415) 433-7104
kchan@rbgg.com

The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at kchan@rbgg.com.

From: Karen Stilber <KStilber@rbgg.com>
Sent: Friday, February 2, 2024 2:15 PM
To: Kira Hansen
Cc: Accounting
Subject: RE: Charge to Kira's AMEX for 1457-1

In addition to the charges described below, another charge in the approximate amount of $49 will show up – the taxi driver took one of our clients from the Brookdale facility in Scotts Valley to her home in Santa Cruz on the return

From: Kira Hansen <KHansen@rbgg.com>
Sent: Thursday, February 1, 2024 4:42 PM
To: Karen Stilber <KStilber@rbgg.com>
Cc: Accounting <Accounting@rbgg.com>; Jenny Yelin <JYelin@rbgg.com>
Subject: RE: Charge to Kira's AMEX for 1457-1

Thank you, Karen. Glad this worked out in the end!

Kira Hansen
Firm Administrator
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Karen Stilber <KStilber@rbgg.com>
Sent: Thursday, February 1, 2024 4:24 PM
To: Kira Hansen <KHansen@rbgg.com>
Cc: Accounting <Accounting@rbgg.com>; Jenny Yelin <JYelin@rbgg.com>
Subject: Charge to Kira's AMEX for 1457-1

Two charges of approximately $260 each from Yellow Cab of Silicon Valley should show up on Kira's AMEX. These are the to/from trip charges for our clients to attend the February 1 hearing in 1457-1.

We tipped the driver in cash and I will submit reimbursement requests for those.

Karen Stilber
Senior Paralegal
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 (telephone)
(415) 433-7104 (fax)
kstilber@rbgg.com

CONFIDENTIALITY NOTICE
The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at rbg@rbg-law.com.
IRS CIRCULAR 230 NOTICE: As required by United States Treasury Regulations, you should be aware that this communication is not intended by the sender to be used, and it cannot be used, for the purpose of avoiding penalties under United States federal tax laws.

zipcar

Mar 5, 2024	**Reservation: Cozmo - [redacted] San Francisco, CA 94122 (driven by Benjamin Joseph Bien Kahn)**	
	Zipcar Daily Included Miles (6:00am - 5:00pm)	$0.00
	Daily rate (6:00am - 5:00pm)	$85.50
	CA San Francisco County Sales Tax	$1.18
	CA State & Local Sales Tax	$6.20
	TOLL: Golden Gate Bridge Golden Gate Bridge 03/05/24 4:17pm	$9.75
	Cost	**$102.63**
	American Express •••• [redacted]	-$9.75
	American Express •••• [redacted]	-$92.88

06/27/24	YELLOW CHECKER CAB COMPAN 00-080118048 [redacted]	SAN JOSE	CA	$261.30 ♦
06/27/24	YELLOW CHECKER CAB COMPAN 00-080118048 [redacted]	SAN JOSE	CA	$260.40 ♦

[redacted]

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Thursday, January 9, 2025 2:21 PM
To: Accounting
Subject: 1457 request for reimbursement

Please reimburse me $40 used to tip the paratransit driver in a trip to Brookhurst with our name to plaintiff And bill the case Sent from my iPhone

Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Wednesday, January 22, 2025 5:59 PM
To: Accounting
Subject: 1457-1 Transportation to Pre-trial conference [IMAN-DMS.FID39756]

Follow Up Flag: Follow up
Flag Status: Completed

For RBGG team of 6. Amex charge below. Please bill the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: noreply=uber.com@mgt.uber.com <noreply=uber.com@mgt.uber.com> **On Behalf Of** Uber Receipts
Sent: Tuesday, January 14, 2025 5:54 PM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Tuesday afternoon trip with Uber

[EXTERNAL MESSAGE NOTICE]

Total **$121.95**
January 14, 2025

The picture can't be displayed.

