

EXHIBIT A

Timekeeper Nickname 1	Transaction Date	Time Spent (optional row)	Rate	Value	Slip Value	Description
Kelly Knapp	12/21/2016	0.00	\$925.00	\$925.00		Case development - review cases re UCL and emailed co-counsel re same
Kelly Knapp	12/21/2016	2.10	\$925.00	\$1,942.50		Case Development - legal research re neglect and elder abuse and staffing
Kelly Knapp	12/29/2016	0.40	\$925.00	\$370.00		Case Development - legal research re causation and elder abuse and understaffing
Kelly Knapp	1/9/2017	2.10	\$925.00	\$1,942.50		Case Development - legal research re abatement
Kelly Knapp	1/10/2017	1.00	\$925.00	\$925.00		Case Development - conference call with possible expert
Kelly Knapp	1/17/2017	1.50	\$925.00	\$1,387.50		Case Development - conference call with president of Family Council at Brookdale facility
Kelly Knapp	1/18/2017	0.50	\$925.00	\$462.50		Case Development - draft email to family member re follow-up info needed, and drafted memo re phone call
Kelly Knapp	1/19/2017	2.10	\$925.00	\$1,942.50		Case Development - legal research re staffing and elder abuse
Kelly Knapp	1/26/2017	3.00	\$925.00	\$3,607.50		Case Development - legal research and drafted memo re injunctive relief
Kelly Knapp	1/27/2017	3.10	\$925.00	\$2,867.50		Case Development - research re regulatory oversight
Kelly Knapp	1/31/2017	1.00	\$925.00	\$1,157.50		Case Development - research relevant regulations and drafted PRA request to DSS
Kelly Knapp	2/2/2017	0.20	\$925.00	\$185.00		Drafted PRA request, email S. Colby re same
Kelly Knapp	2/24/2017	0.10	\$925.00	\$92.50		Conference call with S. Colby re client interviews and retainer
Kelly Knapp	3/1/2017	0.30	\$925.00	\$277.50		Reviewed/edited demand letter
Kelly Knapp	3/2/2017	7.50	\$925.00	\$6,937.50		Travel to/from and meeting with co-counsel and potential class representatives
Kathryn Stebner	3/4/2017	0.50	\$1,300.00	\$650.00		Review CLRA letter
Kelly Knapp	3/4/2017	0.10	\$925.00	\$92.50		Email to co-counsel re client interviews
Kelly Knapp	3/7/2017	0.50	\$925.00	\$462.50		Conference call with potential named plaintiff
Kelly Knapp	3/7/2017	0.50	\$925.00	\$462.50		Draft memo re client interview
Kelly Knapp	3/8/2017	0.30	\$925.00	\$277.50		Conference call with Brookdale residents re conditions at facility
Kelly Knapp	3/8/2017	0.20	\$925.00	\$185.00		Draft memo re client interview
Kelly Knapp	3/8/2017	1.20	\$925.00	\$1,110.00		Conference call with Brookdale residents and drafted memos re same
Kelly Knapp	3/8/2017	0.10	\$925.00	\$92.50		Conference call with potential client re conditions at Brookdale facility
Kelly Knapp	3/14/2017	0.60	\$925.00	\$555.00		Interviewed witness and drafted memo re same
Kelly Knapp	3/31/2017	0.30	\$925.00	\$277.50		Conference call with K. Stebner re demand letter and settlement
Kathryn Stebner	3/31/2017	0.30	\$1,300.00	\$390.00		Conference call with K. Knapp re demand letter and settlement
Kelly Knapp	4/4/2017	0.20	\$925.00	\$185.00		Meet w/ K. Stebner to discuss settlement strategy
Kelly Knapp	4/4/2017	0.10	\$925.00	\$92.50		Conference call with K. Stebner and co-counsel re settlement options
Kathryn Stebner	4/6/2017	0.50	\$1,300.00	\$650.00		Conference call with K. Knapp and co-counsel re settlement options
Kelly Knapp	4/13/2017	0.40	\$925.00	\$370.00		Conference call with S. Colby re ADA claims
Kelly Knapp	4/13/2017	0.30	\$925.00	\$277.50		Meet with K. Stebner to prepare for settlement meeting
Kathryn Stebner	4/13/2017	0.30	\$1,300.00	\$390.00		Meet with K. Knapp to prepare for settlement meeting
Kelly Knapp	4/14/2017	1.20	\$925.00	\$1,110.00		Phone Calls w/ G. Wallace, S. Colby, and K. Stebner re ADA claims
Kathryn Stebner	4/14/2017	0.40	\$1,300.00	\$520.00		Phone call with K. Knapp re ADA claim
Kelly Knapp	4/18/2017	0.70	\$925.00	\$647.50		Travel to/from and meeting with co-counsel re possible
Kelly Knapp	4/19/2017	0.40	\$925.00	\$370.00		Emails with co-counsel re CLRA claims
Kelly Knapp	4/19/2017	0.20	\$925.00	\$185.00		Phone call with K. Stebner to discuss possible co-counsel arrangement and claims
Kathryn Stebner	4/19/2017	0.20	\$1,300.00	\$260.00		Phone call with K. Knapp to discuss possible co-counsel arrangement and claims
Kelly Knapp	4/20/2017	0.70	\$925.00	\$647.50		Legal research re damages, and emails re same to co-counsel
Kelly Knapp	4/20/2017	1.50	\$925.00	\$1,387.50		Conference call with co-counsel and Ombudsman, and follow-up call w/ co-counsel
Kathryn Stebner	4/20/2017	1.00	\$1,300.00	\$1,300.00		Conference call with co-counsel and Ombudsman
Kelly Knapp	4/21/2017	0.40	\$925.00	\$370.00		Email correspondence to/from co-counsel re staffing
Kelly Knapp	4/24/2017	0.40	\$925.00	\$370.00		Conference call with co-counsel re staffing expert
Kelly Knapp	4/24/2017	0.40	\$925.00	\$370.00		Phone call with potential staffing expert, and follow-up email re same
Kathryn Stebner	4/24/2017	0.40	\$1,300.00	\$520.00		Phone call with K. Knapp and potential staffing expert
Kelly Knapp	4/24/2017	0.50	\$925.00	\$462.50		Phone call with resident re potential access claim
Kelly Knapp	4/24/2017	0.40	\$925.00	\$370.00		Conference call with co-counsel re phone call with resident re potential access claim
Kelly Knapp	4/25/2017	0.50	\$925.00	\$462.50		Draft letter to DSS re missing records
Kelly Knapp	4/25/2017	0.20	\$925.00	\$185.00		Legal research re ADA
Kelly Knapp	4/25/2017	1.20	\$925.00	\$1,110.00		Interview potential class representative and draft email to file re same
Kelly Knapp	4/25/2017	0.90	\$925.00	\$832.50		Legal research re surcharges
Kelly Knapp	4/26/2017	0.30	\$925.00	\$277.50		Conference call with potential class representative, drafted follow-up email to co-counsel re same
Kelly Knapp	4/26/2017	0.30	\$925.00	\$277.50		Research re staffing plans
Kelly Knapp	4/26/2017	0.60	\$925.00	\$555.00		Conference call with consultant re staffing plans
Kelly Knapp	4/26/2017	0.00	\$925.00	\$0.00		Drafted memo to team re consultant's recommendations, reviewed consultant's articles, re staffing plans
Kathryn Stebner	4/26/2017	5.00	\$1,300.00	\$6,500.00		Meeting with Tim Casar at Schneider Wallace
Kelly Knapp	4/27/2017	0.10	\$925.00	\$92.50		Reviewed email from consultant re staffing standards
Kelly Knapp	4/27/2017	0.90	\$925.00	\$832.50		Conference call with co-counsel re settlement and experts
Kelly Knapp	4/27/2017	0.20	\$925.00	\$185.00		Draft memo to potential consultant re staffing
Kelly Knapp	4/27/2017	0.20	\$925.00	\$185.00		Draft email to potential expert re staffing
Kelly Knapp	4/28/2017	0.80	\$925.00	\$740.00		Email to G. Wallace re staffing
Kelly Knapp	4/28/2017	0.30	\$925.00	\$277.50		Phone call with consultant re staffing best practices
Kelly Knapp	4/28/2017	0.20	\$925.00	\$185.00		Conference call with CANHR re staffing theories
Kathryn Stebner	4/28/2017	0.50	\$1,300.00	\$650.00		Conference call with CANHR re staffing theories
Kelly Knapp	4/28/2017	0.30	\$925.00	\$277.50		Conference call with S. Colby re staffing theories
Kelly Knapp	4/28/2017	0.20	\$925.00	\$185.00		Draft email to potential expert re staffing theories
Kelly Knapp	4/28/2017	0.40	\$925.00	\$370.00		Draft memo summarizing phone interview with resident
Kelly Knapp	4/28/2017	0.60	\$925.00	\$555.00		Email to CANHR re staffing standards
Kelly Knapp	5/1/2017	0.10	\$925.00	\$92.50		Emails to potential experts re staffing theories
Kelly Knapp	5/1/2017	1.00	\$925.00	\$925.00		Conference call with co-counsel re case strategy
Kathryn Stebner	5/1/2017	0.50	\$1,300.00	\$650.00		Conference call with co-counsel re case strategy
Kelly Knapp	5/2/2017	0.10	\$925.00	\$92.50		Email to consultants re staffing theories
Kelly Knapp	5/3/2017	0.20	\$925.00	\$185.00		Email to consultant re staffing
Kelly Knapp	5/4/2017	0.80	\$925.00	\$740.00		Conference call with consultant re staffing theories
Kelly Knapp	5/4/2017	0.10	\$925.00	\$92.50		Conference call with S. Colby re potential new class representative
Kelly Knapp	5/4/2017	0.50	\$925.00	\$462.50		Phone call with potential class representative
Kelly Knapp	5/4/2017	0.10	\$925.00	\$92.50		Email to S. Colby re phone call with potential class representative
Kelly Knapp	5/5/2017	0.70	\$925.00	\$647.50		Conference call with S. Colby and consultant re staffing theories
Kelly Knapp	5/5/2017	0.10	\$925.00	\$92.50		Email to consultant re staffing theories
Kelly Knapp	5/10/2017	0.30	\$925.00	\$277.50		Legal research re PRA request
Kathryn Stebner	5/10/2017	0.50	\$1,300.00	\$650.00		Telephone call with G. Wallace and G. Gruenfeld re case/claims analysis
Kelly Knapp	5/11/2017	0.10	\$925.00	\$92.50		Review news articles re plans to sell Brookdale facilities
Kelly Knapp	5/15/2017	0.10	\$925.00	\$92.50		Review conference call with DSS-CCL (Community Care Licensing) re PRA request
Kelly Knapp	5/15/2017	0.10	\$925.00	\$92.50		Review potential expert's published articles
Kelly Knapp	5/17/2017	0.30	\$925.00	\$277.50		Draft memos re potential experts
Kelly Knapp	5/17/2017	2.10	\$925.00	\$1,942.50		Travel to/from and meeting with co-counsel re complaint
Kelly Knapp	5/18/2017	0.30	\$925.00	\$277.50		Review memos and draft emails to co-counsel re class representative and experts
Kelly Knapp	5/22/2017	0.10	\$925.00	\$92.50		Review article sent from co-counsel and draft email in response re case strategy
Kelly Knapp	5/22/2017	0.30	\$925.00	\$277.50		Conference call with K. Stebner re complaint
Kathryn Stebner	5/22/2017	0.30	\$1,300.00	\$390.00		Conference call with K. Knapp re complaint
Kelly Knapp	5/23/2017	0.10	\$925.00	\$92.50		Conference call with co-counsel re resident fall at targeted facility
Kelly Knapp	5/24/2017	0.10	\$925.00	\$92.50		Review article re short staffing in Santa Cruz re similar allegations in Brookdale
Kelly Knapp	5/24/2017	0.50	\$925.00	\$462.50		Travel to/from re elder abuse claim
Kelly Knapp	5/24/2017	3.00	\$925.00	\$2,775.00		Travel to/from and meeting with potential class representative at San Ramon facility
Kelly Knapp	5/25/2017	0.50	\$925.00	\$462.50		Editorial/revisions re CLRA letter
Kelly Knapp	5/25/2017	2.70	\$925.00	\$2,497.50		Legal research and memo re elder abuse claim
Kelly Knapp	5/26/2017	0.90	\$925.00	\$832.50		Draft complaint
Kelly Knapp	5/26/2017	2.10	\$925.00	\$1,942.50		Draft complaint
Kelly Knapp	5/31/2017	1.10	\$925.00	\$1,017.50		Draft complaint
Kathryn Stebner	6/6/2017	1.00	\$1,300.00	\$1,300.00		Meet with internal team re call with G. Gruenfeld and contract, review contracts and emails
Kathryn Stebner	6/6/2017	0.50	\$1,300.00	\$650.00		Call with G. Gruenfeld re contract
Kelly Knapp	6/12/2017	0.30	\$925.00	\$277.50		Review emails from co-counsel re potential class representatives
Kelly Knapp	6/13/2017	0.20	\$925.00	\$185.00		Email to class representative re case investigation and fact inquiries
Kelly Knapp	6/13/2017	0.20	\$925.00	\$185.00		Conference call with named plaintiff re case investigation and fact development
Kelly Knapp	6/13/2017	0.30	\$925.00	\$277.50		Draft letter to DSS-CCL (Community Care Licensing) re PRA request
Kelly Knapp	6/15/2017	1.00	\$925.00	\$925.00		Conference call with daughter of potential class representative re fact development
Kelly Knapp	6/15/2017	0.50	\$925.00	\$462.50		Email/memo to file re conference call with daughter of potential class representative re fact development
Kelly Knapp	6/15/2017	0.10	\$925.00	\$92.50		Conference call with co-counsel re complaint status
Kelly Knapp	6/15/2017	0.50	\$925.00	\$462.50		Legal research re liability after merger and/or acquisitions
Kelly Knapp	6/16/2017	0.70	\$925.00	\$647.50		Legal research re injunction after acquisition
Kelly Knapp	6/16/2017	0.10	\$925.00	\$92.50		Legal research re acquisition
Kelly Knapp	6/16/2017	0.70	\$925.00	\$647.50		Legal research re successor liability and injunctions
Kelly Knapp	6/16/2017	1.00	\$925.00	\$925.00		Legal research re successor in interest liability
Kelly Knapp	6/19/2017	1.10	\$925.00	\$1,017.50		Draft memo re successor liability
Kelly Knapp	6/19/2017	0.50	\$925.00	\$462.50		Review operative draft complaint
Kelly Knapp	6/19/2017	0.10	\$925.00	\$92.50		Conference call with co-counsel re emergency evacuation plan
Kelly Knapp	6/19/2017	0.60	\$925.00	\$555.00		Memo re meeting with named plaintiff
Kelly Knapp	6/20/2017	0.20	\$925.00	\$185.00		Review operative draft of complaint
Kelly Knapp	6/20/2017	0.30	\$925.00	\$277.50		Conference call with co-counsel re draft complaint status
Kathryn Stebner	6/20/2017	0.30	\$1,300.00	\$390.00		Conference call with co-counsel re draft complaint status
Kelly Knapp	6/21/2017	0.30	\$925.00	\$277.50		Prepare for client interview
Kelly Knapp	6/21/2017	3.80	\$925.00	\$3,515.00		Travel to/from, and meeting with G. Wallace and named plaintiff
Kelly Knapp	6/26/2017	0.10	\$925.00	\$92.50		Email to team re draft complaint
Kelly Knapp	6/26/2017	0.40	\$925.00	\$370.00		Email to team re procedural declarations for complaint
Kelly Knapp	6/26/2017	0.20	\$925.00	\$185.00		Conference call with S. Colby re draft complaint
Kelly Knapp	6/27/2017	0.20	\$925.00	\$185.00		Review operative draft complaint
Kelly Knapp	6/28/2017	0.10	\$925.00	\$92.50		Review G. Wallace email re draft complaint and draft complaint
Kelly Knapp	6/28/2017	1.00	\$925.00	\$925.00		Conference call with co-counsel re complaint
Kelly Knapp	6/29/2017	1.00	\$925.00	\$925.00		Review and edit draft complaint
Kelly Knapp	6/29/2017	0.20	\$925.00	\$185.00		Conference call with G. Wallace and S. Colby re draft complaint
Kelly Knapp	6/30/2017	7.10	\$925.00	\$6,567.50		Review/revise operative draft of Brookdale complaint
Kelly Knapp	6/30/2017	5.10	\$925.00	\$4,717.50		Draft/revise operative draft of complaint
Kathryn Stebner	6/30/2017	0.40	\$1,300.00	\$520.00		Emails with co-counsel re defense counsel
Kelly Knapp	7/1/2017	0.60	\$925.00	\$555.00		Edit draft complaint
Kelly Knapp	7/3/2017	0.20	\$925.00	\$185.00		Email to co-counsel re operative draft complaint
Kelly Knapp	7/6/2017	0.80	\$925.00	\$740.00		Travel to/from meeting with co-counsel re draft complaint
Kelly Knapp	7/6/2017	3.00	\$925.00	\$2,775.00		Meeting with co-counsel re draft complaint
Kelly Knapp	7/7/2017	0.40	\$925.00	\$370.00		Review memo from co-counsel re ADA fees
Kelly Knapp	7/11/2017	0.20	\$925.00	\$185.00		Review operative draft complaint
Kelly Knapp	7/13/2017	0.20	\$925.00	\$185.00		Review draft complaint and email S. Colby re same
Kelly Knapp	7/13/2017	0.30	\$925.00	\$277.50		Phone call with S. Colby witness re staffing and email re same
Kelly Knapp	7/13/2017	0.80	\$925.00	\$740.00		Phone call with percipient witness re staffing
Kelly Knapp	7/13/2017	0.30	\$925.00	\$277.50		Email/memo to co-counsel re phone call with percipient witness re staffing
Kelly Knapp	7/17/2017	0.20	\$925.00	\$185.00		Review emails from team re filed complaint
Kelly Knapp	7/20/2017	0.90	\$925.00	\$832.50		Phone call with witness re staffing and disability access
Kelly Knapp	7/25/2017	0.40	\$925.00	\$370.00		Memo re phone call with percipient witness re staffing and disability access
Kelly Knapp	7/26/2017	0.20	\$925.00	\$185.00		Phone call with potential class representative
Kelly Knapp	8/1/2017	0.50	\$925.00	\$462.50		Conference call with Brookdale residents re dramatic rate increase
Kelly Knapp	8/4/2017	0.20	\$925.00	\$185.00		Review/comment re draft of presentation letter
Kelly Knapp	8/4/2017	2.70	\$925.00	\$2,497.50		Travel to/from meeting with co-counsel re litigation/discovery strategy
Kelly Knapp	8/4/2017	0.50	\$925.00	\$462.50		Meeting with co-counsel re litigation/discovery strategy
Kelly Knapp	8/6/2017	0.30	\$925.00	\$277.50		Investigate potential expert testimony re conduct to prepare for injunctive relief
Kelly Knapp	8/9/2017	0.20	\$925.00	\$185.00		Email to DSS-CCL (Community Care Licensing) re PRA request
Kelly Knapp	8/9/2017	0.90	\$925.00	\$832.50		Investigate potential experts and theories for injunctive relief
Kelly Knapp	8/10/2017	3.20	\$925.00	\$2,960.00		Investigate potential expert testimony re forms of injunctive relief
Kelly Knapp	8/11/2017	0.60	\$925.00	\$555.00		Draft memo re putative class member interview
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Kelly Knapp	8/11/2017	0.20	\$925.00	\$185.00	Phone call with percipient witness re staffing at Brookdale
Kelly Knapp	8/11/2017	0.40	\$925.00	\$370.00	Email to co-counsel summarizing witness interview
Kelly Knapp	8/14/2017	1.10	\$925.00	\$1,017.50	Phone call with percipient witness re staffing at Brookdale Santa Rosa
Kelly Knapp	8/16/2017	0.10	\$925.00	\$92.50	Review correspondence from percipient witness re staffing at Brookdale Santa Rosa
Kelly Knapp	8/16/2017	0.20	\$925.00	\$185.00	Phone call with percipient witness re staffing Brookdale
Kelly Knapp	8/16/2017	0.10	\$925.00	\$92.50	Draft letter to percipient witness re staffing related follow up questions
Kelly Knapp	8/16/2017	0.20	\$925.00	\$185.00	Email to co-counsel re form of class representative contract
Kelly Knapp	8/17/2017	0.20	\$925.00	\$185.00	Phone call with Brookdale resident re poor food quality in facility
Kelly Knapp	8/18/2017	0.40	\$925.00	\$370.00	Research potential staffing expert
Kelly Knapp	8/21/2017	0.20	\$925.00	\$185.00	Phone call with Brookdale resident re staffing at facility
Kelly Knapp	9/5/2017	0.10	\$925.00	\$92.50	Review Brookdale survey sent to clients
Kelly Knapp	9/6/2017	0.90	\$925.00	\$832.50	Potential expert research - background and available opinions
Kelly Knapp	9/11/2017	0.20	\$925.00	\$185.00	Prepare for meeting re experts
Kelly Knapp	9/11/2017	1.80	\$925.00	\$1,660.00	Travel to/from meeting with co-counsel re experts and class certification
Kelly Knapp	9/11/2017	0.50	\$925.00	\$462.50	Meeting with co-counsel re experts and class certification
Kelly Knapp	9/13/2017	0.10	\$925.00	\$92.50	Legal research re witness affidavits
Kelly Knapp	9/13/2017	0.20	\$925.00	\$177.50	Phone call with percipient witness re staffing
Kelly Knapp	9/13/2017	1.20	\$925.00	\$1,110.00	Legal research re discovery of witness declarations
Kelly Knapp	9/14/2017	0.20	\$925.00	\$185.00	Memo to K. Stebner re current status of case
Kelly Knapp	9/14/2017	0.20	\$925.00	\$185.00	Review case law sent from S. Colby re whether declarations are discoverable
Kelly Knapp	9/14/2017	0.20	\$925.00	\$185.00	Email requesting available declarations, transcripts re possible expert
Kelly Knapp	9/15/2017	0.80	\$925.00	\$740.00	Conference call with Brookdale resident in Anashim Hills
Kelly Knapp	9/18/2017	0.20	\$925.00	\$185.00	Review emails from co-counsel and respond re witness declarations and discoverability
Kelly Knapp	9/18/2017	1.70	\$925.00	\$1,572.50	Draft class certification witness declaration template
Kathryn Stebner	9/18/2017	0.30	\$1,300.00	\$390.00	Review letter from defense and internal emails re same
Kathryn Stebner	9/19/2017	0.20	\$1,300.00	\$260.00	Phone call with G. Wallace, G. Grunfeld re defense letter and strategy
Kelly Knapp	9/20/2017	1.00	\$925.00	\$925.00	Conference call with potential staffing expert
Kelly Knapp	9/20/2017	0.20	\$925.00	\$177.50	Conference call with S. Colby re staffing expert
Kathryn Stebner	9/23/2017	1.40	\$1,300.00	\$1,820.00	Review expert deposition transcripts and emails from similar cases - review and send to counsel
Kelly Knapp	9/27/2017	0.10	\$925.00	\$92.50	Prepare or call with consulting expert
Kelly Knapp	9/27/2017	0.20	\$925.00	\$185.00	Conference call consulting expert re HSD time for task
Kelly Knapp	9/28/2017	0.00	\$925.00	\$925.00	Review motion to dismiss, strike, arbitrate
Kathryn Stebner	9/29/2017	1.80	\$1,300.00	\$2,340.00	Read and analyze defendant's motions (strike, dismiss, arbitrate)
Kathryn Stebner	9/29/2017	0.20	\$1,300.00	\$260.00	Internal emails with K. Knapp re defendants' motions to dismiss, strike, arbitrate
Kathryn Stebner	9/29/2017	0.40	\$1,300.00	\$520.00	Call with K. Knapp re defendants' motions (strike, dismiss, arbitrate)
Kelly Knapp	10/2/2017	0.60	\$925.00	\$555.00	Prepare for meeting with Co-Counsel re pending motions to dismiss, strike, arbitrate
Kelly Knapp	10/2/2017	1.50	\$925.00	\$1,387.50	Travel to/from and meeting with co-counsel re pending motions
Kelly Knapp	10/2/2017	0.50	\$925.00	\$462.50	Meeting with co-counsel re defendants' motions to dismiss, strike, arbitrate
Kelly Knapp	10/2/2017	0.80	\$925.00	\$740.00	Draft requests request letter for potential class representatives and review co-counsel's research memo re same
Kelly Knapp	10/2/2017	0.90	\$925.00	\$832.50	Legal research to support opposition to motion to dismiss
Kathryn Stebner	10/2/2017	1.50	\$1,300.00	\$1,950.00	Review defendants' motions (strike, dismiss, arbitrate) to prepare for meeting
Kelly Knapp	10/2/2017	4.10	\$925.00	\$3,792.50	Research and drafting of opposition to motion to dismiss
Kelly Knapp	10/4/2017	0.70	\$925.00	\$647.50	Draft next section of opposition to motion to dismiss
Kelly Knapp	10/5/2017	0.20	\$925.00	\$185.00	Review stipulation re extension of time on defendants' motions and email to team re same
Kelly Knapp	10/6/2017	0.60	\$925.00	\$555.00	Legal research re opposition to motion to dismiss
Kelly Knapp	10/6/2017	0.20	\$925.00	\$177.50	Phone call with Brookdale resident re arbitration and admission contract
Kelly Knapp	10/6/2017	0.90	\$925.00	\$832.50	Conference call with consulting expert and co-counsel
Kelly Knapp	10/10/2017	0.20	\$925.00	\$185.00	Phone call with percipient witness re staffing at Brookdale
Kelly Knapp	10/10/2017	0.20	\$925.00	\$185.00	Legal research on preclusive effect of release of claims
Kathryn Stebner	10/10/2017	0.60	\$1,300.00	\$780.00	Call with K. Knapp re opposition to defendants' dispositive motions, arbitration strategy
Kelly Knapp	10/10/2017	0.40	\$925.00	\$370.00	Phone call with K. Stebner re oppositions to motions to dismiss, strike, arbitrate
Kelly Knapp	10/11/2017	0.20	\$925.00	\$185.00	Phone call with S. Colby and G. Wallace re oppositions to motions to dismiss and to strike
Kelly Knapp	10/11/2017	0.20	\$925.00	\$185.00	Phone call with Chris Hu re opposition to motion to dismiss
Kelly Knapp	10/11/2017	0.20	\$925.00	\$185.00	Further phone call with Chris Hu re opposition to motion to dismiss
Kelly Knapp	10/11/2017	9.90	\$925.00	\$9,157.50	Draft opposition to motion to dismiss
Kelly Knapp	10/12/2017	3.90	\$925.00	\$3,607.50	Draft opposition to motion to dismiss
Kelly Knapp	10/12/2017	0.50	\$925.00	\$462.50	Edits/revisions to portion of opposition to motion to dismiss
Kelly Knapp	10/12/2017	0.40	\$925.00	\$370.00	Draft opposition to motion to dismiss
Kelly Knapp	10/16/2017	0.60	\$925.00	\$555.00	Legal research re release of claims argument re opposition to motion to dismiss
Kelly Knapp	10/16/2017	0.20	\$925.00	\$185.00	Phone call with S. Colby re opposition to motion to dismiss and fact investigation
Kelly Knapp	10/17/2017	0.20	\$925.00	\$185.00	Phone call with Brookdale witness/resident re staffing and arbitration
Kelly Knapp	10/18/2017	0.90	\$925.00	\$832.50	Legal research re settlement releases, and revised opposition
Kelly Knapp	10/18/2017	0.40	\$925.00	\$370.00	Further edits to opposition to motion to dismiss re settlement releases
Kelly Knapp	10/20/2017	0.60	\$925.00	\$555.00	Revisions to opposition to motion to dismiss
Kelly Knapp	10/23/2017	0.40	\$925.00	\$370.00	Revisions to opposition to motion to dismiss
Kelly Knapp	10/24/2017	0.40	\$925.00	\$370.00	Phone call with Brookdale resident / witness re arbitration
Kelly Knapp	10/25/2017	0.20	\$925.00	\$185.00	Further revisions to opposition to motion to dismiss
Kathryn Stebner	10/25/2017	0.30	\$1,300.00	\$390.00	Review internal emails and set meeting re briefing schedule
Kathryn Stebner	10/25/2017	0.40	\$1,300.00	\$520.00	Call with K. Knapp re briefing schedule and opposition to motion to dismiss
Kelly Knapp	10/26/2017	0.60	\$925.00	\$555.00	Conference call with co-counsel re arbitration and potential new plaintiffs
Kelly Knapp	10/26/2017	0.40	\$925.00	\$370.00	Phone call with S. Colby and G. Wallace re release of all claims argument
Kathryn Stebner	10/26/2017	0.60	\$1,300.00	\$780.00	Call with co-counsel re status/strategy re arbitration and new plaintiffs
Kathryn Stebner	10/26/2017	0.70	\$1,300.00	\$910.00	Review internal emails and meet with K. Knapp in advance of call with co-counsel re oppositions to defendants' motions (strike, dismiss, arbitrate)
Kelly Knapp	10/27/2017	1.30	\$925.00	\$1,202.50	Further revisions and edits to oppositions to motion to dismiss
Kelly Knapp	10/28/2017	0.10	\$925.00	\$82.50	Draft opposition to motion to dismiss
Kelly Knapp	10/30/2017	1.40	\$925.00	\$1,295.00	Draft opposition to motion to dismiss
Kelly Knapp	10/31/2017	1.30	\$925.00	\$1,202.50	Edits/revisions to discrete sections of opposition to motion to dismiss
Kelly Knapp	11/1/2017	0.10	\$925.00	\$92.50	Email to co-counsel re opposition to motion to dismiss
Kelly Knapp	11/2/2017	0.20	\$925.00	\$185.00	Review operative draft of opposition to motion to dismiss
Kelly Knapp	11/6/2017	0.20	\$925.00	\$185.00	Review operative drafts of opposition briefs and email comments to team re same
Kathryn Stebner	11/6/2017	0.30	\$1,300.00	\$390.00	Review internal emails re oppositions to defendants' motions (strike, dismiss, arbitrate) and review filings
Kelly Knapp	11/16/2017	0.20	\$925.00	\$185.00	Travel time to/from, and meeting w/ expert and co-counsel
Kelly Knapp	12/1/2017	2.50	\$925.00	\$2,312.50	Strategy meeting with co-counsel and expert
Kelly Knapp	12/1/2017	0.20	\$925.00	\$185.00	Email to team re investigator update
Kelly Knapp	12/1/2017	0.20	\$925.00	\$185.00	Phone call with team re potential named plaintiff
Kelly Knapp	12/7/2017	0.40	\$925.00	\$370.00	Conference call with team re potential named plaintiff for arbitration purposes
Kelly Knapp	12/8/2017	0.60	\$925.00	\$555.00	Review defendants' reply briefs supporting motions to dismiss, strike, arbitrate
Kelly Knapp	12/12/2017	0.10	\$925.00	\$92.50	Review potential plaintiff's admission contract
Kelly Knapp	12/13/2017	0.30	\$925.00	\$277.50	Phone call with potential class rep re arbitration
Kelly Knapp	12/13/2017	0.80	\$925.00	\$740.00	Conference call with team re strategy for oral argument on defendants' motions to dismiss, strike, arbitrate
Kathryn Stebner	12/13/2017	0.80	\$1,300.00	\$1,040.00	Conference call with team re strategy for oral argument on defendants' motions to dismiss, strike, arbitrate
Kelly Knapp	12/18/2017	0.70	\$925.00	\$647.50	Conference call with team to discovery and amended complaint
Kelly Knapp	12/19/2017	0.40	\$925.00	\$370.00	Revised Schedule article to prepare for call with expert
Kelly Knapp	12/19/2017	0.30	\$925.00	\$277.50	Conference call with S. Colby and G. Grunfeld re expert studies
Kelly Knapp	12/19/2017	0.30	\$925.00	\$277.50	Research on status of pending Florida case and draft email to team re same
Kelly Knapp	12/20/2017	0.10	\$925.00	\$92.50	Revised SC's memo re expert
Kelly Knapp	12/21/2017	0.50	\$925.00	\$462.50	Update K. Stebner re discussion with staffing experts
Kathryn Stebner	12/21/2017	0.50	\$1,300.00	\$650.00	Meet with K. Knapp re staffing expert discussions
Kelly Knapp	12/21/2017	2.50	\$925.00	\$2,312.50	Draft discovery requests to defendants
Kelly Knapp	12/22/2017	0.10	\$925.00	\$92.50	Review emails from co-counsel re staffing expert
Kelly Knapp	12/22/2017	0.90	\$925.00	\$832.50	Draft discovery requests to defendants
Kelly Knapp	12/26/2017	2.30	\$925.00	\$2,127.50	Draft discovery requests to defendants
Kelly Knapp	1/4/2018	0.30	\$925.00	\$277.50	Read/prepare to emails with co-counsel re amended complaint and discovery
Kelly Knapp	1/8/2018	0.20	\$925.00	\$185.00	Legal research re expert discovery, discovery of experts
Kelly Knapp	1/8/2018	0.40	\$925.00	\$370.00	Conference call plaintiff's attorney in Florida class case against Defendants
Kelly Knapp	1/8/2018	0.20	\$925.00	\$185.00	Draft email to team re discovery update
Kelly Knapp	1/24/2018	0.10	\$925.00	\$92.50	Review and respond to email from co-counsel re arbitration
Kathryn Stebner	2/7/2018	0.30	\$1,300.00	\$390.00	Review Hager letter
Kathryn Stebner	2/8/2018	0.30	\$1,300.00	\$390.00	Review letter and emails re allegations for amended complaint
Kathryn Stebner	2/9/2018	2.40	\$1,300.00	\$2,920.00	Review draft First Amended Complaint and records assignment
Kathryn Stebner	2/12/2018	0.50	\$1,300.00	\$650.00	Review motion for leave to file amended complaint and emails from team re same
Kathryn Stebner	2/15/2018	0.40	\$1,300.00	\$520.00	Review motion to file amended complaint and email correspondence with team re same
Kathryn Stebner	2/20/2018	0.60	\$1,300.00	\$780.00	Call with G. Grunfeld re strategy, next steps after filing amended complaint
Kathryn Stebner	2/20/2018	0.40	\$1,300.00	\$520.00	Emails and call with G. Kawamoto re case assignments and update
Kathryn Stebner	2/22/2018	0.40	\$1,300.00	\$520.00	Emails and call with G. Kawamoto re draft discovery
Kathryn Stebner	2/23/2018	0.40	\$1,300.00	\$520.00	Call with G. Wallace and G. Grunfeld re draft discovery
Kathryn Stebner	2/23/2018	0.70	\$1,300.00	\$910.00	Meeting with G. Kawamoto to review discovery
Kathryn Stebner	2/26/2018	0.40	\$1,300.00	\$520.00	Emails with co-counsel re propounding discovery
Kelly Knapp	3/2/2018	0.20	\$925.00	\$185.00	Draft notice of change of counsel
Kathryn Stebner	3/20/2018	2.00	\$1,300.00	\$2,600.00	Co-counsel meeting with G. Wallace and G. Grunfeld at Schneider Wallace
Kathryn Stebner	3/25/2018	0.80	\$1,300.00	\$1,040.00	Review draft successor in interest declaration, co-counsel edits, complaint, and S. Colby email re same
Kathryn Stebner	3/25/2018	0.20	\$1,300.00	\$260.00	Email to S. Colby re draft successor in interests declaration
Kathryn Stebner	5/16/2018	0.70	\$1,300.00	\$910.00	Meet with B. Umpierre re case overview / assignments
Brian Umpierre	5/16/2018	0.70	\$925.00	\$647.50	Meet with K. Stebner re case overview / assignments
Brian Umpierre	5/16/2018	1.80	\$925.00	\$1,665.00	Review pleadings and motion to dismiss briefing to familiarize self with case in order to respond to putative class member telephone and email inquiries
Brian Umpierre	5/29/2018	0.20	\$925.00	\$185.00	Telephone call with putative class member (MC) - intake, case background and nature of class actions
Brian Umpierre	6/26/2018	0.80	\$925.00	\$740.00	Conference call with co-counsel re case status, strategy, motion to strike class allegations
Kathryn Stebner	7/2/2018	1.30	\$1,300.00	\$1,690.00	Conference call with co-counsel re case status, strategy, HFS class allegations; review pleadings/emails re same.
Kathryn Stebner	7/10/2018	0.70	\$1,300.00	\$910.00	Review email from S. Colby re potential document requests re complaints received from residents
Kathryn Stebner	7/10/2018	0.30	\$925.00	\$277.50	Review draft discovery/document requests
Brian Umpierre	7/10/2018	0.30	\$925.00	\$277.50	Discussion with B. Umpierre re draft discovery requests
Brian Umpierre	7/10/2018	0.30	\$925.00	\$277.50	Case/fact development - review news article re Brookdale corporate options to break up business
Brian Umpierre	8/9/2018	0.40	\$925.00	\$370.00	Discuss draft documents requests with K. Stebner
Kathryn Stebner	8/14/2018	0.40	\$1,300.00	\$520.00	Case/fact development - review news article re Brookdale's sale of assisted living facilities.
Kathryn Stebner	8/20/2018	0.80	\$1,300.00	\$1,040.00	Review news article re current Brookdale AL business status
Brian Umpierre	8/20/2018	0.80	\$925.00	\$740.00	Meet with B. Umpierre re discovery status and CCL records assignment
Brian Umpierre	8/20/2018	2.50	\$925.00	\$2,312.50	Meet with K. Stebner re discovery status and CCL records assignment
Brian Umpierre	8/24/2018	0.50	\$925.00	\$507.50	Case/fact development - CCL record summary (San Ramon, Rockledge)
Kathryn Stebner	8/31/2018	0.60	\$1,300.00	\$780.00	Case/fact development - CCL record summary (San Ramon)
Kathryn Stebner	9/17/2018	0.50	\$1,300.00	\$650.00	Emails with G. Kawamoto re written discovery and case schedule
Brian Umpierre	9/17/2018	0.50	\$925.00	\$462.50	Meetings-communications: conference call among co-counsel re change of ownership.