Total $121.95

Trip fare	$95.03
Subtotal	$95.03
Bay Bridge Eastbound	$8.00
CA Driver Benefits	$0.32
Tip	$18.60

Payments

American Express ••••[redacted] $121.95

1/14/25 5:53 PM

Trip ID: ad55e471-a818-4c60-85d4-d493b174e3eb

Switch Payment Method

Download PDF

You rode with ABUBAKIR

5.00 Rating

Has passed a multi-step safety screen

Issued on behalf of ABUBAKIR

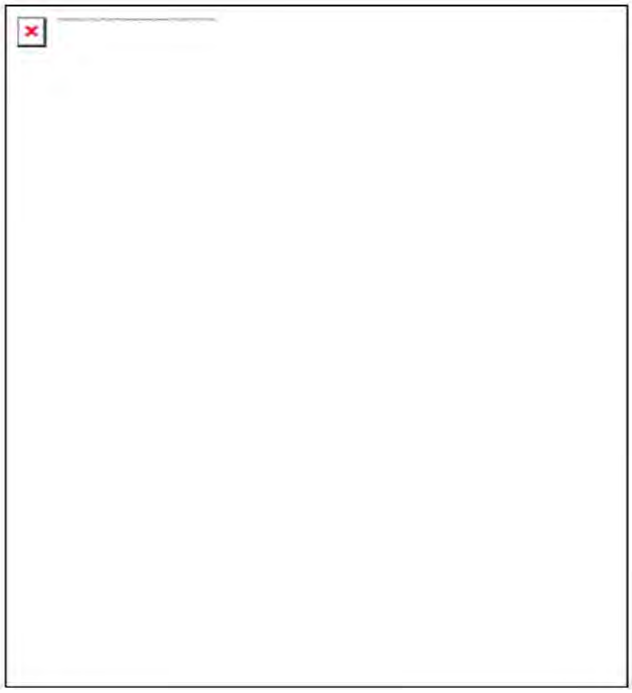
License Plate: 11517P3

When you ride with Uber, your trips are insured in case of a covered accident.

Learn more ›

2:08 PM
101 Mission St, San Francisco, CA

2:32 PM
1301 Clay St, Oakland, CA



Vinh Phan

From: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Sent: Wednesday, January 22, 2025 5:57 PM
To: Accounting
Subject: 1457-1 Transportation Back from Pre-trial Conference

Follow Up Flag: Follow up
Flag Status: Completed

Receipt on Amex below. Please bill the case.

Gay Crosthwait Grunfeld
Managing Partner
She/her
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

From: Uber Receipts <noreply@uber.com>
Sent: Wednesday, January 22, 2025 11:43 AM
To: Gay C. Grunfeld <GGrunfeld@rbgg.com>
Subject: [Business] Your Tuesday evening trip with Uber

[EXTERNAL MESSAGE NOTICE]

Total **$62.47**
January 14, 2025

The picture can't be displayed.

Total $62.47

In October 2024 in California, roughly 31% of customers' fares went toward covering government-mandated commercial insurance for rideshare/TNC (transportation network company) trips. Take action to bring down costs.

Trip fare	$28.96
Subtotal	$28.96
Bay Bridge Westbound	$8.00
Booking Fee	$15.09

CA Driver Benefits	$0.32
Access for All Fee	$0.10
Tip	$10.00

Payments

American Express ••••[redacted] 1/15/25 4:44 AM	$52.47
American Express ••••[redacted] 1/22/25 11:42 AM	$10.00