Brian Umpierre	9/17/2018	1.20	\$925.00	\$1,110.00	Conference call among co-counsel re change of ownership
Brian Umpierre	10/15/2018	0.70	\$925.00	\$647.50	Legal research re required elements of successor in interest declaration; emails with G. Kawamoto re same
Brian Umpierre	10/16/2018	0.70	\$925.00	\$647.50	Telephone call with putative class member / San Ramon resident (DS) re case background, intake, fact development; email summary re same
Brian Umpierre	11/6/2018	0.50	\$925.00	\$462.50	Telephone call with potential class member - intake, case background and nature of class actions
Brian Umpierre	11/6/2018	0.40	\$925.00	\$370.00	Telephone call with putative class member / Scott's Valley resident (JC) re cases background, intake, fact development; email summary re same
Kathryn Stebner	12/12/2018	0.70	\$1,300.00	\$910.00	Meet with S. Colby re case status and strategy
Brian Umpierre	1/7/2019	0.50	\$925.00	\$462.50	Telephone call with Plaintiff Edder re communicating with potential fact witnesses/current resident
Sarah Colby	1/25/2019	0.20	\$995.00	\$298.50	Review order on defendants' motions to dismiss, strike, arbitrate
Sarah Colby	1/25/2019	0.20	\$995.00	\$199.00	Emails with co-counsel and texts with clients re order on defendants' motions to dismiss, strike, and arbitrate
Sarah Colby	1/25/2019	0.70	\$995.00	\$696.50	Conference call with G. Wallace re order on defendants' motion to dismiss, strike, arbitrate, trial preparation, discovery, and case management conference statement
Kathryn Stebner	1/25/2019	1.50	\$1,300.00	\$1,950.00	Review order denying motion to compel arbitration and to dismiss
Kathryn Stebner	1/25/2019	0.40	\$1,300.00	\$520.00	Phone call with S. Colby re arbitration order and next steps
Kathryn Stebner	1/25/2019	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre and G. Kawamoto re arbitration order and assignments
Brian Umpierre	1/25/2019	1.00	\$925.00	\$925.00	Review order denying motion to compel arbitration and to dismiss; email correspondence with team re same
Brian Umpierre	1/25/2019	0.30	\$925.00	\$277.50	Meet with K. Stebner and G. Kawamoto re arbitration order and assignments
Brian Umpierre	1/26/2019	0.30	\$995.00	\$298.50	Review order on motion to dismiss, strike, arbitrate; review slip re scheduling; research FRCP and G.O

Sarah Colby	1/29/2019	1.40	\$995.00	\$1,393.00	Meeting with G. Wallace, M. Johnson, T. Close, G. Grunfeld, B. Bien-Kahn, J. Yellin
Sarah Colby	1/30/2019	0.20	\$995.00	\$189.00	Call with G. Wallace re contacting proposed class members
Sarah Colby	1/30/2019	0.40	\$995.00	\$765.00	Conference call with S. Eider re conditions at Brookdale San Ramon, potential witnesses and class representatives
Sarah Colby	1/31/2019	0.10	\$995.00	\$99.50	Emails with co-counsel re contacting former Brookdale employees and potential experts
Sarah Colby	1/31/2019	0.40	\$995.00	\$398.00	Phone call with proposed class member/resident's guardian ad litem and follow up email to her requesting records; draft record request letter
Sarah Colby	2/4/2019	0.10	\$995.00	\$99.50	email putative class member's guardian ad litem about meeting with putative class member
Sarah Colby	2/6/2019	0.20	\$995.00	\$189.00	Phone call with Sharon Eider re update on Brookdale San Ramon and potential witnesses
Sarah Colby	2/14/2019	0.30	\$995.00	\$298.50	Phone call with J. Yellin re Third Amended Complaint
Sarah Colby	2/14/2019	0.20	\$995.00	\$189.00	Review Third Amended Complaint in advance of call with J. Yellin
Sarah Colby	2/15/2019	0.40	\$995.00	\$398.00	Phone call with G. Wallace re discovery / class certification plan and strategy
Kathryn Stebner	2/20/2019	0.50	\$1,300.00	\$650.00	Discussion with B. Umpierre re successor in interest as class representative
Brian Umpierre	2/20/2019	0.70	\$925.00	\$647.50	Email/phone call with J. Yellin re successors in interest and issue to amend to substitute class representatives
Brian Umpierre	2/20/2019	0.40	\$925.00	\$370.00	Emails with G. Kawamoto, D. Zaczynski re successor in interest for deceased plaintiff's successor
Sarah Colby	2/20/2019	1.00	\$995.00	\$995.00	Conference call with Sharon Eider re update on Brookdale San Ramon, potential witnesses and possible declarations from putative class members
Kathryn Stebner	3/4/2019	1.00	\$1,300.00	\$1,300.00	Meet with B. Umpierre re Rule 26 report and discovery plan
Brian Umpierre	3/4/2019	1.00	\$925.00	\$925.00	Meeting with K. Stebner re Rule 26 report and discovery plan
Brian Umpierre	3/6/2019	0.20	\$925.00	\$647.50	Review Initial Disclosures and draft motions/comp Rule 26 conference
Sarah Colby	3/6/2019	0.20	\$995.00	\$189.00	Call with G. Grunfeld re Motion to Stay and email to co-counsel re same argument in related case
Sarah Colby	3/6/2019	0.10	\$995.00	\$99.50	Review orders and email from G. Grunfeld re motion to stay
Kathryn Stebner	3/6/2019	0.80	\$1,300.00	\$1,040.00	Review draft Rule 26 report
Kathryn Stebner	3/6/2019	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre re draft Rule 26 report
Brian Umpierre	3/6/2019	0.60	\$925.00	\$555.00	Review order on motion to compel/early Rule 26 conference in similar understaffing case re same issue ; review magistrate judge's orders re same
Brian Umpierre	3/6/2019	0.50	\$925.00	\$462.50	Meeting with K. Stebner re draft Rule 26 report
Sarah Colby	3/10/2019	1.10	\$995.00	\$1,294.50	Review motion to stay papers and edit opposition
Sarah Colby	3/10/2019	0.10	\$995.00	\$99.50	Email J. Yellin and G. Grunfeld re edits to opposition to motion to stay
Sarah Colby	3/11/2019	0.10	\$995.00	\$99.50	Emails with G. Grunfeld and J. Yellin re unpublished opinion and motion to stay opposition
Sarah Colby	3/14/2019	2.50	\$995.00	\$2,487.50	Meeting with Eider and Siner (includes drive to and from Dublin)
Sarah Colby	3/14/2019	1.30	\$995.00	\$1,293.50	Travel to/from Dublin, CA for meeting with clients
Sarah Colby	3/15/2019	0.10	\$995.00	\$99.50	Emails with co-counsel re hearing before Magistrate Stebner and review of discovery order
Kathryn Stebner	3/15/2019	0.80	\$1,300.00	\$1,040.00	Review Order following CHC opening discovery and discussion with S. Colby re same
Kathryn Stebner	3/15/2019	0.50	\$1,300.00	\$650.00	Discussion with B. Umpierre re assignments/responsibilities following opening of discovery
Brian Umpierre	3/15/2019	0.30	\$925.00	\$277.50	Email correspondence with J. Yellin re document review availability and protocol
Brian Umpierre	3/15/2019	0.40	\$925.00	\$370.00	Review order following 3/14 case management conference opening discovery and permitting rolling productions
Brian Umpierre	3/19/2019	0.40	\$925.00	\$370.00	Case/fact development - review DSS report re allegations of failure to provide care services
Sarah Colby	3/20/2019	0.70	\$995.00	\$695.00	Review/edit opposition to request for interlocutory appeal
Sarah Colby	3/20/2019	0.10	\$995.00	\$99.50	Review emails from M. Johnson and G. Grunfeld re proposed protective order
Sarah Colby	3/26/2019	0.50	\$995.00	\$497.50	Phone call with named Plaintiff S. Siner re problems with morning staffing
Sarah Colby	3/26/2019	0.10	\$995.00	\$99.50	Emails with co-counsel re Siner's morning staffing issues
Sarah Colby	3/26/2019	0.40	\$995.00	\$497.50	Call with G. Grunfeld and T. Wallace re class representative problems in facility
Sarah Colby	3/29/2019	0.60	\$995.00	\$597.00	Call with Sharon Eider re Brookdale San Ramon staffing issues
Sarah Colby	4/2/2019	0.10	\$995.00	\$99.50	Review email from S. Eider with possible class decarants
Sarah Colby	4/4/2019	0.20	\$995.00	\$189.00	Further emails with S. Eider with possible class decarants
Sarah Colby	4/4/2019	0.40	\$995.00	\$398.00	Call with S. Siner re morning staff shortage and her call with Executive Director re same
Sarah Colby	4/4/2019	0.30	\$995.00	\$298.50	Call and texts with S. Eider re class member contact with media
Sarah Colby	4/4/2019	0.20	\$995.00	\$189.00	Emails with G. Grunfeld and putative class member re media contact
Sarah Colby	4/6/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re morning prep staffing shortage
Sarah Colby	4/7/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re morning prep staff shortage
Sarah Colby	4/7/2019	0.40	\$995.00	\$398.00	Call with K. Stebner re class member declarations
Kathryn Stebner	4/7/2019	0.40	\$1,300.00	\$520.00	Call with S. Colby re class member declarations
Sarah Colby	4/8/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re morning prep staffing shortage
Brian Umpierre	4/8/2019	0.40	\$925.00	\$370.00	Telephone call with putative class member - initial, case background and nature of class actions; email to group re same
Sarah Colby	4/8/2019	0.20	\$995.00	\$189.00	Emails with G. Grunfeld, J. Yellin, G. Wallace re model class declarations
Kathryn Stebner	4/9/2019	0.20	\$1,300.00	\$260.00	Review B. Umpierre email re issue re Brookdale understaffing inquiry
Sarah Colby	4/16/2019	0.50	\$995.00	\$497.50	Call with S. Eider re case update - motions, discovery, circumstances at Brookdale San Ramon
Brian Umpierre	4/16/2019	0.10	\$995.00	\$99.50	Call with S. Siner re update on staffing issues in mornings
Brian Umpierre	4/16/2019	0.20	\$925.00	\$185.00	Review correspondence re press inquiries regarding case
Brian Umpierre	4/16/2019	0.20	\$925.00	\$185.00	Review first set of produced documents
Brian Umpierre	4/29/2019	0.80	\$925.00	\$740.00	Review Defendants' responses and objections to first wave of document requests and team emails re same
Brian Umpierre	4/29/2019	0.60	\$925.00	\$555.00	Review discovery response overview chart of all responses / objections, in advance of team discovery call
Kathryn Stebner	4/30/2019	0.20	\$1,300.00	\$260.00	Review team emails summarizing Defendants' responses and objections to first wave of document requests
Kathryn Stebner	4/30/2019	0.60	\$1,300.00	\$780.00	Meet with B. Umpierre re Defendants' responses and objections to RPDs and actual documents produced
Sarah Colby	5/14/2019	0.20	\$995.00	\$189.00	Call with G. Wallace re status of discovery and class certification
Sarah Colby	5/14/2019	0.10	\$995.00	\$99.50	Research articles on Brookdale
Sarah Colby	5/14/2019	0.40	\$995.00	\$398.00	Call with M. Johnson and T. Close re discovery dispute re quality services and operations meetings document requests
Sarah Colby	5/15/2019	0.10	\$995.00	\$99.50	Emails with K. Stebner re quality assurance privilege in elder abuse cases research
Sarah Colby	5/16/2019	0.40	\$995.00	\$398.00	Research DSS citations and articles on Brookdale
Sarah Colby	5/16/2019	1.00	\$995.00	\$995.00	Research for meet and confer letter re quality assurance/docs document request
Sarah Colby	5/20/2019	1.40	\$995.00	\$1,592.00	Research and review documents for meet and confer letter re quality services and operations meetings document requests
Sarah Colby	5/20/2019	0.30	\$995.00	\$298.50	Email to M. Johnson re research on meet and confer letter re quality services and operations meetings document requests
Sarah Colby	6/6/2019	0.30	\$995.00	\$298.50	Review order denying defendant's motion for stay, emails with co-co re same; emails with class members re same
Kathryn Stebner	6/7/2019	0.50	\$1,300.00	\$650.00	Review and forward re team industry article re Brookdale's AL business
Brian Umpierre	6/7/2019	0.20	\$925.00	\$185.00	Case/fact development - review industry article re Brookdale forwarded by K. Stebner
Kathryn Stebner	6/7/2019	0.30	\$1,300.00	\$390.00	Review order denying stay
Sarah Colby	6/12/2019	0.10	\$995.00	\$99.50	Call with G. Grunfeld re discovery dispute re inspecting memory care units
Sarah Colby	6/12/2019	0.10	\$995.00	\$1,393.00	Review and edit letter from G. Grunfeld to defend re inspecting memory care units (includes research)
Sarah Colby	6/13/2019	1.40	\$995.00	\$1,591.00	Emails with co-counsel re site inspections
Sarah Colby	6/17/2019	0.20	\$995.00	\$189.00	Call with G. Wallace re class certification issues and related discovery
Sarah Colby	6/20/2019	0.20	\$995.00	\$298.50	Draft email memorandum to co-counsel summarizing call with S. Steiner and S. Eider
Sarah Colby	6/20/2019	0.10	\$995.00	\$99.50	Emails with counsel re site visits
Sarah Colby	6/20/2019	0.50	\$995.00	\$497.50	Call with S. Siner re site visits, resident survey, call with Brookdale's CUI, and further update re staffing, caregivers
Sarah Colby	6/20/2019	0.90	\$995.00	\$895.00	Call with S. Eider re site visits, resident survey, Brookdale's CUI, discovery disputes
Sarah Colby	6/20/2019	0.40	\$995.00	\$398.00	Call with K. Stebner re class member problems with caregivers
Kathryn Stebner	6/20/2019	0.40	\$1,300.00	\$520.00	Call with S. Colby re class member problems with caregivers
Brian Umpierre	6/20/2019	0.20	\$925.00	\$185.00	Review email from S. Colby re meeting with S. Eider and S. Siner
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Email correspondence with co-counsel re Brookdale resident survey
Sarah Colby	6/26/2019	0.20	\$995.00	\$189.00	Call with S. Eider re follow up on resident survey, site visits, FC meeting
Sarah Colby	6/26/2019	0.50	\$995.00	\$497.50	Review/edit discovery letter - research on DSS licensing requirements for inclusion in letter
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Call with G. Wallace re discovery letter edits
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re resident survey
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Review memo re site visit of San Pablo facility
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Emails with G. Wallace and T. Close re licensing documents for discovery dispute
Sarah Colby	7/6/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re updates on Brookdale San Ramon
Brian Umpierre	7/6/2019	0.40	\$925.00	\$370.00	Search Rebuttal discovery platform for policies and procedures re disasters, safety and environment, emergency and first aid, and transportation; email with G. Kawamoto re same
Sarah Colby	7/9/2019	0.20	\$995.00	\$189.00	Emails with co-counsel, expert Mastin, and defense counsel re covering site inspection of Fountainview
Sarah Colby	7/9/2019	0.10	\$995.00	\$99.50	Email with G. Kawamoto re protective order
Sarah Colby	7/13/2019	0.10	\$995.00	\$99.50	Emails with co-counsel and expert G. Waters re scheduling additional site inspections
Brian Umpierre	7/13/2019	1.20	\$925.00	\$1,110.00	Review third set of produced documents
Sarah Colby	7/16/2019	0.10	\$995.00	\$99.50	Texts with S. Siner re meeting
Sarah Colby	7/16/2019	0.30	\$995.00	\$298.50	Review discovery letter re memory care units and emails with co-counsel re same
Sarah Colby	7/22/2019	0.20	\$995.00	\$189.00	Review/edit motion for extension for answering brief in 8th case - arbitration appeal
Sarah Colby	7/23/2019	3.00	\$995.00	\$2,985.00	Meet with S. Siner (includes travel to and from) to discuss case status/developments
Sarah Colby	7/23/2019	0.50	\$995.00	\$497.50	Travel to/from meeting with S. Siner
Sarah Colby	8/1/2019	2.00	\$995.00	\$1,990.00	Meeting with co-counsel re discovery, site inspections, appeal, class certification motion planning
Sarah Colby	8/1/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re situation at Brookdale San Ramon
Sarah Colby	8/6/2019	0.20	\$995.00	\$189.00	Call with M. Johnson re subpoenas to DSS, ESI search terms, and related document requests
Sarah Colby	8/7/2019	0.80	\$995.00	\$997.00	Call with S. Eider re update on family counsel meeting, bus transportation, new call pendents
Sarah Colby	8/6/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re situation at Brookdale San Ramon
Brian Umpierre	8/21/2019	0.40	\$925.00	\$370.00	Telephone call with G. Wallace, M. Johnson re mechanics of propounding DSS subpoenas; email to G. Kawamoto re same
Brian Umpierre	8/22/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re site inspection of Brookdale San Ramon and email with co-counsel re same
Sarah Colby	8/22/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re site inspections
Sarah Colby	8/24/2019	0.10	\$995.00	\$99.50	Email to/from Rita Siner re ER evacuation procedure documentation
Sarah Colby	9/4/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re situation at Brookdale San Ramon
Sarah Colby	9/6/2019	0.10	\$995.00	\$99.50	Texts from/to S. Siner re situation at Brookdale San Ramon
Sarah Colby	9/23/2019	0.20	\$995.00	\$189.00	Texts with S. Siner re updates on Brookdale San Ramon and mediation and texts from/to S. Eider re mediation
Kathryn Stebner	10/2/2019	0.60	\$1,300.00	\$780.00	Emails with B. Umpierre re staffing-related discovery
Brian Umpierre	10/7/2019	0.30	\$925.00	\$277.50	Emails with team re possible co-counsel website re Brookdale litigation
Brian Umpierre	10/7/2019	0.70	\$925.00	\$647.50	Emails with K. Stebner re staffing-related discovery - data
Brian Umpierre	10/7/2019	0.40	\$925.00	\$370.00	Discussion with K. Stebner re staffing-related discovery - status and scope of data requests
Sarah Colby	10/3/2019	0.10	\$995.00	\$99.50	Texts to/from S. Siner re updates on Brookdale San Ramon and mediation
Kathryn Stebner	10/3/2019	0.30	\$1,300.00	\$390.00	Discuss staffing data discovery with B. Umpierre
Sarah Colby	10/4/2019	0.50	\$995.00	\$497.50	Review and edit mediation brief
Sarah Colby	10/4/2019	0.10	\$995.00	\$99.50	Email to G. Wallace re mediation brief edits
Kathryn Stebner	10/6/2019	10.00	\$1,300.00	\$13,000.00	Prepare for and participate in mediation with Judge Infante, SF JAMS, including read review mediation briefs and internal communications with G. Wallace and G. Grunfeld re same
Brian Umpierre	10/6/2019	0.40	\$925.00	\$370.00	Email correspondence with M. Johnson re staffing-related class discovery
Brian Umpierre	10/6/2019	5.20	\$925.00	\$4,810.00	Draft staffing-specific written discovery requests
Brian Umpierre	10/10/2019	4.00	\$925.00	\$3,700.00	Case strategy meeting with co-counsel at Schneider Wallace including discovery, experts
Kathryn Stebner	10/11/2019	0.30	\$1,300.00	\$390.00	Review B. Umpierre email re co-counsel meeting at Schneider Wallace re discovery, experts, strategy
Kathryn Stebner	10/11/2019	0.70	\$1,300.00	\$910.00	Meet with B. Umpierre re co-counsel meeting at Schneider Wallace
Kathryn Stebner	10/11/2019	0.30	\$1,300.00	\$390.00	Emails with B. Umpierre re task list / assignments from co-counsel meeting
Brian Umpierre	10/11/2019	0.40	\$925.00	\$370.00	Summary of Schneider Wallace meeting to K. Stebner
Brian Umpierre	10/11/2019	0.30	\$925.00	\$277.50	Emails with K. Stebner re task list following co-counsel meeting
Brian Umpierre	10/11/2019	0.30	\$925.00	\$277.50	Review draft outreach letter to putative class members
Brian Umpierre	10/11/2019	0.50	\$925.00	\$462.50	Review index of newly produced documents
Brian Umpierre	10/16/2019	0.70	\$925.00	\$647.50	Review script for use with calls with putative class members; emails with team re same
Kathryn Stebner	10/16/2019	0.50	\$1,300.00	\$650.00	Review script for use by staff via calls / outreach with putative class members and discuss same with B. Umpierre
Kathryn Stebner	10/19/2019	0.50	\$1,300.00	\$650.00	Meet with G. Kawamoto re Brookdale case information for Stebner-firm website
Brian Umpierre	10/19/2019	0.50	\$925.00	\$462.50	Review updated script and FAQs for putative class member calls and provide feedback
Brian Umpierre	10/19/2019	0.20	\$925.00	\$185.00	Review G. Kawamoto email re meeting with A. Xu re Brookdale case info for Stebner firm website
Kathryn Stebner	10/19/2019	0.40	\$1,300.00	\$520.00	Discuss with B. Umpierre and G. Kawamoto re Brookdale firm participation in class outreach project
Brian Umpierre	10/30/2019	1.20	\$925.00	\$1,110.00	Review G. Kawamoto email to Stebner staff and related materials for class outreach project; discussion with G. Kawamoto re same
Brian Umpierre	11/4/2019	0.50	\$925.00	\$462.50	Review draft fourth set of document requests; email comments re same
Brian Umpierre	11/4/2019	0.40	\$925.00	\$370.00	Review email from S. Colby re 7th of Brookdale responses re cost of labor
Brian Umpierre	11/6/2019	0.20	\$925.00	\$185.00	Internal emails re Relativity document review status and availability
Brian Umpierre	11/6/2019	0.80	\$925.00	\$740.00	Review and email comments re draft 30(b)(6) deposition notice
Kathryn Stebner	11/10/2019	1.30	\$1,300.00	\$1,090.00	Discuss draft 30(b)(6) deposition notice topics with K. Stebner and S. Colby
Brian Umpierre	11/10/2019	0.30	\$925.00	\$277.50	Internal emails re potential RCFE staffing experts
Brian Umpierre	11/10/2019	0.10	\$925.00	\$92.50	Review and comment on internal team emails regarding potential RCFE staffing experts
Brian Umpierre	11/18/2019	0.50	\$925.00	\$462.50	Review / comment on 30(b)(6) depo notice topics
Brian Umpierre	11/18/2019	0.20	\$925.00	\$185.00	Review agenda for team call re discovery/preview