Trip ID: c764f441-6ad7-449a-be5d-bfea74dd8f35

Switch Payment Method

Download PDF

You rode with Waddah

4.94 Rating

Has passed a multi-step safety screen

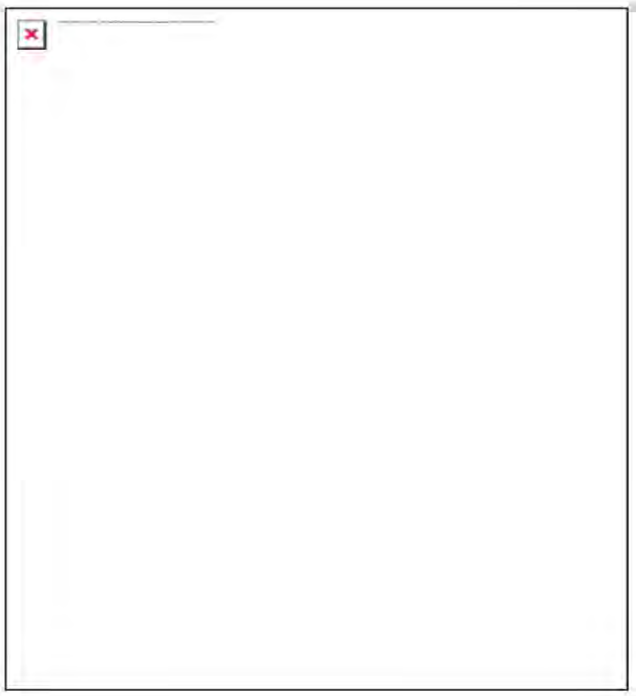
License Plate: 8NVE972

When you ride with Uber, your trips are insured in case of a covered accident.

Learn more >

5:48 PM
1301 Clay St, Oakland, CA

6:12 PM
101 Mission St, San Francisco, CA



United Litigation Discovery
220 Sansome St Suite 800
San Francisco, CA 94104
(415) 999-1335 Tax ID: 46-5681763

UNITED LITIGATION DISCOVERY

Invoice

Date	Invoice #
8/30/2021	31392

Bill To	Ship To
Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
1457-1	JC	1% 10 Net 30	08/18/2021	ULD-2108-0141	Karen Stilber

Item Code	Description	Quantity	Price Each	Amount
B&W with Assem...	Print B&W with Assembly	5,144	0.11	565.84
Number Tab	Number Tab	232	0.35	81.20
1.5" Binders	1.5" Binders	2	10.50	21.00
4" Binder	4" Binder	4	25.50	102.00
	Description:			
	Number of copies: 2 Double-sided Exhibits with side tabs (i.e., "Exhibit 1 . . . .) 3-holed punched at left Please put each set in a binder			
	Sales Tax (8.50%)		8.50%	65.45

Total	$835.49

Signature:_____ Date:_____

Invoice

United Litigation Discovery
220 Sansome St Suite 800
San Francisco, CA 94104
(415) 999-1335 Tax ID: 46-5681763

UNITED LITIGATION DISCOVERY

Date	Invoice #
11/18/2021	32250

Bill To	Ship To
Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
1457-1	JC	1% 10 Net 30	11/17/2021	ULD-2111-0155	Karen Stilber

Item Code	Description	Quantity	Price Each	Amount
Scan Grade D	Scan Heavy Litigation	504	0.15	75.60
Scan Color	Scan Color	25	0.85	21.25
File Naming	Custom File Naming	7	0.45	3.15
OCR	OCR	529	0.03	15.87
	Description: Scan all Important color only Create e-folder per rubber band/folder/binder PDF per smallest physical break Open envelopes carefully - note that envelope "appeared sealed" in title of doc Name PDFs starting with "0001" etc OCR			
	Sales Tax (8.625%)		8.625%	0.00
			Total	$115.87

Signature:_____ Date:_____

United Litigation Discovery
550 California St, STE 475
San Francisco, CA. 94104-1010
(415) 999-1335 Tax ID: 46-5681763

UNITED LITIGATION DISCOVERY

Invoice

Date	Invoice #
3/31/2024	40594

Bill To	Ship To
Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
IMAN-DMS.FID39756	WG	1% 10 Net 30	03/05/2024	ULD-2403-0040	Adrienne Spiegel