Brian Umpierre	11/18/2019	0.20	\$925.00	\$185.00	Review discovery meet and confer summary re Plaintiff's requests for residency agreements and arbitration-related docs
Brian Umpierre	11/18/2019	0.20	\$925.00	\$185.00	Review M. Johnson email re Defendants' production of board of director minutes and next steps
Kathryn Stebner	11/19/2019	0.60	\$1,300.00	\$780.00	Discuss further edits to draft 30(b)(6) deposition notice with B. Umpierre
Brian Umpierre	11/19/2019	3.80			

Brian Umpleire	11/20/2019	0.20	\$925.00	\$185.00	Review summary of document production regarding resident complaints
Brian Umpleire	11/20/2019	0.90	\$925.00	\$932.50	Review pleadings in Brookdale class action in NY addressing ownership related issues and email to M. Johnson re same
Brian Umpleire	11/20/2019	6.50	\$925.00	\$6,512.50	Document review - Umpleire assigned batch
Brian Umpleire	11/21/2019	0.20	\$925.00	\$185.00	Review and comment re proposed email response to defense re Brookdale's production of residency agreements
Brian Umpleire	11/22/2019	7.10	\$925.00	\$6,567.50	Document review - Umpleire assigned batch
Brian Umpleire	11/22/2019	0.20	\$925.00	\$185.00	Internal emails re scheduling for Brookdale class outreach training call
Brian Umpleire	11/22/2019	4.50	\$925.00	\$4,162.50	Document review - Umpleire assigned batch
Brian Umpleire	12/4/2019	0.20	\$925.00	\$185.00	Review draft discovery meet and confer letter re outstanding issues and impact on case schedule
Kathryn Stehner	12/5/2019	0.60	\$1,300.00	\$780.00	Meet with B. Umpleire re discovery status and strategy
Brian Umpleire	12/5/2019	0.20	\$925.00	\$185.00	Review defense email re update on certain discovery issues and request for extension and meet and confer
Brian Umpleire	12/5/2019	0.40	\$925.00	\$370.00	Meet with K. Stehner with update re discovery status and strategy
Brian Umpleire	12/11/2019	0.20	\$925.00	\$185.00	Email correspondence with co-counsel re BeLine/putative class member call back assignments
Brian Umpleire	12/12/2019	4.00	\$925.00	\$4,255.00	Document review - Umpleire assigned batch
Brian Umpleire	12/12/2019	0.20	\$925.00	\$185.00	Email correspondence with internal team and T. Clore re class outreach protocol
Brian Umpleire	12/13/2019	5.50	\$925.00	\$5,087.50	Document review - Umpleire assigned batch
Kathryn Stehner	12/17/2019	5.00	\$1,300.00	\$6,500.00	Meeting at Schneider Wallace re case strategy / experts / counsel
Brian Umpleire	12/17/2019	4.50	\$925.00	\$4,162.50	Meeting at Schneider Wallace firm re staffing analysis requirements and potential experts
Brian Umpleire	12/17/2019	1.50	\$925.00	\$1,387.50	Document review - Umpleire assigned batch
Brian Umpleire	12/17/2019	0.30	\$925.00	\$277.50	Internal email correspondence re responses to class outreach / putative class member inquiries
Kathryn Stehner	12/18/2019	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire re results of case strategy meeting and next steps
Brian Umpleire	12/18/2019	0.50	\$925.00	\$462.50	Update SharePoint with Stehner from call back assignments, email to internal staff re same
Brian Umpleire	12/18/2019	5.70	\$925.00	\$5,272.50	Document review - Umpleire assigned batch
Brian Umpleire	12/18/2019	0.40	\$925.00	\$370.00	Meeting with K. Stehner re co-counsel meeting - results and assignments
Brian Umpleire	12/19/2019	3.80	\$925.00	\$3,515.00	Document review - Umpleire assigned batch
Kathryn Stehner	12/20/2019	1.70	\$1,300.00	\$910.00	Meet with B. Umpleire re Defendants' latest responses and objections to RPOs and motions to compel
Brian Umpleire	12/20/2019	0.70	\$925.00	\$647.50	Review complaint and 300(b)(6) depo notice from Marks firm's Brookdale action for pertinent information applicable to this action
Brian Umpleire	12/20/2019	0.50	\$925.00	\$462.50	Review Brookdale's objections to 4th set of document requests
Brian Umpleire	12/20/2019	0.50	\$925.00	\$462.50	Meeting with K. Stehner re Brookdale's objections and responses to written discovery and motions to compel
Brian Umpleire	12/20/2019	0.30	\$925.00	\$277.50	Review Brookdale discovery response spreadsheet for meet and confer follow up and potential motion to compel
Brian Umpleire	12/21/2019	1.60	\$925.00	\$1,480.00	Review Brookdale discovery response spreadsheet re Set 4 responses/objections and email to M. Johnson re relevance of requested information and proposed meet and confer arguments for why production is required
Kathryn Stehner	1/4/2020	0.50	\$1,300.00	\$650.00	Discussion with B. Umpleire re Brookdale insurance records produced in discovery
Kathryn Stehner	1/4/2020	0.50	\$925.00	\$462.50	Discussion with K. Stehner re Brookdale insurance information produced in discovery
Kathryn Stehner	1/7/2020	5.00	\$1,300.00	\$6,500.00	Discuss with K. Umpleire re liability insurance policy review and scheduling call with insurance coverage consultant
Brian Umpleire	1/7/2020	4.00	\$925.00	\$3,700.00	Review and index insurance policies produced in discovery for coverage consultant
Brian Umpleire	1/8/2020	0.50	\$925.00	\$462.50	Review and index insurance policies produced in discovery for coverage consultant
Brian Umpleire	1/8/2020	0.60	\$925.00	\$555.00	Work with internal staff on BeLine/putative class member callbacks and corresponding SharePoint updates including script and protocol
Brian Umpleire	1/8/2020	1.20	\$925.00	\$1,110.00	Review and index insurance policies produced in discovery for coverage consultant
Brian Umpleire	1/8/2020	0.40	\$925.00	\$370.00	Review pendant response time document, review outstanding document requests for inclusion of same, email to group re same
Brian Umpleire	1/10/2020	0.70	\$925.00	\$2,497.50	Insurance policy project - index for coverage consultant
Brian Umpleire	1/13/2020	0.40	\$925.00	\$370.00	Review draft discovery meet and confer letter re documents evidencing resident complaints
Kathryn Stehner	1/14/2020	0.60	\$1,300.00	\$780.00	Review package of liability insurance policy materials to send to consultant
Kathryn Stehner	1/14/2020	1.30	\$1,300.00	\$390.00	Discussion with B. Umpleire insurance policy coverage materials for consultant
Brian Umpleire	1/14/2020	1.20	\$925.00	\$1,110.00	Prepare package for coverage consultant and forward same to K. Stehner
Brian Umpleire	1/21/2020	0.40	\$925.00	\$370.00	Review email correspondence re ESI discovery and search terms
Brian Umpleire	1/22/2020	0.30	\$925.00	\$277.50	Discussion with internal staff re class outreach communications
Brian Umpleire	1/22/2020	0.50	\$925.00	\$370.00	Review email correspondence from G. Wallace re search terms / custodian tasks in advance of team call re same
Kathryn Stehner	1/23/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire for update on class outreach / communications project
Brian Umpleire	1/23/2020	1.00	\$925.00	\$925.00	Email to G. Wallace, M. Johnson, S. Colby re proposed ESI search terms, search terms used in related understaffing litigation, proposed document custodians, and attaching same
Kathryn Stehner	1/24/2020	0.20	\$1,300.00	\$520.00	Review industry article re Brookdale's purchase of additional assisted living facilities and forward same to team
Brian Umpleire	1/24/2020	0.20	\$925.00	\$20.00	ClassCast development - review article from K. Stehner re Brookdale purchase of additional assisted living facilities
Brian Umpleire	1/24/2020	2.00	\$925.00	\$1,850.00	Review search term / custodian info in advance of call re same, including draft proposed terms from similar litigation, Complaints in similar litigation, Brookdale organizational charts in this litigation
Kathryn Stehner	1/25/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpleire re proposed search terms and custodians and concepts from previous RCFE cases
Brian Umpleire	1/25/2020	0.50	\$925.00	\$462.50	Confere call with G. Wallace, S. Colby, D. Marks re proposed ESI search terms and document custodians
Brian Umpleire	1/25/2020	0.60	\$925.00	\$555.00	Meeting with K. Stehner re proposed search terms and custodians and concepts from previous RCFE cases
Brian Umpleire	1/27/2020	0.50	\$925.00	\$462.50	Review Waymo case re obligation to produce readily accessible responsive documents even if not technically responsive to search terms
Brian Umpleire	1/28/2020	0.30	\$925.00	\$277.50	Review summary of discovery meet and confer call re production of documents evidencing resident complaints
Kathryn Stehner	1/28/2020	1.50	\$1,300.00	\$650.00	Discussion with B. Umpleire re status of outstanding discovery disputes and motions to compel
Brian Umpleire	1/31/2020	0.30	\$925.00	\$277.50	Review draft discovery meet and confer letter re outstanding discovery disputes and potential resolution
Brian Umpleire	2/3/2020	1.00	\$925.00	\$925.00	Relatively database searches re Brookdale's company wide use of Tardis as assessment software
Brian Umpleire	2/3/2020	0.50	\$925.00	\$462.50	Emails with G. Wallace re discovery meet and confer letter regarding production of resident assessment data, phone call with M. Johnson re same
Brian Umpleire	2/9/2020	6.50	\$925.00	\$6,012.50	Draft meet and confer letter re production of assessment/payroll data for staffing analysis
Brian Umpleire	2/6/2020	0.50	\$925.00	\$462.50	Discussion with G. Wallace, M. Johnson re assessment/payroll data meet and confer letter and discovery strategy
Kathryn Stehner	2/7/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpleire re request for assessment / payroll data and discuss meet and confer letter to counsel re same
Brian Umpleire	2/7/2020	1.50	\$925.00	\$925.00	Edits to assessment/payroll data meet and confer letter, circulate to G. Wallace, M. Johnson re review, comment
Brian Umpleire	2/7/2020	0.50	\$925.00	\$462.50	Finalize assessment/payroll meet and confer letter and send to defense
Brian Umpleire	2/7/2020	0.40	\$925.00	\$370.00	Meet with K. Stehner re request for assessment / payroll data and discuss meet and confer letter to counsel re same
Brian Umpleire	2/7/2020	0.40	\$925.00	\$370.00	Review operative and near final list of proposed search terms
Brian Umpleire	2/9/2020	0.50	\$925.00	\$462.50	Review operative draft of Statement of (Discovery) Issues
Brian Umpleire	2/10/2020	0.80	\$925.00	\$740.00	Review key documents on Relativity database re service alignment, labor tracking, interpretive guidelines
Brian Umpleire	2/11/2020	0.50	\$925.00	\$462.50	Review operative draft of Statement of (Discovery) Issues, email to G. Wallace re same
Brian Umpleire	2/11/2020	0.50	\$925.00	\$462.50	Review operative Statement of (Discovery) Issues, email comments/index to G. Wallace
Brian Umpleire	2/12/2020	0.60	\$925.00	\$555.00	Review additional key documents on Relativity database re service alignment, email to M. Johnson re same
Kathryn Stehner	2/13/2020	1.00	\$1,300.00	\$1,300.00	Phone call with B. Umpleire, Alex Stuart [consultant] re Brookdale insurance policies / coverage; discussion with B. Umpleire re same.
Kathryn Stehner	2/13/2020	0.60	\$1,300.00	\$780.00	Discussion with B. Umpleire re follow up items following call with coverage consultant
Brian Umpleire	2/13/2020	1.50	\$925.00	\$1,387.50	Phone call with K. Stehner and Alex Stuart [insurance consultant] re Brookdale insurance policies / coverage
Brian Umpleire	2/13/2020	0.60	\$925.00	\$555.00	Discussion with K. Stehner re follow up items following call with insurance consultant
Brian Umpleire	2/13/2020	0.20	\$925.00	\$185.00	Phone call with G. Wallace re Brookdale insurance coverage and discussion with coverage consultant
Brian Umpleire	2/13/2020	0.40	\$925.00	\$370.00	Review Brookdale's portion of discovery letter brief re production of documents evidencing resident complaints
Brian Umpleire	2/14/2020	0.20	\$925.00	\$185.00	Review A. Keelin (Brookdale Executive Director) deposition notice
Brian Umpleire	2/17/2020	0.30	\$925.00	\$277.50	Review discovery meet and confer letter re Brookdale's overboard production
Kathryn Stehner	2/18/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpleire re discovery - status of meet and confer and joint statements/MTCs re staffing analysis discovery
Brian Umpleire	2/18/2020	1.00	\$925.00	\$370.00	Email correspondence with M. Johnson re 2/18 meet and confer session/download assessment software / track time documents relevant to same
Brian Umpleire	2/18/2020	1.80	\$925.00	\$1,665.00	Prepare for 2/18 meet and confer session - review PDFS documents produced in discovery, meet and confer letter, final Joint Statement, Brookdale's Set 4 RPO responses
Brian Umpleire	2/18/2020	0.30	\$925.00	\$277.50	Review and comment on Brookdale's portion of joint statement on scheduling
Brian Umpleire	2/19/2020	0.60	\$925.00	\$555.00	Meet with B. Umpleire re discovery updates - status of meet and confers and joint statements/MTCs re staffing analysis discovery
Kathryn Stehner	2/18/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re discovery updates
Brian Umpleire	2/19/2020	1.20	\$925.00	\$1,110.00	Telephonic meet and confer with G. Wallace re production of assessment/payroll data
Brian Umpleire	2/19/2020	0.30	\$925.00	\$277.50	Email correspondence with G. Wallace re results of 2/19 meet and confer session regarding discovery, assessment/payroll data production
Kathryn Stehner	2/20/2020	0.30	\$1,300.00	\$390.00	Review update from B. Umpleire re meet and confer on staffing analysis discovery
Brian Umpleire	2/20/2020	0.70	\$925.00	\$647.50	Discussion with G. Wallace and M. Johnson re discovery plan
Brian Umpleire	2/20/2020	0.40	\$925.00	\$370.00	Review further edits to Joint Statement re schedule following insertion of Brookdale's portion
Brian Umpleire	2/20/2020	0.40	\$925.00	\$370.00	Review M. Johnson summary of 2/18 discovery meet and confer and response
Brian Umpleire	2/21/2020	0.50	\$925.00	\$462.50	Review draft M. Johnson letter demanding a pre-motion to compel final meet and confer on Defendants' production of payroll and assessment data
Brian Umpleire	2/21/2020	0.30	\$925.00	\$277.50	Review and comment on M. Johnson email identifying documents needed from individual facilities not held in a central location
Brian Umpleire	2/21/2020	0.70	\$925.00	\$647.50	Review budget related materials produced in discovery, email to M. Johnson re strategy
Brian Umpleire	2/21/2020	0.30	\$925.00	\$277.50	Email to M. Johnson re Brookdale's production of budget / budget information
Kathryn Stehner	2/26/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re update on discovery meet and confers re staffing analysis and production of assessment and payroll data
Brian Umpleire	2/26/2020	0.20	\$925.00	\$185.00	Phone call with G. Wallace re production of assessment / payroll data for staffing analysis
Brian Umpleire	2/26/2020	0.50	\$925.00	\$462.50	Meeting with K. Stehner re update on discovery meet and confers re staffing analysis and production of assessment and payroll data
Kathryn Stehner	3/1/2020	0.40	\$1,300.00	\$520.00	Discuss draft stipulation on class certification schedule with B. Umpleire
Brian Umpleire	3/1/2020	0.30	\$925.00	\$277.50	Phone call with BeLine contact / putative class member (BP); email summary of same
Brian Umpleire	3/1/2020	0.20	\$925.00	\$185.00	Review stipulation on schedule for class certification
Brian Umpleire	3/1/2020	0.30	\$925.00	\$277.50	Meet with K. Stehner re discuss proposed schedule for class certification briefing
Kathryn Stehner	3/3/2020	0.20	\$1,300.00	\$260.00	Discuss proposed class certification briefing schedule with B. Umpleire
Brian Umpleire	3/4/2020	0.80	\$925.00	\$740.00	Phone call (conf'd) with BeLine contact / putative class member (BP) re background and options; email summary to internal staff with follow up tasks
Brian Umpleire	3/4/2020	0.60	\$925.00	\$555.00	Review draft joint discovery letter brief re ESI; email to M. Johnson re same
Brian Umpleire	3/4/2020	0.70	\$925.00	\$647.50	Review draft joint discovery letter brief re assessment / payroll data and personal meet and confer notes re same; email to M. Johnson re same
Kathryn Stehner	3/6/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re plan for Plaintiff's discovery responses
Brian Umpleire	3/6/2020	1.00	\$925.00	\$925.00	Review / comment on proposed ESI search term spreadsheet, email to M. Johnson re same
Brian Umpleire	3/6/2020	0.40	\$925.00	\$370.00	Meeting with K. Stehner re Plaintiff's written discovery responses and responsibilities/assignments
Brian Umpleire	3/6/2020	0.50	\$925.00	\$462.50	Conference call among co-counsel re Plaintiff's discovery responses
Brian Umpleire	3/6/2020	0.40	\$925.00	\$370.00	Review and comment re defense counsel's response to discovery letter brief re ESI and staffing analysis data
Brian Umpleire	3/7/2020	2.50	\$925.00	\$2,312.50	Review Brookdale facility management agreements and draft memo re control
Brian Umpleire	3/8/2020	0.50	\$925.00	\$462.50	Review draft proposed class representative declarations supporting class certification
Brian Umpleire	3/8/2020	0.20	\$925.00	\$185.00	Review M. Johnson email responding to defense re discovery letter briefs
Brian Umpleire	3/9/2020	0.30	\$925.00	\$277.50	Internal email correspondence following discovery meet and confer re number of permissible interrogatories
Brian Umpleire	3/9/2020	0.40	\$925.00	\$370.00	Review Plaintiff's portion of draft letter brief re production of residency agreements
Brian Umpleire	3/10/2020	0.40	\$925.00	\$370.00	Review email correspondence between parties re proposal for addressing discovery issues
Brian Umpleire	3/10/2020	0.50	\$925.00	\$462.50	Review J. Yellin email summarizing call with former Brookdale ED - casefact development
Kathryn Stehner	3/11/2020	0.60	\$1,300.00	\$780.00	Discuss status of discovery negotiations / joint statements and status of Plaintiff's responses with B. Umpleire
Brian Umpleire	3/11/2020	0.50	\$925.00	\$462.50	Review ongoing email correspondence between parties re proposal for addressing discovery issues
Brian Umpleire	3/11/2020	0.50	\$925.00	\$462.50	Review Brookdale's portion of letter brief seeking re production of assessment / payroll data
Brian Umpleire	3/11/2020	0.50	\$925.00	\$462.50	Review and comment Brookdale's portion of letter brief re production of ESI
Brian Umpleire	3/11/2020	0.50	\$925.00	\$462.50	Update K. Stehner on status of discovery negotiations / joint statements and status of Plaintiff's responses
Brian Umpleire	3/11/2020	0.40	\$925.00	\$370.00	Review Plaintiff's portion of letter brief on identities of residents with disabilities
Brian Umpleire	3/14/2020	1.60	\$925.00	\$1,480.00	Finalize memo re evidence of Brookdale control from management agreement(s)
Brian Umpleire	3/18/2020	0.70	\$925.00	\$647.50	Review internal emails re change of defense counsel, look up new counsel background
Brian Umpleire	3/18/2020	0.50	\$925.00	\$462.50	Review email to D. Marks re staffing data and analysis - next steps and strategy
Brian Umpleire	3/26/2020	0.30	\$925.00	\$277.50	Review B. Umpleire memo re management agreement language indicating ESI, Inc. control
Brian Umpleire	3/26/2020	0.30	\$925.00	\$277.50	Review email from defense following introductory call and plan for resolving outstanding discovery issues
Brian Umpleire	3/31/2020	1.00	\$925.00	\$925.00	Review draft Silver interrogatory responses
Kathryn Stehner	4/2/2020	0.30	\$1,300.00	\$390.00	Review update from B. Umpleire re MAC on staffing analysis discovery
Brian Umpleire	4/2/2020	0.40	\$925.00	\$370.00	Review and comment re M. Johnson email to defense re status of outstanding discovery, pending letter brief re same, and plan for resolving without court intervention
Brian Umpleire	4/2/2020	0.10	\$925.00	\$92.50	Email correspondence with M. Johnson re payroll data codes required for staffing analysis
Brian Umpleire	4/3/2020	0.50	\$925.00	\$462.50	Review draft template responses to Brookdale's document requests
Brian Umpleire	4/6/2020	1.00	\$925.00	\$925.00	Review Kronos payroll data produced in similar understaffing litigation re data fields for total hours and account codes; email to M. Johnson re same
Brian Umpleire	4/6/2020	0.40	\$925.00	\$370.00	Review D. Marks email re data required for staffing analysis
Brian Umpleire	4/6/2020	1.10	\$925.00	\$1,017.50	Review defense email summarizing previous day's discovery call, review and comments re Brookdale's portions of letter briefs
Kathryn Stehner	4/7/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpleire re staffing analysis (Horse, Schirmer) reply declarations and rebuttal points
Brian Umpleire	4/13/2020	1.50	\$925.00	\$1,387.50	Review Plaintiff's draft RPO/RPOs and outstanding issues; notes re same, in preparation for and in advance of 1 pm call with team
Brian Umpleire	4/13/2020	1.70	\$925.00	\$1,572.50	Team discovery conference call re Plaintiff's RPO/RPO responses
Brian Umpleire	4/13/2020	0.20	\$925.00	\$185.00	Review defense email with update on outstanding discovery still owed
Brian Umpleire	4/14/2020	0.30	\$925.00	\$277.50	Forward discovery responses in similar understaffing litigation to team for review/reference in drafting Plaintiff's responses
Kathryn Stehner	4/16/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re status/strategy following co-counsel team call re discovery
Brian Umpleire	4/16/2020	0.40	\$925.00	\$370.00	Meeting with K. Stehner to update on status/strategy following co-counsel team call re discovery
Kathryn Stehner	4/17/2020	0.20	\$1,300.00	\$260.00	Review B. Umpleire email re objections to declarations from residents with POAs
Kathryn Stehner	4/18/2020	0.20	\$1,300.00	\$260.00	Email to B. Umpleire re re objections to declarations from residents with POAs
Kathryn Stehner	4/21/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re offensive Daubert motions against Defendants' staffing experts and reply declarations from

Kathryn Stehner	4/28/2020	0.40	\$1,300.00	\$820.00	Discussion with B. Umpiere re responsibility for Schmidt discovery / responses / deposition
Brian Umpiere	4/28/2020	0.30	\$925.00	\$277.50	Discussion with K. Stehner re Plaintiff Schmidt discovery responsibilities
Brian Umpiere	4/28/2020	0.40	\$925.00	\$277.50	Email correspondence with team re strategy for finalizing Plaintiff's discovery responses and client contacts re same
Brian Umpiere	4/29/2020	0.40	\$925.00	\$370.00	Email to B. Bien-Kahn re responsibility for Plaintiff Schmidt's discovery responses
Brian Umpiere	4/30/2020	0.50	\$925.00	\$462.50	Review draft Schmidt and Fisher (Schmidt's conservator) proposed class representative declarations in support of class certification
Brian Umpiere	4/30/2020	0.70	\$925.00	\$647.50	Review comprehensive internal analysis of staffing analysis data produced to date and next steps in same and response thereto
Brian Umpiere	4/30/2020	0.80	\$925.00	\$714.00	Review final draft of 2017 reply and email to G. Wallace re same
Kathryn Stehner	5/1/2020	0.30	\$1,300.00	\$390.00	Meet with B. Umpiere re internal analysis of staffing analysis data produced to date and next steps
Brian Umpiere	5/1/2020	0.40	\$925.00	\$277.50	Review and draft meet and confer letter re production of resident assessment data; email to M. Johnson re same
Brian Umpiere	5/1/2020	0.50	\$925.00	\$370.00	Review discovery overview memo re outstanding items and draft of action
Brian Umpiere	5/1/2020	0.80	\$925.00	\$740.00	Review understanding class action complaint filed against Brookdale in TN - case/fact development
Brian Umpiere	5/6/2020	0.50	\$925.00	\$462.50	Review draft stipulation re production of residency agreements and email correspondence with team re same
Brian Umpiere	5/6/2020	0.80	\$925.00	\$740.00	Email correspondence with M. Johnson re Brookdale documents indicating RPS data exists in database format for all residents; forward notes re same
Brian Umpiere	5/20/2020	0.50	\$925.00	\$462.50	Email correspondence with A. Xu and internal draft re putative class member contact and further follow up
Brian Umpiere	5/26/2020	1.50	\$925.00	\$1,387.50	Review Brookdale written discovery propounded to Plaintiff Schmidt in advance of telephone calls with his conservators in order to respond to discovery requests
Brian Umpiere	5/27/2020	0.70	\$925.00	\$647.50	Compile list of interview questions / docs to inquire about re class rep discovery
Brian Umpiere	5/27/2020	0.80	\$925.00	\$714.00	Email to Mary Gallagher, Heather Fisher re Schmidt written discovery responses and scheduling phone conferences
Brian Umpiere	5/27/2020	5.50	\$925.00	\$5,067.50	Review Plaintiff Schmidt documents on Relativity database and draft written discovery responses based thereon
Brian Umpiere	5/27/2020	0.50	\$925.00	\$462.50	Email correspondence with M. Gallagher, H. Fisher re Plaintiff Schmidt and scheduling meeting time
Kathryn Stehner	5/28/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpiere re discovery update / Schmidt preparation and responses and status of other plaintiffs' responses following co-counsel team call re same
Brian Umpiere	5/28/2020	0.50	\$925.00	\$462.50	Telephone conversation with M. Gallagher (former conservator) re Ralph Schmidt's experience at Brookdale for preparation of Schmidt draft ROG/RPO responses
Brian Umpiere	5/28/2020	5.40	\$925.00	\$4,995.00	Review Plaintiff Schmidt's documents in Relativity database and draft ROG, RPO responses including new information from former conservator M. Gallagher
Brian Umpiere	5/29/2020	2.30	\$925.00	\$2,127.50	Telephone conversation with (current conservator) H. Fisher re Plaintiff Schmidt's experience at Brookdale; revise written discovery responses based on new information
Brian Umpiere	5/29/2020	0.40	\$925.00	\$270.00	Review B. Bien-Kahn email and attached materials re class representative discovery responses in advance of team call re same
Brian Umpiere	6/1/2020	0.70	\$925.00	\$647.50	Conference call among team re draft written discovery responses - data/strategy
Brian Umpiere	6/1/2020	0.20	\$925.00	\$185.00	Email to S. Gebhardt (family) re Plaintiff Schmidt, experience at Brookdale, discovery responses, and requesting phone conference
Brian Umpiere	6/1/2020	6.50	\$925.00	\$6,012.50	Draft RPO/ROG responses for Plaintiff Schmidt
Brian Umpiere	6/1/2020	0.20	\$925.00	\$5,755.00	Draft ROG/RPO responses for Plaintiff Schmidt
Brian Umpiere	6/2/2020	0.20	\$925.00	\$185.00	Email correspondence re H. Fisher (Schmidt conservator) re Brookdale personnel at Tracy while R. Schmidt in residence
Brian Umpiere	6/2/2020	4.50	\$925.00	\$4,162.50	Draft ROG/RPO responses for Plaintiff Schmidt
Brian Umpiere	6/3/2020	0.50	\$925.00	\$462.50	Email correspondence with H. Fisher (Schmidt conservator) listing additional questions related to Schmidt ROG/RPO responses
Brian Umpiere	6/3/2020	1.40	\$925.00	\$1,285.00	Telephone conversation with S. Gebhardt (family) re Ralph Schmidt and draft written discovery responses
Brian Umpiere	6/4/2020	0.30	\$925.00	\$277.50	Email correspondence with H. Fisher (Schmidt conservator) re discovery responses and search for responsive documents
Brian Umpiere	6/4/2020	4.20	\$925.00	\$3,885.00	Draft ROG/RPO responses for Plaintiff Schmidt
Kathryn Stehner	6/4/2020	1.70	\$1,300.00	\$2,110.00	Review draft discovery responses for Plaintiff Schmidt
Brian Umpiere	6/5/2020	3.40	\$925.00	\$3,145.00	Draft ROG/RPO responses for Plaintiff Schmidt
Brian Umpiere	6/9/2020	0.30	\$925.00	\$277.50	Review internal assessment data email to D. Marks concerning databases
Brian Umpiere	6/9/2020	0.50	\$925.00	\$462.50	Review draft letter brief re emergency evacuation and transportation policies and cover email re same
Kathryn Stehner	6/12/2020	1.20	\$1,300.00	\$2,860.00	Review draft discovery responses for Plaintiff Schmidt
Brian Umpiere	6/12/2020	0.40	\$925.00	\$370.00	Email correspondence with Plaintiff Schmidt's representatives re document collection and production
Brian Umpiere	6/12/2020	0.40	\$925.00	\$370.00	Review M. Johnson email update on assessment data production and meet and confer efforts re same
Kathryn Stehner	6/13/2020	0.80	\$1,300.00	\$2,390.00	Email to B. Umpiere re draft Schmidt discovery responses and phone call re same
Kathryn Stehner	6/13/2020	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpiere status of Schmidt / all Plaintiff's discovery and Defendants' production of resident assessment data / staffing formula
Brian Umpiere	6/15/2020	0.30	\$925.00	\$277.50	Internal email correspondence regarding potential data expert and contact by defense counsel
Brian Umpiere	6/15/2020	0.60	\$925.00	\$555.00	Discuss with K. Stehner status of Schmidt / all Plaintiff's discovery and Defendants' production of resident assessment data / staffing formula
Brian Umpiere	6/15/2020	0.80	\$925.00	\$714.00	Email correspondence with M. Gallagher (former conservator) re search for Plaintiff Schmidt documents responsive to Brookdale's document requests
Brian Umpiere	6/22/2020	0.80	\$925.00	\$740.00	Review Plaintiff Schmidt documents received from Conservator Fisher
Brian Umpiere	6/23/2020	0.50	\$925.00	\$462.50	Review email correspondence with defense counsel re further attempts to obtain assessment data for staffing analysis
Brian Umpiere	6/24/2020	0.70	\$925.00	\$647.50	Email correspondence with G. Wallace regarding and attaching ESI search terms from similar understanding class
Brian Umpiere	6/24/2020	0.30	\$925.00	\$277.50	Review email correspondence re further updates on production of usable resident assessment data
Kathryn Stehner	6/30/2020	0.50	\$1,300.00	\$650.00	Review B. Umpiere email correspondence re ESI discovery bottleneck and Defendants' responses to questions about assessment software capabilities
Kathryn Stehner	7/1/2020	0.30	\$1,300.00	\$390.00	Meet with B. Umpiere re Defendants' responses to questions about assessment software capabilities
Kathryn Stehner	7/1/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpiere re discovery status/strategy
Brian Umpiere	7/7/2020	0.50	\$925.00	\$462.50	Review and comment re M. Johnson email re proposal to restart and obtain ESI discovery
Brian Umpiere	7/7/2020	0.50	\$925.00	\$462.50	Review defense response to targeted questions on assessment data production and capabilities and internal emails re same
Brian Umpiere	7/10/2020	0.10	\$925.00	\$92.50	Email correspondence with M. Gallagher re responsive Schmidt documents for review/production
Brian Umpiere	7/10/2020	0.30	\$925.00	\$277.50	Review proposals for discovery conference with Magistrate Judge Beebe
Brian Umpiere	7/17/2020	2.80	\$925.00	\$2,590.00	Draft / edit ROG/RPO responses for Plaintiff Schmidt
Brian Umpiere	7/20/2020	0.20	\$925.00	\$185.00	Forward to team form of verification with language regarding reliance on information obtained from attorneys
Brian Umpiere	7/20/2020	0.80	\$925.00	\$714.00	Draft / edit ROG/RPO responses for Plaintiff Schmidt
Brian Umpiere	7/20/2020	0.50	\$925.00	\$462.50	Team conference call re Plaintiff discovery response status and strategy
Brian Umpiere	7/22/2020	0.30	\$925.00	\$277.50	Phone call with Mary Gallagher (former conservator) re search for responsive documents relevant to Plaintiff Schmidt
Brian Umpiere	7/27/2020	0.10	\$925.00	\$92.50	Email to M. Gallagher re search for responsive documents relevant to Plaintiff Schmidt
Brian Umpiere	7/27/2020	1.00	\$925.00	\$925.00	Review Brookdale's proposed ESI search terms; compare to Plaintiff's list
Kathryn Stehner	7/30/2020	0.10	\$1,300.00	\$130.00	Review B. Umpiere email re Defendants' responses to questions about assessment software capabilities
Kathryn Stehner	7/30/2020	0.40	\$1,300.00	\$520.00	Meet with B. Umpiere re Defendants' responses to questions about assessment software capabilities
Brian Umpiere	7/30/2020	0.80	\$925.00	\$714.00	Review Brookdale's proposed ESI search terms and compare to Plaintiff's list (conf'd); email to B. Umpiere re same
Brian Umpiere	8/3/2020	2.10	\$925.00	\$1,942.50	Review G. Wallace edits to draft discovery responses and confirm same to Schmidt responses as necessary
Brian Umpiere	8/6/2020	4.50	\$925.00	\$4,162.50	Finalize operative draft of Plaintiff Schmidt ROG/RPO responses to G. Wallace for review, comment
Brian Umpiere	8/7/2020	0.60	\$925.00	\$555.00	Prepare drafts of Schmidt ROG/RPO responses for conservators Fisher/Gallagher; send with explanatory transmittal email for review highlighting key areas to consider
Brian Umpiere	8/10/2020	7.80	\$925.00	\$7,215.00	Review G. Wallace comments re proposed ESI search terms; incorporate into draft Schmidt RPO responses as applicable; finalize draft and circulate to team for review/comment
Brian Umpiere	8/10/2020	1.00	\$925.00	\$925.00	Finalize draft Schmidt ROG responses incorporating G. Wallace edits/answering questions; recirculate for review/comment
Brian Umpiere	8/10/2020	0.60	\$925.00	\$555.00	Review draft discovery letter brief re production of audit documents
Brian Umpiere	8/11/2020	0.20	\$925.00	\$185.00	Meet with B. Umpiere re status of ESI search term negotiations and discovery re dates of facility construction / alteration
Brian Umpiere	8/11/2020	0.10	\$925.00	\$92.50	Further edits to draft Schmidt ROG responses; email to team re Bates number citations
Brian Umpiere	8/11/2020	0.10	\$925.00	\$92.50	Email to M. Gallagher (former conservator) re Schmidt document collection
Kathryn Stehner	8/12/2020	1.20	\$1,300.00	\$1,560.00	Review final drafts of Schmidt discovery responses
Brian Umpiere	8/12/2020	0.50	\$925.00	\$462.50	Discuss final drafts of Schmidt discovery responses with B. Umpiere
Brian Umpiere	8/12/2020	7.50	\$925.00	\$6,937.50	Further edits to Schmidt ROG/RPO responses; email correspondence with H. Fisher (Schmidt conservator) re same, including verification forms
Brian Umpiere	8/12/2020	0.30	\$925.00	\$277.50	Review defense email proposal on ESI search terms
Brian Umpiere	8/13/2020	0.50	\$925.00	\$462.50	Finalize Plaintiff Schmidt ROG responses and verification and forward to co-counsel for final formatting and service
Brian Umpiere	8/13/2020	0.20	\$925.00	\$185.00	Further edits to Schmidt RPOs and circulate to team with additional questions before finalizing email with A. Xu re same
Brian Umpiere	8/13/2020	0.50	\$925.00	\$462.50	Review M. Johnson's summary of meet and confer re payroll data production
Brian Umpiere	8/14/2020	0.30	\$925.00	\$277.50	Finalize Schmidt RPO responses; email correspondence with team re outstanding questions therein; forward to RBGO for service
Brian Umpiere	8/24/2020	1.10	\$925.00	\$1,017.50	Team call re pre-proposed Plaintiff documents for production and reductions; emails with R. Bonner re review/revisions of Plaintiff Schmidt's documents
Brian Umpiere	8/27/2020	0.90	\$925.00	\$832.50	Review/comment on Plaintiff's / draft ESI search terms
Brian Umpiere	8/27/2020	0.80	\$925.00	\$740.00	Review Schmidt documents to be produced in discovery for privilege/reductions; email to R. Bonner re same
Brian Umpiere	8/28/2020	0.50	\$925.00	\$462.50	Final review/reductions to Schmidt documents to be produced in discovery and notes re same; forward to R. Bonner to prepare for production
Brian Umpiere	9/2/2020	0.30	\$925.00	\$277.50	Review M. Johnson email to defense summarizing Plaintiff's understanding of status of discovery re construction and alteration of Brookdale's facilities in CA
Brian Umpiere	9/3/2020	0.40	\$925.00	\$370.00	Review defense response to Plaintiff's email re status of construction / alteration discovery
Kathryn Stehner	9/10/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpiere re status of ESI search term negotiations and discovery re dates of facility construction / alteration
Brian Umpiere	9/10/2020	0.70	\$925.00	\$647.50	Meet with K. Stehner re status of ESI search term negotiations and discovery re dates of facility construction / alteration
Brian Umpiere	9/10/2020	0.80	\$925.00	\$714.00	Review further edits to ESI search terms; emails with team re same
Kathryn Stehner	9/16/2020	0.20	\$1,300.00	\$260.00	Meet with B. Umpiere email re edits to Brookdale's proposed search terms and custodians and proposal re same
Kathryn Stehner	9/16/2020	0.20	\$1,300.00	\$260.00	Email to B. Umpiere re edits to Brookdale's proposed search terms and custodians and proposal re same
Brian Umpiere	9/16/2020	1.80	\$925.00	\$1,665.00	Review additional edits to Brookdale's proposed search terms and custodians and proposal re same
Brian Umpiere	9/16/2020	0.50	\$925.00	\$462.50	Review draft response to discovery meet and confer letter re Plaintiff's responses to first set of requests for documents
Brian Umpiere	9/29/2020	0.50	\$925.00	\$462.50	Review defense response to Plaintiff's meet and confer letter re Plaintiff's responses to first set of document requests
Kathryn Stehner	10/1/2020	0.40	\$1,300.00	\$520.00	Meet with B. Umpiere for update on meet and confer on Plaintiff's discovery responses and proposal to extend class certification deadline 6 months
Brian Umpiere	10/1/2020	0.30	\$925.00	\$277.50	Review email correspondence re proposal to extend deadline to move for class certification by 6 months
Brian Umpiere	10/1/2020	0.30	\$925.00	\$277.50	Discussion with K. Stehner re continuing class certification briefing schedule
Brian Umpiere	10/6/2020	0.40	\$925.00	\$370.00	Review draft stipulation and edit re proposal re new class certification schedule
Brian Umpiere	10/6/2020	0.30	\$925.00	\$277.50	Email to M. Johnson re status of efforts to obtain documents from Plaintiff Schmidt's previous conservator Mary Gallagher
Brian Umpiere	10/9/2020	1.50	\$925.00	\$1,387.50	Complete list of documents/sources detailing Ralph Schmidt's disabilities
Kathryn Stehner	10/14/2020	0.20	\$1,300.00	\$260.00	Meet with B. Umpiere re status of negotiations on class certification schedule
Brian Umpiere	10/16/2020	0.40	\$925.00	\$370.00	Review further correspondence re preparations for case / class certification schedule
Brian Umpiere	10/16/2020	0.20	\$925.00	\$185.00	Discussion with K. Stehner re continuing class certification briefing schedule
Brian Umpiere	10/29/2020	0.40	\$925.00	\$370.00	Review meet and confer correspondence from defense re document custodians and ESI search terms
Kathryn Stehner	10/30/2020	0.50	\$1,300.00	\$650.00	Discuss status of written discovery negotiations, including custodians and search terms, and impact on class certification with B. Umpiere
Brian Umpiere	10/30/2020	0.50	\$925.00	\$462.50	Update K. Stehner re status of discovery negotiations, including custodians and search terms, and impact on class certification
Brian Umpiere	11/4/2020	1.80	\$925.00	\$1,665.00	Review meet and confer correspondence in preparation for telephonic discovery meet and confer with G. Wallace; email to G. Wallace re proposed custodians
Brian Umpiere	11/6/2020	0.50	\$925.00	\$462.50	Phone call with G. Wallace in preparation for discovery meet and confer with defense re document custodians
Brian Umpiere	11/6/2020	0.70	\$925.00	\$647.50	Telephonic meet and confer with G. Wallace, M. Jacobson, G. Muzman re document custodians, production of documents evidencing Plaintiff's disabilities, requests for communications that may implicate privilege, and other specific interrogatories
Brian Umpiere	11/10/2020	0.40	\$925.00	\$370.00	Prepare notes of 11/6 discovery meet and confer for email to G. Wallace re review and comment
Brian Umpiere	11/16/2020	0.40	\$925.00	\$370.00	Review defense letter following today's discovery meet and confer
Kathryn Stehner	11/17/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpiere re discovery MNC re Plaintiff's discovery responses
Brian Umpiere	11/17/2020	0.40	\$925.00	\$370.00	Meeting with K. Stehner re discovery MNC re Plaintiff's discovery responses
Brian Umpiere	11/17/2020	0.40	\$925.00	\$370.00	Email to G. Wallace re privilege log and attaching exemplar used in similar understanding litigation
Brian Umpiere	11/17/2020	0.50	\$925.00	\$462.50	Team call re Plaintiff's supplemental discovery responses following meet and confer with defense re same
Brian Umpiere	11/23/2020	0.70	\$925.00	\$647.50	Email to team summarizing process for compiling privilege log used in similar understanding litigation and attaching exemplar documents
Kathryn Stehner	11/23/2020	1.30	\$1,300.00	\$2,390.00	Discuss potential supplemental discovery responses from Plaintiff with B. Umpiere
Brian Umpiere	11/16/2020	0.40	\$925.00	\$370.00	Emails with R. Steyer re compilation of privilege log
Brian Umpiere	11/16/2020	0.40	\$925.00	\$370.00	Review internal correspondence re potential additional document custodians
Kathryn Stehner	11/20/2020	0.40	\$1,300.00	\$650.00	Meet with B. Umpiere re status of search terms negotiations and counter-proposal on further discovery of Plaintiff's
Brian Umpiere	11/20/2020	0.30	\$925.00	\$277.50	Review draft meet and confer letter re ESI and search terms; email to M. Johnson re same
Brian Umpiere	11/20/2020	0.20	\$925.00	\$185.00	Forward email regarding Plaintiff's counter-proposal for discovery seeking Plaintiff's email addresses and social media user names, including proposed revision
Brian Umpiere	11/20/2020	0.40	\$925.00	\$370.00	Meet with K. Stehner re status of search terms negotiations and counter-proposal on further discovery of Plaintiff's
Kathryn Stehner	12/1/2020	1.30	\$1,300.00	\$2,390.00	Discuss draft of co-counsel meeting re understanding discovery
Brian Umpiere	12/1/2020	1.10	\$925.00	\$1,017.50	Team discovery call re status / strategy / next steps
Brian Umpiere	12/1/2020	0.30	\$925.00	\$277.50	Email correspondence to Schmidt conservators H. Fisher and M. Gallagher re supplemental interrogatory responses
Brian Umpiere	12/4/2020	0.40	\$925.00	\$370.00	Prepare for follow-up phone call with H. Fisher (Schmidt conservator) re supplemental ROG responses