Item Code	Description	Quantity	Price Each	Amount
Forensic	Forensic - 1st Attempt remote iPhone collection. 03/05/2024	1	250.00	250.00
Forensic	Forensic - Email download "bjestrabekhart@gmail.com". 03/11/2024	1	250.00	250.00
Forensic	Forensic - Email download [redacted]. 03/12/2024	1	250.00	250.00
Forensic	Forensic - Email download [redacted] 03/13/2024	1	250.00	250.00
Forensic	Forensic - Create and upload file lists for all three PST files for Ryan Bonner. 03/20/2024	1.5	250.00	375.00
Forensic	Forensic - 2nd Attempt remote iPhone collection	1	250.00	250.00
Shipping	Shipping charge for HDD to Scotts Valley	1	78.15	78.15
Discount	Discount		-703.15	-703.15
	Description:			
	Case Name: IMAN-DMS.FID39756			
	iPhone and Email collection			
	waive the charges for the $703.15			
	Sales Tax (8.625%)		8.625%	0.00
			Total	$1,000.00

Signature:_____ Date:_____

United Litigation Discovery
550 California St, STE 475
San Francisco, CA. 94104-1010
(415) 999-1335 Tax ID: 46-5681763

UNITED LITIGATION DISCOVERY

Invoice

Date	Invoice #
4/15/2024	40749

Bill To	Ship To
Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
IMAN-DMS.FID39756	WG	1% 10 Net 30	04/15/2024	ULD-2404-0172	Adrienne Spiegel

Item Code	Description	Quantity	Price Each	Amount
Native Processing	Native Processing to Relativity (RSMF)	5.07	299.00	1,515.93
	Description: Case Name: IMAN-DMS.FID39756 Native Processing RSMF Custodian Names • Cust 01 Jestrabek-Hart, Bernie • Volume: 20240415_RSMF			
	Sales Tax (8.625%)		8.625%	0.00
			Total	$1,515.93

Signature:_____ Date:_____

United Litigation Discovery
550 California St, STE 475
San Francisco, CA. 94104-1010
(415) 999-1335 Tax ID: 46-5681763

UNITED LITIGATION DISCOVERY

Invoice

Date	Invoice #
4/29/2024	40855

Bill To	Ship To
Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Adrienne Spiegel Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
IMAN-DMS.FID39756	WG	1% 10 Net 30	04/02/2024	ULD-2404-0017	Adrienne Spiegel

Item Code	Description	Quantity	Price Each	Amount
Forensic	Forensic - Phone call with Bernie and Adrienne	0.5	250.00	125.00
Forensic	Forensic - RSMF report and Excel report	1	250.00	250.00
	Description:			
	Forensic Collection			
	Sales Tax (8.625%)		8.625%	0.00

	Total	$375.00

Signature:_____ Date:_____

Invoice

United Litigation Discovery Inc
550 California St, Suite 475
San Francisco, CA 94104
Office: 415.999.1335 TIN 46-5681763

UNITED LITIGATION DISCOVERY

Date	Invoice #
1/16/2025	43109

Bill To	Ship To
Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105	Karen Stilber Rosen Bien Galvan & Grunfeld LLP 101 Mission Street, Sixth Floor San Francisco, CA 94105

Billing Reference	Rep	Terms	Ordered Date	Job#	Ordered By
1457-1	WG	1% 10 Net 30	01/13/2025	ULD-2501-0085	Karen Stilber

Item Code	Description	Quantity	Price Each	Amount
B&W with Assem...	Print B&W with Assembly	6,495	0.12	779.40
Color	Color Print	1,673	0.85	1,422.05
Number Tab	Number Tab	100	0.50	50.00
High Number Tab	High Number Tab	139	0.65	90.35
Electronic Label	Electronic Label (For Photos only)	684	0.02	13.68
Tech Time	Technical Time for stamping	16	75.00	1,200.00
4" Binder	4" Binder	11	15.00	165.00
5" Binder	5" Binder	1	20.60	20.60
	Description: Stamp & Print x1 Single Sided Side number tabs per document White binder, up to 5 inches B&W except photos For any voluminous exhibits (over 500 pages), please only print the cover page			
	Sales Tax (8.625%)		8.625%	217.99

Mail payments to:	ACH payment: Wells Fargo	Total	$3,959.07
United Litigation Discovery Inc. 550 California St, Suite 475 San Francisco, CA 94104	Bank Routing Number: 121042882 Account Number: 6044952866 Email: accounting@unitedlit.com		