Brian Umpiere	12/4/2020	0.50	\$925.00	\$462.50	Telephone call with H. Fisher (Schmidt conservator) re supplemental ROG responses and production of documents
Brian Umpiere	12/7/2020	0.40	\$925.00	\$370.00	Review defense response to targeted questions regarding production of payroll/timekeeping data
Brian Umpiere	12/8/2020	0.60	\$925.00	\$555.00	Discovery team call re Plaintiff document productions and search/review for additional responsive documents - strategy and protocol
Brian Umpiere	12/9/2020	0.40	\$925.00	\$370.00	Phone call with G. Wallace re proposed damages discovery
Brian Umpiere	12/9/2020	2.30	\$925.00	\$2,127.50	Draft written discovery re Plaintiff's damages
Kathryn Stehner	12/9/2020	0.60	\$1,300.00	\$780.00	Review Plaintiff Schmidt draft supplemental discovery responses
Brian Umpiere	12/9/2020	2.00	\$925.00	\$1,850.00	Review written discovery propounded to date re new damages-oriented requests; finalize draft requests; email to G. Wallace re same
Brian Umpiere	12/9/2020	1.00	\$925.00	\$925.00	Draft supplemental Schmidt ROG responses and review previous drafts and notes re same; email to H. Fisher (Schmidt conservator) re same
Kathryn Stehner	12/10/2020	0.20	\$1,300.00	\$260.00	Discuss with B. Umpiere draft supplemental discovery responses re damages for Plaintiff Schmidt
Brian Umpiere	12/10/2020	0.80	\$925.00	\$740.00	Further edits to supplemental Schmidt ROG response re damages including review notes re move in fees, medication fees
Brian Umpiere	12/10/2020	4.20	\$925.00	\$3,877.50	Review documents provided by H. Fisher (Schmidt conservator) re Plaintiff Schmidt for possible supplemental production; email to H. Fisher re same
Brian Umpiere	12/16/2020	2.30	\$925.00	\$2,127.50	Further edits to supplemental Schmidt ROG responses, circulate among team for review
Brian Umpiere	12/16/2020	1.00	\$925.00	\$925.00	Discovery team call re status of Plaintiff's supplemental discovery responses
Brian Umpiere	12/16/2020	0.30	\$925.00	\$277.50	Phone call with G. Wallace re damages discovery
Brian Umpiere	12/16/2020	0.40	\$925.00	\$370.00	Review M. Johnson email re combined review of assessment and staffing data
Kathryn Stehner	12/17/2020	0.30	\$1,300.00	\$390.00	

Kathryn Steiner	12/23/2020	0.40	\$1,300.00	\$920.00	Review B. Umpierre memo re status of discovery owed and owing and going forward plan
Brian Umpierre	12/23/2020	0.40	\$920.00	\$370.00	Review and comment re email to defense requesting status of outstanding discovery items
Brian Umpierre	12/23/2020	0.20	\$920.00	\$185.00	Review Plaintiff's portion of meet and confer letter re Brookdale's motion to compel; email to M. Johnson re same
Brian Umpierre	1/4/2021	0.30	\$920.00	\$277.50	Review email summary of contents of latest document production
Brian Umpierre	1/5/2021	0.30	\$920.00	\$277.50	Spot review of contents of Brookdale's 12/31/20 ESU production
Brian Umpierre	1/11/2021	2.50	\$920.00	\$2,312.50	Email to M. Johnson re status of documents received from Plaintiff Schmidt's conservators in response to Brookdale's document requests and forward same
Kathryn Steiner	1/13/2021	0.50	\$1,300.00	\$950.00	Meet with L. Umpierre re discovery / class certification issues
Brian Umpierre	1/13/2021	0.50	\$920.00	\$462.50	Review email summary of discovery meet and confer re pendant data, task time info, move-in/move-out dates, and floor plans
Brian Umpierre	1/13/2021	0.30	\$920.00	\$277.50	Discuss discovery status and plan with K. W. Steiner
Brian Umpierre	1/14/2021	0.30	\$920.00	\$277.50	Universal email re Brookdale's production of Labor Detail Reports
Brian Umpierre	1/20/2021	0.40	\$920.00	\$370.00	Review email re current status of discovery and outstanding items / timeline
Brian Umpierre	1/25/2021	0.40	\$920.00	\$370.00	Email correspondence re CA requirements for maintaining pendant response data
Kathryn Steiner	1/27/2021	0.30	\$1,300.00	\$390.00	Review email correspondence re class periods for different proposed subclasses
Brian Umpierre	1/27/2021	0.30	\$920.00	\$277.50	Email to K. Steiner re class periods for different subclasses as reflected in Complaint
Brian Umpierre	1/28/2021	0.50	\$920.00	\$462.50	Review A. Xu email and memos re Brookdale potential depositions, including info on A. Kahn, Executive Director at BKD Tracy
Kathryn Steiner	1/29/2021	0.90	\$1,300.00	\$1,170.00	Meet with B. Umpierre re executive director deposition strategy
Brian Umpierre	1/29/2021	0.50	\$920.00	\$550.00	Review index of documents pulled for ED depositions in prep for team meeting re same
Brian Umpierre	1/29/2021	0.50	\$920.00	\$550.00	Meeting with K. Steiner re Executive Director deposition strategy
Brian Umpierre	2/1/2021	0.50	\$920.00	\$462.50	Team call re depositions of defendants' witnesses - strategy and assignments
Brian Umpierre	2/1/2021	2.00	\$920.00	\$1,850.00	Prepare searches for Kiehn deposition (ED at Brookdale Tracy) including custodial file and spot check for responsiveness
Brian Umpierre	2/2/2021	1.00	\$920.00	\$820.00	Draft damages re: depositions; forward same to G. Wallace for review, comment
Brian Umpierre	2/3/2021	0.20	\$920.00	\$185.00	Email to M. Johnson re Kiehn deposition and scheduling same
Brian Umpierre	2/3/2021	0.30	\$920.00	\$277.50	Review draft set of RODs (Carlson Set 1) re payments and sufficiency of same for our expert; email to M. Johnson re same
Brian Umpierre	2/3/2021	2.00	\$920.00	\$1,850.00	Kiehn deposition preparation - document review and outline
Brian Umpierre	2/3/2021	0.50	\$920.00	\$462.50	Review D. Marks email re missing punch detail data and other payroll data issues - re understanding analysis
Brian Umpierre	2/4/2021	0.40	\$920.00	\$370.00	Email to M. Johnson re revised RODs re basic service fees and fees for select / therapeutic services
Brian Umpierre	2/6/2021	1.50	\$920.00	\$1,387.50	Kiehn deposition preparation - document review and outline
Brian Umpierre	2/6/2021	0.40	\$920.00	\$370.00	Forward to M. Johnson briefing in similar and/or installing infallible on work product protection for communications and documents with/from putative class members
Brian Umpierre	2/8/2021	0.50	\$920.00	\$462.50	Team call re depositions, discovery, status
Brian Umpierre	2/8/2021	2.50	\$920.00	\$2,312.50	Kiehn deposition preparation - document review and outline
Kathryn Steiner	2/9/2021	0.50	\$1,300.00	\$950.00	Meet with B. Umpierre re executive director depo prep / status
Brian Umpierre	2/9/2021	0.20	\$920.00	\$7,585.00	Kiehn deposition preparation - document review and outline
Brian Umpierre	2/10/2021	5.50	\$920.00	\$5,457.50	Kiehn deposition preparation - document review and outline
Brian Umpierre	2/11/2021	3.00	\$920.00	\$2,775.00	Kiehn deposition preparation - document review and outline
Brian Umpierre	2/11/2021	0.50	\$920.00	\$462.50	Review Plaintiff's portion of discovery letter brief and production of site inspection photos taken by expert
Brian Umpierre	2/12/2021	3.20	\$920.00	\$2,960.00	Review Kiehn saved searches re deposition preparation
Brian Umpierre	2/14/2021	0.50	\$920.00	\$462.50	Review M. Johnson email to D. Marks et al. re sufficiency of data for completion of staffing analysis and review PSP interpretive guidelines
Kathryn Steiner	2/15/2021	0.40	\$1,300.00	\$920.00	Review memo re sufficiency of data for completion of staffing analysis
Brian Umpierre	2/15/2021	0.50	\$920.00	\$2,312.50	Review Kiehn saved searches re deposition preparation
Brian Umpierre	2/16/2021	4.50	\$920.00	\$4,162.50	review Kiehn saved searches re deposition preparation
Brian Umpierre	2/16/2021	0.30	\$920.00	\$277.50	team call re deposition preparation / schedule
Brian Umpierre	2/16/2021	0.30	\$920.00	\$277.50	review internal correspondence re deposition schedule strategy
Brian Umpierre	2/16/2021	0.30	\$920.00	\$277.50	review Plaintiff's portion of discovery letter brief seeking to compel ED Depositions
Brian Umpierre	2/17/2021	0.40	\$920.00	\$370.00	team call re deposition scheduling
Brian Umpierre	2/17/2021	0.40	\$920.00	\$370.00	review / comment on draft 30(b)(6) deposition notice topics
Brian Umpierre	2/17/2021	2.50	\$920.00	\$2,312.50	Kiehn deposition preparation - complete document list
Brian Umpierre	2/18/2021	0.20	\$920.00	\$185.00	review assignments for 30(b)(6) deposition tasks
Brian Umpierre	2/18/2021	5.40	\$920.00	\$4,995.00	Kiehn deposition preparation - complete hot document list including job descriptions, policies/procedures
Kathryn Steiner	2/18/2021	0.50	\$1,300.00	\$950.00	Meet with B. Umpierre re deposition schedule and strategy - executive directors and 30(b)(6)
Brian Umpierre	2/18/2021	1.70	\$920.00	\$1,572.50	Team call re document review and 30(b)(6) deposition preparation
Brian Umpierre	2/19/2021	7.10	\$920.00	\$6,567.50	Kiehn depo prep - targeted search/review re Service Alignment and policies/procedures regarding same
Brian Umpierre	2/19/2021	0.40	\$920.00	\$370.00	phone call with A. Steiner re deposition schedule and strategy - executive directors and 30(b)(6)
Kathryn Steiner	2/19/2021	1.70	\$1,300.00	\$2,210.00	review draft Kiehn deposition outline and key documents
Brian Umpierre	2/23/2021	1.50	\$920.00	\$462.50	review M. Johnson email to Marks et al. re newly produced staffing info including Brookdale norms and benchmark calculations / standards
Brian Umpierre	2/24/2021	0.20	\$920.00	\$185.00	phone call with A. Xu re substituting deceased plaintiff
Brian Umpierre	2/25/2021	0.20	\$920.00	\$185.00	email to S. Colby re substituting for deceased plaintiff
Kathryn Steiner	2/26/2021	0.30	\$1,300.00	\$390.00	Discuss Kiehn deposition preparation with B. Umpierre
Brian Umpierre	2/26/2021	0.40	\$920.00	\$370.00	review spreadsheet overview of Brookdale's document production to date
Kathryn Steiner	3/6/2021	2.20	\$1,300.00	\$2,860.00	review revised Kiehn deposition outline and key documents
Brian Umpierre	3/6/2021	1.50	\$920.00	\$1,387.50	Kiehn deposition preparation - document review and outline
Brian Umpierre	3/8/2021	0.40	\$920.00	\$370.00	review Marks' analysis of unique residents who require visual or mobility aids
Brian Umpierre	3/9/2021	1.00	\$920.00	\$920.00	discovery meet and confer session with M. Johnson and defense re Brookdale's responses and objections to Reg Set 2
Brian Umpierre	3/10/2021	0.80	\$920.00	\$740.00	Zoom with court reporting service re upcoming depositions; team meeting re strategy/update for same
Brian Umpierre	3/11/2021	0.40	\$920.00	\$370.00	review Plaintiff's section joint letter brief seeking to compel correspondence to Carlson's RODs; review meet and confer notes re same; email to M. Johnson re same
Brian Umpierre	3/18/2021	0.40	\$920.00	\$370.00	review Atkin depo summary re Kiehn deposition preparation
Brian Umpierre	3/23/2021	0.70	\$920.00	\$647.50	review draft Harris deposition outline re Kiehn deposition preparation
Brian Umpierre	3/24/2021	0.40	\$920.00	\$370.00	review Harris depo summary re Kiehn deposition preparation
Kathryn Steiner	3/25/2021	1.60	\$1,300.00	\$2,080.00	review Atkin deposition summary and Harris deposition outline and summary notes re Kiehn/Executive Director deposition preparation
Brian Umpierre	3/25/2021	0.40	\$920.00	\$370.00	review summary of pendant data subpoena responses
Brian Umpierre	3/26/2021	0.40	\$920.00	\$370.00	review G. Wallace declaration via Rule 7-11 motion re class cert schedule
Brian Umpierre	3/29/2021	0.50	\$920.00	\$462.50	review M. Johnson summary of meet and confer with defense re 30(b)(6) deposition and topics
Kathryn Steiner	3/30/2021	1.00	\$1,300.00	\$1,300.00	call with J. Noe (Kern County DA) re class case, experts
Brian Umpierre	4/2/2021	0.30	\$920.00	\$277.50	review Plaintiff's request for discovery case management conference; email comments to M. Johnson
Brian Umpierre	4/2/2021	0.20	\$920.00	\$185.00	review correspondence re Silverphase subpoena for pendant data
Brian Umpierre	4/2/2021	0.50	\$920.00	\$277.50	review and comment re defense email demanding withdrawal of request for discovery case management conference
Kathryn Steiner	4/6/2021	0.50	\$1,300.00	\$950.00	review email correspondence re Plaintiff's request for discovery conference, 30(b)(6) depo topics, and pendant data requests/responses
Brian Umpierre	4/7/2021	0.20	\$920.00	\$185.00	review A. Xu email summary of discovery meet and confer concerning production of pendant response data
Brian Umpierre	4/7/2021	0.30	\$920.00	\$277.50	review summary of discovery meet and confer with Brookdale re production of pendant response time data
Brian Umpierre	4/9/2021	1.00	\$920.00	\$920.00	GoToMeeting with J. Thornton, G. Wallace, re expert discovery, staffing shortfall analysis
Brian Umpierre	4/9/2021	0.20	\$920.00	\$185.00	review draft A. Xu meet and confer correspondence re Brookdale's production of pendant data
Brian Umpierre	4/9/2021	0.20	\$920.00	\$185.00	review working list of outstanding discovery
Brian Umpierre	4/12/2021	0.30	\$920.00	\$277.50	review staffing-related questions for ED depositions re cross-training / Kiehn deposition preparation
Brian Umpierre	4/12/2021	0.60	\$920.00	\$555.00	review draft A. Xu meet and confer correspondence re Brookdale's deposition and email to M. Johnson re same
Brian Umpierre	4/13/2021	0.30	\$920.00	\$277.50	review draft A. Xu meet and confer correspondence re deficiencies in Brookdale's privilege logs
Kathryn Steiner	4/23/2021	0.40	\$1,300.00	\$620.00	review memos to file re status of expert discovery and staffing shortfall analysis
Brian Umpierre	4/23/2021	0.30	\$920.00	\$277.50	review A. Xu email summary of status of efforts to obtain pendant response data from Brookdale
Brian Umpierre	4/23/2021	0.40	\$920.00	\$370.00	review T. Close email re outstanding discovery and potential motions to compel / areas requiring further follow up
Brian Umpierre	4/23/2021	0.40	\$920.00	\$370.00	review summary email re T. Bust (ED) deposition - Kiehn deposition preparation
Kathryn Steiner	4/23/2021	1.30	\$1,300.00	\$1,360.00	review summary email re T. Bust (ED) deposition - Kiehn deposition preparation
Brian Umpierre	4/23/2021	0.30	\$920.00	\$277.50	review Plaintiff's portion of draft discovery letter brief seeking to compel production of task time studies and labor benchmarks; email to M. Johnson re same
Brian Umpierre	4/26/2021	0.30	\$920.00	\$277.50	review emails to defense re Brookdale's deficient production of emails from Brookdale's K. Bowman
Kathryn Steiner	4/27/2021	0.50	\$1,300.00	\$620.00	discussion with B. Umpierre re CMA re RCE and assisted living in CA - re background for M. Johnson depo prep
Brian Umpierre	4/27/2021	0.50	\$920.00	\$462.50	phone call with M. Johnson re CCRP re RCE and assisted living in CA - re depo prep; emails with K. Steiner re same
Brian Umpierre	4/27/2021	0.50	\$920.00	\$462.50	email/phone call with M. Johnson re CCRP vs ALF re preparation for Toomer deposition
Brian Umpierre	4/28/2021	0.30	\$920.00	\$277.50	review G. Grunfeld email re plan for plaintiff's substitution issue
Kathryn Steiner	4/29/2021	1.00	\$1,300.00	\$1,360.00	conference call with RBOB re substituting successors in interest for deceased plaintiffs and review emails re same
Brian Umpierre	4/29/2021	0.50	\$920.00	\$462.50	conference call re substituting successors in interest for deceased plaintiffs and review emails re same
Brian Umpierre	4/30/2021	0.30	\$920.00	\$277.50	review Plaintiff's portion of draft letter brief re production of post-April 2020 ESU/Bowman emails
Kathryn Steiner	4/30/2021	1.50	\$1,300.00	\$1,950.00	review Brookdale's motion to deny class certification and supporting papers; discussion with B. Umpierre re same
Kathryn Steiner	5/1/2021	0.60	\$1,300.00	\$780.00	review motion for substitution of deceased Pt's and supporting papers; discussion with B. Umpierre re same
Brian Umpierre	5/1/2021	2.00	\$920.00	\$1,850.00	review Brookdale's motion to deny class certification and supporting papers
Brian Umpierre	5/1/2021	1.00	\$920.00	\$920.00	review motion to deny class certification; discussion with KAD re same
Kathryn Steiner	5/1/2021	0.40	\$1,300.00	\$620.00	review order denying motion to deny class certification
Brian Umpierre	5/3/2021	0.20	\$1,300.00	\$260.00	discuss order denying motion to deny class certification with B. Umpierre
Brian Umpierre	5/3/2021	0.30	\$920.00	\$277.50	review Order denying motion to deny class certification
Brian Umpierre	5/3/2021	0.40	\$920.00	\$370.00	review M. Johnson discovery meet and confer correspondence re Brookdale stonewalling
Brian Umpierre	5/4/2021	0.60	\$920.00	\$555.00	review meet and confer correspondence re production of task time, labor benchmarks, staffing norms
Brian Umpierre	5/4/2021	1.00	\$920.00	\$920.00	review "ombuds" discovery letter to defense seeking 7 categories of documents
Brian Umpierre	5/6/2021	0.70	\$920.00	\$647.50	emails with B. Bien-Kahn and W. Stein re case investigator
Brian Umpierre	5/6/2021	1.20	\$920.00	\$1,105.00	emails and phone call with B. Bien-Kahn re investigator outreach
Brian Umpierre	5/7/2021	0.60	\$920.00	\$555.00	team call re status of outstanding projects, post class certification denial and renewed motion for same
Brian Umpierre	5/7/2021	0.30	\$920.00	\$277.50	phone call with B. Bien-Kahn re case investigator
Kathryn Steiner	5/10/2021	0.50	\$1,300.00	\$950.00	meet with B. Umpierre re outstanding discovery and forthcoming joint statements / MTICs including staffing analysis data and labor benchmarks
Brian Umpierre	5/10/2021	0.20	\$920.00	\$185.00	review Brookdale letter responding to meet and confer letter re privilege log deficiencies
Brian Umpierre	5/10/2021	1.50	\$920.00	\$1,387.50	draft script/questions for investigator calls with former employees; forward same to B. Bien-Kahn
Brian Umpierre	5/11/2021	0.30	\$920.00	\$277.50	review meet and confer correspondence re outstanding discovery issues, impasse, and further meet and confer efforts
Brian Umpierre	5/11/2021	0.70	\$920.00	\$647.50	team Zoom re status/update and strategy following denial of class certification / mechanics of renewed motion
Brian Umpierre	5/14/2021	0.50	\$920.00	\$462.50	review email to Plaintiff's portion of discovery letter brief re production of post-April 2021 ESU
Brian Umpierre	5/14/2021	0.40	\$920.00	\$370.00	review email to defense re analysis of production of move-in/move-out and replacement assessment data and missing information
Brian Umpierre	5/14/2021	0.40	\$920.00	\$370.00	review M. Johnson email to defense re status of outstanding discovery issues and impasse
Brian Umpierre	5/14/2021	0.30	\$920.00	\$277.50	review email to Plaintiff's portion of discovery letter brief on employee-related documents
Brian Umpierre	5/14/2021	0.20	\$920.00	\$185.00	review M. Johnson email re conduct/agreement on 30(b)(6) depo topics/schedule
Brian Umpierre	5/17/2021	1.80	\$920.00	\$1,665.00	review motion for substitution of deceased plaintiffs and supporting papers; email to G. Grunfeld re same
Brian Umpierre	5/17/2021	0.30	\$920.00	\$277.50	emails with B. Bien-Kahn re case investigator roles
Brian Umpierre	5/18/2021	0.40	\$920.00	\$370.00	review Plaintiff's portion of discovery letter brief re production of compel the service alignment reports and underlying data; emails with M. Johnson and T. Close re same
Brian Umpierre	5/18/2021	0.40	\$920.00	\$370.00	review Brookdale letter re allegedly improper contacts with putative class members and protective order
Brian Umpierre	5/19/2021	0.40	\$920.00	\$370.00	review summary of 5/19 discovery meet and confer session
Brian Umpierre	5/19/2021	4.00	\$920.00	\$3,700.00	30(b)(6) depo prep (ownership/control) - review notices, topics, compile documents for review
Brian Umpierre	5/21/2021	6.90	\$920.00	\$6,382.50	30(b)(6) depo prep (ownership/control) - review pertinent documents
Brian Umpierre	5/21/2021	0.30	\$920.00	\$277.50	review Plaintiff's letter disputing allegations of improper communications with putative class members as alleged by Defendants
Brian Umpierre	5/24/2021	8.00	\$920.00	\$7,400.00	30(b)(6) depo prep - draft outline (topic 3 - ownership/control)
Brian Umpierre	5/24/2021	0.50	\$920.00	\$462.50	30(b)(6) depo prep - topic 3 (ownership/control) - further ethics to outline, review G. Wallace emails re ADA and owner/operator liability; Bowman declaration and Carlson ROD response; phone call with M. Johnson re same
Kathryn Steiner	5/26/2021	1.50	\$1,300.00	\$1,950.00	meet with B. Umpierre re preparation for 30(b)(6) deposition on ownership issues
Brian Umpierre	5/26/2021	5.70	\$920.00	\$5,272.50	further edits to 30(b)(6) topic 3 deposition outline; forward to M. Johnson and G. Wallace for comment
Brian Umpierre	5/26/2021	1.20	\$920.00	\$1,110.00	deposition preparation with K. Steiner re 30(b)(6) re ownership, control
Brian Umpierre	5/27/2021	0.20	\$920.00	\$185.00	emails with K. Steiner re Bowen (30(b)(6)) remote depo scheduling and documents
Brian Umpierre	5/27/2021	7.30	\$920.00	\$6,732.50	further edits to 30(b)(6) topic 3 (ownership/control) deposition outline; emails with M. Johnson re same and further materials for review
Brian Umpierre	5/28/2021	6.10	\$920.00	\$5,642.50	review additional materials bearing re ownership/operations, including consolidated data spreadsheet and identification of facilities therein; develop questions on consolidated ownership; further outline edits re same, re Bowen 30(b)(6) ownership/control deposition preparation
Brian Umpierre	5/28/2021	0.50	\$920.00	\$462.50	review email to Plaintiff's portion of discovery letter brief on class certification
Brian Umpierre	5/28/2021	0.20	\$920.00	\$185.00	emails with K. Steiner re remote deposition documents/submits
Kathryn Steiner	5/31/2021	3.50	\$1,300.00	\$4,550.00	review draft 30(b)(6) deposition outline re ownership, control and key documents re same
Brian Umpierre	5/31/2021	0.30	\$920.00	\$277.50	review M. Johnson outline of draft 30(b)(6) ownership/control deposition outline; further edits and development
Brian Umpierre	6/1/2021	0.70	\$920.00	\$647.50	emails with US Legal Support re remote deposition protocol and test run
Kathryn Steiner	6/2/2021	0.30	\$1,300.00	\$370.00	phone call with B. Umpierre re 30(b)(6) deposition strategy
Brian Umpierre	6/2/2021	8.40	\$920.00	\$7,790.00	30(b)(6) (own/operator) deposition preparation - finalize outline, prepare exhibits, discussion with M. Johnson re same/strategy, including newly produced documents/spreadsheet re facility ownership
Kathryn Steiner	6/3/2021	0.40	\$1,300.00	\$620.00	review B. Umpierre email re depo testimony update from 30(b)(6) depositions on ownership/operations issues
Kathryn Steiner	6/3/2021	0.60	\$1,300.00	\$780.00	discuss outcome of 30(b)(6) deposition with B. Umpierre
Brian Umpierre	6/3/2021	4.00	\$920.00	\$3,700.00	30(b)(6) deposition, topic 3 (own, operator) re witness K. Bowman
Brian Umpierre	6/3/202				

Kathryn Stehner	6/15/2021	0.50	\$1,300.00	\$650.00	phone call with B. Umpierre re further documentation evidencing Brookdale's ownership, operation of RCFEs and designee's further testimony on additional topics
Brian Umpierre	6/15/2021	0.30	\$925.00	\$277.50	email to US Legal ordering expedited 30(b)(6) topic 3 (own/operate) deposition transcript
Brian Umpierre	6/15/2021	0.40	\$925.00	\$277.50	review J. Yellin memo re conversation with former Executive Director Care Baker
Brian Umpierre	6/15/2021	0.20	\$925.00	\$185.00	review meet and confer letter to defense addressing outstanding discovery
Brian Umpierre	6/17/2021	0.40	\$925.00	\$370.00	email email summary of 30(b)(6) deposition topic 10
Brian Umpierre	6/18/2021	0.30	\$925.00	\$277.50	email to B. Bien Kahn attaching class representative declarations submitted in similar understanding case to support motion for class certification
Brian Umpierre	6/20/2021	0.40	\$925.00	\$370.00	review summary of today's discovery meet and confer re production of performance review/corrective actions; operations plans; personnel records; ownership/management; move-in/move-out and assessment data; labor detail reports; Rubin depts; 2020 ESI; pendant data
Brian Umpierre	7/12/2021	0.20	\$925.00	\$185.00	email to J. Yellin re supporting class certification declarations from Plaintiff Ralph Schmidt's conservator
Brian Umpierre	7/13/2021	0.60	\$925.00	\$555.00	review newly served chart re Brookdale's ownership interest in CA facilities, re 30(b)(6) deposition topic 3 (own/operate); email to M. Johnson, T. Close re same
Brian Umpierre	7/13/2021	0.40	\$925.00	\$370.00	email to A. Xu re class representative declarations supporting motion for class certification and contents thereof
Brian Umpierre	7/13/2021	0.30	\$925.00	\$277.50	email to team attaching exemplar letter requesting resident file from RCFE, per CA code/regulation
Brian Umpierre	7/19/2021	0.40	\$925.00	\$370.00	emails with H. Fisher (Plaintiff Schmidt conservator) re preparing a declaration as R. Schmidt's conservator to support motion for class certification
Kathryn Stehner	7/21/2021	0.30	\$1,300.00	\$390.00	review email correspondence re production of pendant data and use in staffing analysis
Brian Umpierre	7/21/2021	0.30	\$925.00	\$277.50	review A. Xu email re meeting with D. Marks, J. Thornton re production of pendant data and use in staffing analysis
Kathryn Stehner	7/26/2021	1.60	\$1,300.00	\$2,080.00	review draft class representative declarations in support of class certification
Brian Umpierre	7/26/2021	0.10	\$925.00	\$92.50	email to G. Wallace re Plaintiff R. Schmidt's disabilities
Brian Umpierre	7/30/2021	0.30	\$925.00	\$92.50	email to J. Yellin re Plaintiff Schmidt-related class representative declarations in support of class certification
Brian Umpierre	8/2/2021	0.70	\$925.00	\$185.00	emails to M. Gallagher (former conservator) re declaration as R. Schmidt's former conservator in support of motion for class certification
Kathryn Stehner	8/3/2021	1.80	\$1,300.00	\$2,340.00	review Bowman 30(b)(6) testimony; discuss ownership/operations testimony with C. Lee
Brian Umpierre	8/9/2021	0.30	\$925.00	\$277.50	further emails with H. Gallagher re declaration as R. Schmidt's former conservator in support of motion for class certification
Brian Umpierre	8/9/2021	0.30	\$925.00	\$462.50	review Bowman 30(b)(6) testimony on Brookdale ownership, operation in/outlets, and forward same to K. Stehner
Brian Umpierre	8/9/2021	7.50	\$925.00	\$6,337.50	draft H. Fisher declaration (R. Schmidt conservator) in support of motion for class certification
Kathryn Stehner	8/4/2021	1.10	\$1,300.00	\$1,430.00	review email re confidentiality of Bowman 30(b)(6) testimony; review 6/3 Bowman depo transcript and discuss same with C. Lee; discussion with B. Umpierre re same
Brian Umpierre	8/4/2021	2.20	\$925.00	\$2,035.00	draft H. Fisher declaration (R. Schmidt conservator) in support of motion for class certification; forward same for review/comment; emails with H. Fisher re same; further edits re same
Brian Umpierre	8/4/2021	0.70	\$925.00	\$647.50	team meeting re status, update, and class certification
Brian Umpierre	8/4/2021	0.30	\$925.00	\$277.50	email to K. Stehner re confidentiality of 30(b)(6) deposition transcript re topic 3 (own/operate) and attaching same
Brian Umpierre	8/4/2021	4.00	\$925.00	\$3,700.00	draft H. Gallagher declaration (R. Schmidt former conservator) in support of motion for class certification
Kathryn Stehner	8/4/2021	1.30	\$1,300.00	\$1,390.00	discussions with B. Umpierre re conversations with C. Lee re ownership, control issues
Kathryn Stehner	8/5/2021	0.30	\$1,300.00	\$390.00	discussion with B. Umpierre re status of class certification preparations and related assignments
Kathryn Stehner	8/5/2021	0.70	\$1,300.00	\$910.00	review draft Stehner declaration in motion for class certification; phone call with B. Umpierre re same
Brian Umpierre	8/9/2021	1.80	\$925.00	\$1,665.00	draft H. Gallagher declaration (R. Schmidt former conservator) in support of motion for class certification; forward same for review/comment
Brian Umpierre	8/9/2021	2.30	\$925.00	\$2,127.50	draft K. Stehner declaration in support of motion for class certification; forward to K. Stehner for review/comment
Brian Umpierre	8/9/2021	0.30	\$925.00	\$277.50	emails with A. Xu re [proposed] order granting motion for class certification in similar understanding case
Brian Umpierre	8/11/2021	0.50	\$925.00	\$462.50	team call re status, update, class certification
Brian Umpierre	8/12/2021	0.60	\$925.00	\$6,290.00	review disability access expert reports - edit barrier lists
Kathryn Stehner	8/12/2021	0.60	\$1,300.00	\$780.00	review revised Stehner declaration in motion for class certification; discussion with B. Umpierre re same
Brian Umpierre	8/12/2021	7.50	\$925.00	\$6,337.50	review disability access expert reports - edit barrier lists; emails with J. Yellin, and experts G. Waters, and J. Mastin re same
Brian Umpierre	8/12/2021	0.10	\$925.00	\$92.50	email to K. Stehner attaching revised draft Stehner declaration supporting motion for class certification for review/comment
Kathryn Stehner	8/13/2021	0.40	\$1,300.00	\$520.00	review Stehner declaration edits; discussion with B. Umpierre re same
Brian Umpierre	8/13/2021	0.80	\$925.00	\$740.00	further edits to Fisher (Schmidt conservator) declaration; email to H. Fisher attaching same and scheduling call to review and discuss
Brian Umpierre	8/13/2021	0.30	\$925.00	\$277.50	email to K. Stehner re Stehner class certification declaration edits
Brian Umpierre	8/13/2021	0.30	\$925.00	\$277.50	email to team re filing excerpts of deposition under seal
Brian Umpierre	8/13/2021	8.80	\$925.00	\$8,140.00	review disability access expert reports - edit barrier lists; emails with J. Yellin and experts G. Waters and J. Mastin re same
Brian Umpierre	8/13/2021	1.60	\$925.00	\$1,480.00	review and edits to draft of class certification brief and supporting G. Wallace declaration
Brian Umpierre	8/13/2021	1.00	\$925.00	\$925.00	team call re class cert filing status and logistics
Brian Umpierre	8/14/2021	0.70	\$925.00	\$647.50	email correspondence and phone call with H. Fisher (Schmidt conservator) re class cert declaration; finalize same
Brian Umpierre	8/14/2021	5.20	\$925.00	\$4,610.00	review Plaintiffs' disability access expert reports - edit barrier lists
Brian Umpierre	8/14/2021	0.30	\$925.00	\$277.50	forward executed Fisher (Schmidt conservator) and Stehner declarations supporting motion for class certification to co-counsel for filing
Brian Umpierre	8/16/2021	1.40	\$925.00	\$1,295.00	proposed reductions to Plaintiffs' experts Cross and Kalis class certification declarations; forward same to A. Xu
Brian Umpierre	8/16/2021	1.30	\$925.00	\$1,387.50	proposed reductions to Plaintiffs' expert Schroyer's class certification declaration; forward same to A. Xu
Brian Umpierre	8/16/2021	1.10	\$925.00	\$1,017.50	proposed reductions to Plaintiffs' expert Flores' class certification declaration; forward same to B. Bien Kahn
Kathryn Stehner	8/17/2021	3.00	\$1,300.00	\$3,900.00	review memorandum in motion for class certification and supporting staffing declarations; discussion with B. Umpierre re same
Brian Umpierre	8/17/2021	1.20	\$925.00	\$1,202.50	proposed reductions to Plaintiff's damages expert Kennedy's declaration in support of class certification; email to A. Xu re same
Kathryn Stehner	8/18/2021	0.70	\$1,300.00	\$910.00	discuss strengths and weaknesses of class certification submission with B. Umpierre
Brian Umpierre	8/18/2021	0.70	\$925.00	\$647.50	discuss strengths and weaknesses of class certification submission with K. Stehner
Brian Umpierre	8/18/2021	0.50	\$925.00	\$462.50	edits to G. Wallace class certification declaration; forward to B. Bien Kahn
Brian Umpierre	8/18/2021	0.30	\$925.00	\$277.50	review letter to defense re production and identification of Plaintiffs' staffing expert materials; email to M. Johnson re same
Brian Umpierre	8/26/2021	0.80	\$925.00	\$832.50	email correspondence with G. Wallace, K. Steyer re obtaining decedent resident files; statutory authority and authorizations for records; forward exemplar requests.
Kathryn Stehner	8/31/2021	0.40	\$1,300.00	\$520.00	review correspondence re plan to obtain class certification declaration resident files in connection with class certification and discovery
Brian Umpierre	8/31/2021	3.80	\$925.00	\$740.00	emails with G. Wallace, M. Johnson re decedent resident files and attaching document requests from similar understanding case re same
Brian Umpierre	8/31/2021	0.40	\$925.00	\$370.00	retrieve and circulate initial preservation of evidence letter to team
Brian Umpierre	9/10/2021	0.80	\$925.00	\$740.00	telephonic discovery meet and confer with M. Johnson re production of decedent resident files and pre-call discussion with M. Johnson re same
Brian Umpierre	9/10/2021	0.50	\$925.00	\$462.50	emails with D. Marks attaching document requests and 30(b)(6) notice re production of expert materials
Brian Umpierre	9/10/2021	0.30	\$925.00	\$277.50	emails with M. Johnson re request for production of MOD files used in staffing analysis software; attaching meet and confer correspondence from similar understanding case re same
Brian Umpierre	9/21/2021	0.70	\$925.00	\$647.50	emails with M. Johnson re request for production of MOD files used in staffing analysis software and potential confidentiality issues
Brian Umpierre	9/21/2021	0.40	\$925.00	\$370.00	phone call with G. Wallace and M. Johnson re Brookdale's request for production of MOD/package files used in staffing analysis software and practice in similar understanding cases
Brian Umpierre	9/21/2021	0.40	\$925.00	\$462.50	review meet and confer letter re deposition edits
Brian Umpierre	9/21/2021	0.40	\$925.00	\$462.50	emails with H. Fisher (Plaintiff Schmidt conservator) re deposition availability and protocol
Kathryn Stehner	9/24/2021	0.30	\$1,300.00	\$390.00	review memo re status of outstanding discovery efforts and class certification preparations
Brian Umpierre	9/24/2021	1.20	\$925.00	\$1,110.00	team call re status, discovery, class certification
Brian Umpierre	9/24/2021	0.30	\$925.00	\$277.50	upload and provide link to team of Brookdale insurance policies produced in Jan 2020
Brian Umpierre	9/27/2021	1.50	\$925.00	\$1,387.50	emails and phone call with A. Xu re class representative depositions, including preparation and outline; gather and forward exemplar materials (outlines, questions, cheat sheet)
Brian Umpierre	9/30/2021	0.40	\$925.00	\$370.00	review M. Johnson and D. Marks correspondence re production of MOD/package files used in staffing analysis software; email response re same to similar scenario in similar understanding litigation
Brian Umpierre	9/30/2021	0.20	\$925.00	\$185.00	email to J. Yellin re Fisher (Schmidt's conservator) deposition availability (dates)
Brian Umpierre	10/10/2021	0.70	\$925.00	\$370.00	forward staffing expert witness declarations submitted in similar understanding litigation in federal court to G. Wallace
Kathryn Stehner	10/4/2021	0.30	\$1,300.00	\$390.00	review draft stipulation on class certification briefing schedule
Brian Umpierre	10/4/2021	0.40	\$925.00	\$370.00	review class cert briefings/scheduling stipulation
Brian Umpierre	10/5/2021	0.20	\$925.00	\$185.00	email correspondence with H. Fisher (Plaintiff Schmidt conservator) re deposition availability in November
Brian Umpierre	10/6/2021	0.40	\$925.00	\$370.00	review joint letter brief re Plaintiffs' motion to compel assessment and service plan data; email to M. Johnson re same
Brian Umpierre	10/7/2021	3.40	\$925.00	\$3,145.00	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - compile relevant documents and review; prepare deposition binder
Kathryn Stehner	10/8/2021	0.50	\$1,300.00	\$650.00	meet with B. Umpierre re plaintiff deposition prep and schedule and status of production of complete resident assessment data for staffing analysis
Brian Umpierre	10/8/2021	0.70	\$925.00	\$422.42	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - handwritten review documents
Brian Umpierre	10/8/2021	0.50	\$925.00	\$462.50	discussion with K. Stehner re Fisher (Schmidt conservator) deposition preparation and schedule and status of production of complete resident assessment data for staffing analysis
Brian Umpierre	10/8/2021	1.00	\$925.00	\$925.00	team call re strategy, update, class certification
Brian Umpierre	10/9/2021	3.80	\$925.00	\$2,775.00	mail good practice deposition questions for class representative deposition preparation and forward to G. Wallace
Brian Umpierre	10/11/2021	6.50	\$925.00	\$6,012.50	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - draft "tough" questions for prep; continue doc review/binder preparation
Brian Umpierre	10/11/2021	0.30	\$925.00	\$277.50	review Admin motion for additional time on opposition to class certification
Brian Umpierre	10/11/2021	6.80	\$925.00	\$6,362.50	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - draft "tough" questions for prep; continue doc review/binder preparation
Brian Umpierre	10/11/2021	0.70	\$925.00	\$416.25	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - draft "tough" questions for prep; continue doc review/binder preparation. Bus and send to H. Fisher
Brian Umpierre	10/11/2021	0.80	\$925.00	\$740.00	review draft opposition to motion to extend time and M. Johnson supporting declaration; email comments to M. Johnson re same
Brian Umpierre	10/16/2021	0.40	\$925.00	\$370.00	review meet and confer correspondence re Plaintiffs' production of MOD/package files used in staffing analysis software
Kathryn Stehner	10/19/2021	0.30	\$1,300.00	\$2,340.00	review draft Fisher (Schmidt conservator) deposition outline
Brian Umpierre	10/19/2021	0.30	\$925.00	\$277.50	phone call with M. Johnson, D. Marks, J. Thornton re production of MOD/package files used in staffing analysis software
Brian Umpierre	10/22/2021	0.20	\$925.00	\$185.00	email with J. Thornton re status of motion to compel MOD/package files used in staffing analysis software
Brian Umpierre	10/27/2021	0.20	\$925.00	\$185.00	review correspondence re Plaintiffs' class representative deposition scheduling
Kathryn Stehner	10/28/2021	3.80	\$1,300.00	\$3,960.00	discuss Plaintiffs' deposition schedules with B. Umpierre
Brian Umpierre	10/28/2021	0.60	\$925.00	\$555.00	conference call with team re Plaintiffs' class representative deposition schedule; email to H. Fisher (Plaintiff Schmidt conservator) re same
Kathryn Stehner	11/1/2021	0.40	\$1,300.00	\$520.00	review discovery order re production of unrecorded package files for class cert staffing analysis; discussion with B. Umpierre re same
Kathryn Stehner	11/1/2021	0.20	\$1,300.00	\$260.00	discuss with B. Umpierre discovery order re production of unrecorded package files and import for class cert staffing analysis
Brian Umpierre	11/1/2021	0.60	\$925.00	\$555.00	telephonic meet and confer re Plaintiffs' motion to compel facility management agreements
Brian Umpierre	11/1/2021	0.40	\$925.00	\$370.00	review discovery order re production of unrecorded package/MOD files; email to K. Stehner re same
Brian Umpierre	11/1/2021	1.00	\$925.00	\$925.00	email to M. Johnson re meet and confer call re facility management agreements; review email memorializing same; comments to M. Johnson and G. Wallace
Brian Umpierre	11/1/2021	0.40	\$925.00	\$370.00	email correspondence with J. Yellin, H. Fisher (Plaintiff Schmidt conservator) re deposition schedules; email to M. Johnson re same
Brian Umpierre	11/4/2021	0.40	\$925.00	\$370.00	review meet and confer correspondence re Plaintiffs' motion to compel facility management agreements; email to M. Johnson re same
Brian Umpierre	11/4/2021	0.60	\$1,300.00	\$780.00	review B. Umpierre email and discuss re Flores subpoena (and respond) seeking class cert related materials
Brian Umpierre	11/6/2021	1.00	\$925.00	\$925.00	telephonic meet and confer re Plaintiffs' motion to compel facility management agreements, etc. with M. Johnson
Brian Umpierre	11/6/2021	0.70	\$925.00	\$647.50	review Marks/Thornton audit re assessment data production and missing information
Brian Umpierre	11/6/2021	1.40	\$925.00	\$1,295.00	legal research re responding to FRCP 45 subpoena - service, objections, quash, bring
Brian Umpierre	11/6/2021	0.80	\$925.00	\$740.00	phone call with H. Johnson, G. Wallace, D. Marks re response to Flores subpoena for documents and materials relied upon; email to K. Stehner re same
Brian Umpierre	11/8/2021	1.20	\$925.00	\$277.50	phone call with K. Stehner re Flores subpoena response
Kathryn Stehner	11/8/2021	0.70	\$1,300.00	\$910.00	review joint statement / MTC resident files and requirements under CA law to provide same to resident upon request
Kathryn Stehner	11/8/2021	0.20	\$1,300.00	\$260.00	discuss discovery joint statement re resident files with B. Umpierre
Brian Umpierre	11/8/2021	0.50	\$925.00	\$462.50	emails with D. Marks, G. Wallace, M. Marks re Flores subpoena response, including public domain materials in similar understanding case that were previously confidential
Brian Umpierre	11/9/2021	1.00	\$925.00	\$4,625.00	draft Plaintiffs' petition of joint letter brief / motion to compel re production of files for class certification declarations
Brian Umpierre	11/9/2021	0.40	\$925.00	\$370.00	email to M. Johnson re legal claim for failure to provide resident records pursuant to CA regulation
Kathryn Stehner	11/9/2021	2.50	\$1,300.00	\$3,250.00	review Protective Order in similar understanding litigation re use certain information in Brookdale litigation
Kathryn Stehner	11/9/2021	0.50	\$1,300.00	\$650.00	discussion with B. Umpierre re Protective Orders and use of information from/in similar understanding litigation