Signature:_____ Date:_____

FedEx Office

1440 South E St Ste B
San Bernardino, CA, 92408
(909) 381-6282

Terminal: 5201M600MIX02
4/4/2024 11:54
Receipt #: 520181D5830
Type: Purchase

Qty	Description	Amount
4	PNG Color S/S 8.5x11 & 8.5x14	2.96
8	PNG B&W S/S 8.5x11 & 8.5x14	1.60
16	PNG B&W S/S 8.5x11 & 8.5x14	3.20
8	PNG B&W S/S 8.5x11 & 8.5x14	1.60
18	PNG B&W S/S 8.5x11 & 8.5x14	3.60

SubTotal	12.96
District tax	0.19
City tax	0.00
County tax	0.16
State tax	0.78
Total	USD $14.09

Acct #:**********3767
CHASE VISA
Contactless
Auth No.: 01783D
Mode: Issuer
AID: A0000000031010
NO CVM
CVM Result:
TVR: 0000000000
IAD: 06021203A00000
TSI:
ARC: 00
APPROVED

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

FedEx Office

Tell us how we did and get $7 off your next purchase of $40 or more print products*

Take the survey by scanning the QR code below or visit www.fedex.com/welisten

Offer expires 6/30/2024

*Terms & Conditions
$7 off print order of $40.00 or more. Discount applie orders placed in a FedEx Office® store or online thr Office.FedEx.com. Offer is valid at time of purchase no cash value and may not be discounted or cre toward past or future purchases; discount cannot be u combination with custom-bid orders, other coupo discounts, including account pricing. Discount not valid following products and services: finishing-only orders; passport or mounted photo; self-service print, fax, s shred; products provided by third party sites not by FedEx Office. Does not apply to packing, sh rush, or delivery charges. Does not apply to retail p No cash value. Offer void where prohibited or re by law. Products, services, and hours may v location. TM use promo SKU 40269 for Business Services such as FPM. © 2023 FedEx. All rights r

By submitting your project to FedEx Office or by making a purchase in a FedEx Office store, you agree to all FedEx Office terms and conditions, including limitations of liability.

Request a copy of our terms and conditions from a team member or visit **fedex.com/officeserviceterms** for details

FedEx Office

1440 South E St Ste B
San Bernardino, CA, 92408
(909) 381-6282

Terminal: 5201M600MIX02
4/4/2024 11:54
Receipt #: 520181D5830
Type: Purchase

Qty	Description	Amount
4	PNG Color S/S 8.5x11 & 8.5x14	2.96
8	PNG B&W S/S 8.5x11 & 8.5x14	1.60
16	PNG B&W S/S 8.5x11 & 8.5x14	3.20
8	PNG B&W S/S 8.5x11 & 8.5x14	1.60
18	PNG B&W S/S 8.5x11 & 8.5x14	3.60

SubTotal	12.96
District tax	0.19
City tax	0.00
County tax	0.16
State tax	0.78
Total	USD $14.09

Acct #:**********3767
CHASE VISA
Contactless
Auth No.: 01783D
Mode: Issuer
AID: A0000000031010
NO CVM
CVM Result:
TVR: 0000000000
IAD: 06021203A00000
TSI:
ARC: 00
APPROVED

The Cardholder agrees to pay the Issuer of the charge card in accordance with the agreement between the Issuer and the Cardholder.

FedEx Office

Tell us how we did and get $7 off your next purchase of $40 or more print products*

Take the survey by scanning the QR code below or visit www.fedex.com/welisten

Offer expires 6/30/2024

*Terms & Conditions
$7 off print order of $40.00 or more. Discount applie orders placed in a FedEx Office® store or online thr Office.FedEx.com. Offer is valid at time of purchase no cash value and may not be discounted or cre toward past or future purchases; discount cannot be u combination with custom-bid orders, other coupo discounts, including account pricing. Discount not valid following products and services: finishing-only orders; passport or mounted photo; self-service print, fax, s shred; products provided by third party sites not by FedEx Office. Does not apply to packing, sh rush, or delivery charges. Does not apply to retail p No cash value. Offer void where prohibited or re by law. Products, services, and hours may v location. TM use promo SKU 40269 for Business Services such as FPM. © 2023 FedEx. All rights r

By submitting your project to FedEx Office or by making a purchase in a FedEx Office store, you agree to all FedEx Office terms and conditions, including limitations of liability.

Request a copy of our terms and conditions from a team member or visit **fedex.com/officeserviceterms** for details

From: Karen Stilber
To: Millie Topui
Subject: Check request
Date: Wednesday, May 31, 2017 12:32:20 PM
Attachments: Rosen-Bien.Response.May.pdf

Hi, Millie. Can you have a check issued as follows:

Amount: $18.80

Payable To: City of Santa Rosa

For: Records from Santa Rosa PD per PRA request. Our file 1457-1

See attached letter. I will send the check along with a cover letter.

Karen Stilber
Paralegal
ROSEN BIEN GALVAN & GRUNFELD LLP
50 Fremont Street, 19th Floor
San Francisco, CA 94105
(415) 433-6830 (telephone)
(415) 433-7104 (fax)
kstilber@rbgg.com

CONFIDENTIALITY NOTICE
The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at rbg@rbg-law.com.
IRS CIRCULAR 230 NOTICE: As required by United States Treasury Regulations, you should be aware that this communication is not intended by the sender to be used, and it cannot be used, for the purpose of avoiding penalties under United States federal tax laws.

To: Accounting <Accounting@rbgg.com>
Cc: Kira Hansen <KHansen@rbgg.com>
Subject: 1457-1: Check Request

Hello,

At your earliest convenience, can you please create a check for the amount of $10.00 made payable to "San Ramon Valley Fire", at the below address:

2401 Crow Canyon Road, Suite A
San Ramon, CA 94583

This is for matter 1457-1. I would like to send the check myself with a cover letter, so please do not send the check directly to the address. Please let me know if you need anything additional.

Best,

Darcy Edmundson
Paralegal Clerk
she/her

ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, 6th Floor
San Francisco, CA 94105
(415) 433-6830 x109 (main)
(415) 433-7104 (fax)
dedmundson@rbgg.com

CONFIDENTIALITY NOTICE: The information contained in this e-mail message may be privileged, confidential and protected from disclosure. If you are not the intended recipient, any dissemination, distribution or copying is strictly prohibited. If you think that you have received this e-mail message in error, please e-mail the sender at dedmundson@rbgg.com.

FW: Your Receipt

Kira Hansen <KHansen@rbgg.com>
Tue 6/4/2024 4:25 PM

To:Accounting <Accounting@rbgg.com>
Cc:Darcy Edmundson <DEdmundson@rbgg.com>

Receipt on my Amex for the production of public records from the Scotts Valley Fire District for 1457-1. Thanks!

Kira Hansen
Firm Administrator
ROSEN BIEN GALVAN & GRUNFELD LLP
101 Mission Street, Sixth Floor
San Francisco, CA 94105
(415) 433-6830 telephone
(415) 433-7104 facsimile

-----Original Message-----
From: support@pointandpay.com <support@pointandpay.com>
Sent: Tuesday, June 4, 2024 2:23 PM
To: Kira Hansen <KHansen@rbgg.com>
Subject: Your Receipt

[EXTERNAL MESSAGE NOTICE]

Greetings,

Scotts Valley F P D thanks you for your payment. For questions about your account, please call 831-438-0211

Your payment ID is: 157148230

Items Paid For:

Description: Other
Amount Paid: $50.00
First and Last Name: Adrienne Spiegel
Customer Information:

First Name: Kira
Last Name: Hansen
Address Line 1: 101 Mission St
Address Line 2:
City: San Francisco
State: California
Zip Code: 94105

Phone Number: 4154336830
Email Address: khansen@rbgg.com

Payment Information:

Subtotal: $50.00
Fee Total: $2.00
Total: $52.00
Datetime: 06/04/2024 14:23:19