Brian Umpierre	11/9/2021	0.50	\$925.00	\$555.00	review file for record of counsel designating Flores' deposition transcript in similar federal court understanding case confidential pursuant to protective order - re Flores subpoena response
Brian Umpierre	11/9/2021	0.70	\$925.00	\$647.50	draft email to S. Kang (counsel for Agilis) re production of Agilis document in Brookdale litigation
Brian Umpierre	11/9/2021	0.50	\$925.00	\$462.50	review M. Johnson edits to Plaintiffs' portion of discovery letter brief re production of resident declaration files; email to M. Johnson re same
Brian Umpierre	11/9/2021	0.30	\$925.00	\$832.50	emails with M. Johnson, G. Wallace, D. Marks re impact of protective orders in Agilis litigation on Brookdale discovery
Brian Umpierre	11/9/2021	0.50	\$925.00	\$462.50	discussion with K. Stehner re Agilis Protective Order
Brian Umpierre	11/12/2021	0.40	\$925.00	\$370.00	review protective order entered in Sunrise litigation re disclosure of confidential materials subpoenaed in other litigation; email to J. Thornton, D. Marks re producing Schroyer's Sunrise declarations in Brookdale litigation
Brian Umpierre	11/12/2021	1.00	\$925.00	\$925.00	review Brookdale's portion of joint letter brief re Plaintiffs' motion to compel decedent resident files; edits to Plaintiffs' section based thereon and forward to M. Johnson, G. Wallace for review and comment
Kathryn Stehner	11/16/2021	0.50	\$1,300.00	\$650.00	to-fo/Meeting with D. Marks, J. Thornton, M. Johnson re staffing experts' compliance with protective orders in similar understanding litigation and Plaintiffs/Flores App 17
Brian Umpierre	11/16/2021	0.50	\$925.00	\$462.50	review Brookdale's portion of joint letter brief; emails with G. Wallace, M. Johnson re same; email to M. Jacobson requesting Defendants edit their portion to 2.5 allowed pages
Brian Umpierre	11/16/2021	0.30	\$925.00	\$277.50	emails with M. Johnson re joint letter brief on decedent resident files; finalize and send for filing
Brian Umpierre	11/16/2021	0.30	\$925.00	\$277.50	review draft joint letter brief / motion to compel on transportation policies; email to M. Johnson re same
Brian Umpierre	11/17/2021	1.00	\$925.00	\$925.00	team call re discovery, strategy, assignments, status
Kathryn Stehner	11/18/2021	0.40	\$1,300.00	\$520.00	review memo re status of outstanding discovery
Brian Umpierre	11/22/2021	0.20	\$925.00	\$185.00	review email from G. Grunfeld attaching naming letter to H. Fisher (Plaintiff Schmidt conservator)
Brian Umpierre	11/22/2021	0.40	\$925.00	\$370.00	emails with D. Marks re anticipated deposition testimony of staffing expert; discuss availability / whether "confidential" pursuant to protective orders in Agilis or Sunrise litigations
Brian Umpierre	11/23/2021	0.50	\$925.00	\$462.50	telephonic meet and confer re production of updated resident files; email summary to M. Johnson re same
Brian Umpierre	12/1/2021	1.00	\$925.00	\$925.00	Plaintiffs' staffing expert Flores depo prep - review Agilis depo transcript re 2 person assist and double time; email to J. Thornton re same
Brian Umpierre	12/1/2021	1.20	\$925.00	\$1,110.00	team call re discovery, strategy
Brian Umpierre	12/1/2021	0.80	\$925.00	\$740.00	legal research re statutory definition of RCFE and "facilities" falling within same
Brian Umpierre	12/1/2021	0.40	\$925.00	\$370.00	email to G. Wallace, M. Johnson re statutory authority requiring documentation of in-service training at RCFEs
Brian Umpierre	12/2/2021	1.30	\$925.00	\$1,202.50	phone call with M. Johnson re staffing experts' compliance with protective orders in similar understanding litigation when offering testimony in Brookdale litigation
Brian Umpierre	12/2/2021	0.40	\$925.00	\$2,230.00	emails with D. Marks re staffing experts' compliance with protective orders in similar understanding litigation when offering testimony in Brookdale litigation ; emails with D. Marks re same
Brian Umpierre	12/2/2021	2.00	\$925		

Brian Umpleire	12/23/2021	0.60	\$925.00	\$955.00	draft email summary of 12/21 meet and confer and forward to M. Johnson for review and comment
Brian Umpleire	1/3/2022	0.10	\$925.00	\$92.50	email to H. Fisher (Plaintiff Schmidt conservator) re availability for deposition preparation session
Brian Umpleire	1/3/2022	0.10	\$925.00	\$92.50	email to G. Wallace re Fisher deposition preparation and task list
Brian Umpleire	1/4/2022	0.20	\$925.00	\$185.00	emails with H. Fisher (Plaintiff Schmidt conservator) scheduling deposition preparation session
Brian Umpleire	1/4/2022	0.30	\$925.00	\$277.50	phone call with G. Wallace re Fisher deposition preparation and outstanding tasks
Kathryn Stebner	1/6/2022	2.10	\$1,300.00	\$2,730.00	review revised deposition defense preparation outline re Fisher (Schmidt conservator) deposition preparation (re Plaintiff Ralph Schmidt)
Brian Umpleire	1/10/2022	4.20	\$925.00	\$3,485.00	H. Fisher (Schmidt conservator) / class rep deposition preparation session via Zoom
Brian Umpleire	1/10/2022	0.40	\$925.00	\$370.00	review new Schmidt-related emails and correspondence from conservator Fisher - class representative deposition preparation
Kathryn Stebner	1/11/2022	0.40	\$1,300.00	\$920.00	discuss preliminary Fisher deposition preparation session with B. Umpleire
Brian Umpleire	1/12/2022	0.20	\$925.00	\$277.50	discuss preliminary Fisher (Schmidt conservator) deposition preparation session with K. Stebner
Brian Umpleire	1/13/2022	2.00	\$925.00	\$1,850.00	review new documents from H. Fisher and prepare for production; email to M. Johnson, G. Wallace re same
Brian Umpleire	1/13/2022	0.40	\$925.00	\$370.00	phone call with M. Johnson re new Fisher documents to be produced and status of deposition preparation
Brian Umpleire	1/13/2022	3.00	\$925.00	\$2,775.00	prepare Fisher/Schmidt documents for redaction/production; legal research re conservator and privilege (if any)
Brian Umpleire	1/14/2022	2.40	\$925.00	\$2,400.00	prepare new Fisher/Schmidt documents for production, including redactions; phone calls/emails with H. Fisher, M. Johnson re same; forward package to R. Bonner for upload and production
Kathryn Stebner	1/17/2022	0.40	\$1,300.00	\$925.00	edit Fisher (Schmidt conservator) deposition defense outline
Brian Umpleire	1/17/2022	5.80	\$925.00	\$5,365.00	draft deposition preparation outline of key points to cover with Schmidt representative H. Fisher; revised version for witnesses of 'key points' to remember
Brian Umpleire	1/17/2022	0.30	\$925.00	\$277.50	emails with G. Wallace re Fisher deposition preparation
Brian Umpleire	1/18/2022	2.50	\$925.00	\$2,312.50	review emails/notes and revise draft outline for today's depo prep session with H. Fisher
Brian Umpleire	1/18/2022	4.00	\$925.00	\$3,700.00	H. Fisher (Schmidt conservator / class rep) deposition preparation session via Zoom
Kathryn Stebner	1/18/2022	0.60	\$1,300.00	\$780.00	discussion with B. Umpleire re Fisher deposition defense
Brian Umpleire	1/18/2022	5.00	\$925.00	\$4,625.00	H. Fisher deposition preparation - review other class rep depo transcripts for line of attack; emails with H. Fisher; phone call with M. Johnson re strategy; email with defense re Zoom link for deposition
Brian Umpleire	1/18/2022	0.80	\$925.00	\$740.00	prepare for H. Fisher (Schmidt conservator / class rep) deposition - review notes/outline and discussion with K. Stebner
Brian Umpleire	1/20/2022	9.00	\$925.00	\$8,325.00	H. Fisher (Schmidt conservator / class rep) deposition via Zoom
Kathryn Stebner	1/21/2022	0.50	\$1,300.00	\$650.00	meet with B. Umpleire re Fisher deposition
Brian Umpleire	1/21/2022	0.50	\$925.00	\$462.50	meet with K. Stebner re Fisher deposition outcome and highlights
Brian Umpleire	1/21/2022	0.60	\$925.00	\$555.00	review Protective Order re designating testimony confidential; email to M. Jacobson re same
Brian Umpleire	1/21/2022	1.00	\$925.00	\$925.00	team call re strategy, discovery, class certification projects
Brian Umpleire	1/24/2022	0.20	\$925.00	\$277.50	email correspondence with defense re request for situation on Daubert briefing page limitations; email to G. Wallace, M. Johnson re same
Brian Umpleire	1/26/2022	0.20	\$925.00	\$185.00	review draft discovery letter brief and forward edits re same to M. Johnson, G. Wallace
Brian Umpleire	1/26/2022	0.40	\$925.00	\$370.00	email to R. Steyer re class member letter template
Brian Umpleire	1/26/2022	1.50	\$925.00	\$1,387.50	review and re-review H. Fisher (Schmidt conservator) deposition transcript, circulate to team; notes/summary to file
Brian Umpleire	2/1/2022	0.40	\$925.00	\$370.00	review defense email re tests during Fisher deposition; email to G. Wallace, M. Johnson re same; review deposition transcript re same
Brian Umpleire	2/3/2022	0.50	\$925.00	\$462.50	observe discovery motion to compel hearing re training and budget compliance materials
Brian Umpleire	2/7/2022	0.50	\$925.00	\$462.50	review draft of Plaintiff Schmidt supplemental responses to Req Set 2, email to M. Johnson re same
Brian Umpleire	2/8/2022	0.00	\$925.00	\$0.00	team conference call re discovery status, class certification, Daubert oppositions
Brian Umpleire	2/4/2022	0.40	\$925.00	\$370.00	complete class certification pleadings (redacted) in similar understaffing class case and circulate to team
Brian Umpleire	2/4/2022	2.50	\$925.00	\$2,312.50	review Defendants' Daubert motions against Plaintiff's experts Flores and Schroyer and notes re same
Kathryn Stebner	2/7/2022	0.70	\$1,300.00	\$910.00	discuss strengths and weaknesses re Schroyer/Flores Daubert motions / motions to exclude
Brian Umpleire	2/7/2022	0.60	\$925.00	\$555.00	email to H. Fisher (Schmidt conservator) attaching deposition transcript and explaining process for identifying errata
Brian Umpleire	2/7/2022	7.70	\$925.00	\$7,122.50	draft oppositions to Flores/Schroyer Daubert motions - review Flores, Schroyer declarations in support of class certification, pencil outline of oppositions; discussion with K. Stebner re same
Brian Umpleire	2/7/2022	0.60	\$925.00	\$555.00	discuss strengths and weaknesses re Schroyer/Flores Daubert motions / motions to exclude with K. Stebner
Brian Umpleire	2/8/2022	7.30	\$925.00	\$6,752.50	draft opposition to Flores/Schroyer Daubert motions - review Flores deposition transcript; further edits to draft outline of oppositions
Brian Umpleire	2/9/2022	1.00	\$925.00	\$925.00	conference call among G. Wallace, M. Johnson, D. Marks, J. Thornton re Flores/Schroyer Daubert oppositions
Brian Umpleire	2/9/2022	6.70	\$925.00	\$6,197.50	draft oppositions to Flores/Schroyer Daubert motions - review Schroyer deposition transcript, further edits to draft outline of oppositions
Kathryn Stebner	2/9/2022	0.40	\$1,300.00	\$520.00	discussion with B. Umpleire re Schroyer/Flores Daubert motions and briefing schedule
Brian Umpleire	2/10/2022	0.60	\$925.00	\$535.00	draft Flores/Schroyer Daubert oppositions - legal research, draft
Brian Umpleire	2/10/2022	0.40	\$925.00	\$370.00	discussion with K. Stebner re Flores/Schroyer Daubert / motions to exclude oppositions and briefing schedule
Brian Umpleire	2/11/2022	0.70	\$1,300.00	\$910.00	review B. Umpleire email re motion to enlarge time on Daubert oppositions and draft language for Stebner firm's professional commitments during Feb-Mar; discussion with B. Umpleire re same.
Brian Umpleire	2/11/2022	0.40	\$925.00	\$370.00	email to K. Stebner re motion to enlarge time on Daubert oppositions; draft language for Stebner firm's professional commitments during Feb-Mar
Brian Umpleire	2/11/2022	9.50	\$925.00	\$8,787.50	draft Flores Daubert opposition
Brian Umpleire	2/12/2022	2.50	\$925.00	\$2,312.50	draft Flores Daubert opposition; forward same to G. Wallace for review and comment
Brian Umpleire	2/14/2022	6.50	\$925.00	\$7,562.50	draft Schroyer Daubert opposition - legal research, draft
Brian Umpleire	2/14/2022	6.50	\$925.00	\$7,562.50	forward absent class member voice mail contact to Schneider Wallace outreach team for follow up
Brian Umpleire	2/15/2022	6.50	\$925.00	\$6,012.50	draft Schroyer Daubert opposition - legal research, draft
Brian Umpleire	2/16/2022	3.40	\$925.00	\$3,145.00	review Fisher (Schmidt conservator) deposition transcript and compile list of errata; forward same to J. Fisher for review/confirmation
Brian Umpleire	2/16/2022	4.20	\$925.00	\$3,485.00	legal research re computer game servers in light of Daubert standard
Kathryn Stebner	2/17/2022	1.80	\$1,300.00	\$2,340.00	review draft Flores/Schroyer Daubert opposition
Brian Umpleire	2/17/2022	0.40	\$925.00	\$370.00	emails with H. Fisher (Schmidt conservator) re deposition errata edits
Brian Umpleire	2/17/2022	2.00	\$925.00	\$1,850.00	draft Flores Daubert opposition - further edits
Kathryn Stebner	2/18/2022	6.40	\$1,300.00	\$7,860.00	discussion with B. Umpleire re 'control' by Brookdale and case theory vs evidence; scheduling conf call with RHGG re same.
Brian Umpleire	2/18/2022	0.40	\$925.00	\$370.00	review DSS subpoena to centralized applications bureau in Sacramento re complaint investigation and facility reports; email to M. Johnson re same
Brian Umpleire	2/18/2022	2.50	\$925.00	\$2,312.50	legal research for Daubert oppositions - legal standard
Brian Umpleire	2/18/2022	0.70	\$925.00	\$632.50	review corporate control memo authored by co-counsel; email to K. Stebner re conference call re same
Brian Umpleire	2/18/2022	0.70	\$925.00	\$647.50	team call re status of shortfall staffing analysis, discovery motions, and offensively/defensively Daubert motions
Kathryn Stebner	2/18/2022	0.40	\$1,300.00	\$520.00	meet with B. Umpleire re status of shortfall analysis, discovery motions, Dauberts
Brian Umpleire	2/19/2022	0.40	\$925.00	\$370.00	meeting with K. Stebner re shortfall staffing analysis update and Daubert motions status
Kathryn Stebner	2/19/2022	1.00	\$1,300.00	\$1,300.00	conference call with B. Umpleire, RHGG (AS, CCS) re corporate liability; discussion with B. Umpleire re same.
Brian Umpleire	2/22/2022	2.00	\$925.00	\$1,850.00	review case files in similar understaffing cases against large chains for relevant 'alter ego' liability information in preparation for conference call with co-counsel firm re import of same issue for Brookdale
Brian Umpleire	2/22/2022	0.50	\$925.00	\$462.50	conference call with K. Stebner, A. Xu, G. Grundre re corporate liability
Brian Umpleire	2/22/2022	0.60	\$925.00	\$555.00	Flores Daubert opposition - further edits and additional legal research
Kathryn Stebner	2/22/2022	0.50	\$1,300.00	\$520.00	discussion with B. Umpleire re owner/operator issue and Bowman 30(b)(6) testimony re same and update on expert/Daubert motions.
Brian Umpleire	2/23/2022	0.50	\$925.00	\$462.50	conversation with K. Stebner re owner/operator status and Bowman 30(b)(6) testimony re same (owner/operator issue) and update on expert / Daubert motions.
Brian Umpleire	2/23/2022	6.70	\$925.00	\$6,197.50	Flores/Schroyer Daubert oppositions - distinguish Defendants' cases
Brian Umpleire	2/24/2022	6.70	\$925.00	\$6,197.50	review meet and confer letter requesting production of Brookdale's staffing benchmarks
Brian Umpleire	2/24/2022	0.30	\$925.00	\$277.50	email to H. Fisher (Schmidt conservator) with attachments re depo errata
Brian Umpleire	2/24/2022	1.30	\$925.00	\$1,202.50	finalize draft of Flores Daubert opposition; forward same to G. Wallace for review, comment
Brian Umpleire	2/24/2022	4.10	\$925.00	\$3,792.50	Schroyer Daubert opposition - further edits, drafting
Brian Umpleire	2/24/2022	0.20	\$925.00	\$185.00	forward absent class member contact to Schneider Wallace outreach team for follow up
Brian Umpleire	2/25/2022	5.20	\$925.00	\$4,810.00	Schroyer Daubert opposition - further edits, drafting, legal research
Brian Umpleire	2/26/2022	0.20	\$925.00	\$185.00	emails with H. Fisher (Schmidt conservator) re deposition errata
Brian Umpleire	2/26/2022	6.50	\$925.00	\$6,012.50	email to defense re executed Fisher edits and identifying confidential testimony
Brian Umpleire	2/26/2022	6.50	\$925.00	\$6,012.50	Schroyer Daubert opposition - further edits, drafting, legal research
Kathryn Stebner	3/1/2022	0.50	\$1,300.00	\$650.00	discussion with B. Umpleire re Schroyer Daubert opposition.
Brian Umpleire	3/1/2022	6.60	\$925.00	\$6,105.00	Schroyer Daubert opposition - further edits, drafting, legal research; update K. Stebner re same
Brian Umpleire	3/1/2022	1.00	\$925.00	\$1,387.50	Flores Daubert opposition - review G. Wallace redline and incorporate edits
Brian Umpleire	3/2/2022	5.80	\$925.00	\$5,365.00	Schroyer Daubert opposition - further edits, drafting, legal research
Kathryn Stebner	3/3/2022	0.80	\$1,300.00	\$1,040.00	review draft Schroyer Daubert opposition
Brian Umpleire	3/3/2022	6.00	\$925.00	\$5,550.00	Schroyer Daubert opposition - draft and forward same to G. Wallace for review, comment
Brian Umpleire	3/4/2022	4.40	\$1,300.00	\$5,720.00	review Defendants' opposition to class certification and supporting papers / experts
Brian Umpleire	3/4/2022	7.30	\$925.00	\$6,752.50	email re Defendants' Opposition to Class Certification and supporting papers, including declarations of Saad and Jacobson re understaffing
Brian Umpleire	3/4/2022	0.30	\$925.00	\$277.50	email to defense re Exhibit A to Jacobson Declaration; emails with J. Thornton, M. Johnson re same
Brian Umpleire	3/4/2022	1.00	\$925.00	\$1,387.50	team call re class certification oppositions/ filing, strategy, assignments
Kathryn Stebner	3/6/2022	1.20	\$1,300.00	\$1,560.00	meet with B. Umpleire and analyze Defendants' class certification opposition
Brian Umpleire	3/6/2022	1.20	\$925.00	\$1,110.00	meet with K. Stebner and analyze Defendants' class certification opposition
Brian Umpleire	3/7/2022	0.80	\$925.00	\$740.00	email with D. Marks re contact labor document; as regards Flores/Schroyer Daubert oppositions
Brian Umpleire	3/7/2022	0.70	\$925.00	\$647.50	review Jacobson Declaration Ex A (CV); emails with J. Thornton re same
Brian Umpleire	3/7/2022	7.80	\$925.00	\$7,215.00	further edits to Flores Daubert opposition in consideration of Defendants' Class Cert Opposition and Saad/Jacobson supporting declarations
Brian Umpleire	3/8/2022	1.50	\$925.00	\$1,387.50	Flores/Schroyer Daubert oppositions - review Jacobson website and information contained therein; email to J. Thornton re same
Brian Umpleire	3/8/2022	0.70	\$925.00	\$647.50	phone call with K. Stebner, J. Thornton re Flores and Schroyer Daubert oppositions and class certification opposition (generally); forward draft oppositions
Brian Umpleire	3/8/2022	0.20	\$925.00	\$185.00	emails with team re defense expert Saad Declaration Ex A (CV) and attaching same
Brian Umpleire	3/8/2022	4.00	\$925.00	\$3,700.00	Review defense expert Saad Declaration in support of opposition to class certification and notes to file
Brian Umpleire	3/8/2022	1.50	\$925.00	\$1,387.50	further edits to Flores and Schroyer Daubert oppositions in consideration of Class Cert Opposition and Saad/Jacobson declarations in support thereof
Brian Umpleire	3/8/2022	1.50	\$925.00	\$1,387.50	email correspondence with J. Thornton re meaning of job code 099 and salaried employees; review correspondence re same - regarding Flores/Schroyer Daubert oppositions
Brian Umpleire	3/8/2022	0.80	\$925.00	\$740.00	email correspondence with J. Thornton re request of Defendants for 'room number' information for use in staffing analysis; review correspondence re same re Flores/Schroyer Daubert oppositions
Brian Umpleire	3/8/2022	0.40	\$925.00	\$370.00	phone call with J. Thornton re job code/room number info for staffing analysis - re Flores/Schroyer Daubert oppositions
Brian Umpleire	3/8/2022	0.50	\$925.00	\$462.50	targeted Relativity database searches re computer simulations and local employee re Flores/Schroyer Daubert oppositions
Brian Umpleire	3/8/2022	4.00	\$925.00	\$3,700.00	research re peer reviewed literature on transfer trauma - re reply in support of motion for class certification
Brian Umpleire	3/8/2022	1.00	\$925.00	\$925.00	team call re class certification reply - strategy / assignments
Brian Umpleire	3/8/2022	1.00	\$925.00	\$925.00	review Daubert cases addressing use of computer simulations forwarded by D. Marks re Schroyer Daubert opposition
Brian Umpleire	3/8/2022	4.00	\$925.00	\$3,700.00	review Daubert cases addressing use of computer simulations forwarded by D. Marks re Schroyer Daubert opposition
Brian Umpleire	3/10/2022	0.70	\$925.00	\$647.50	review discovery letter brief requesting Brookdale's production of benchmark staffing formula; compare draft Flores Daubert opposition and conform
Brian Umpleire	3/10/2022	2.00	\$925.00	\$1,850.00	search/review transfer trauma peer reviewed literature in connection with reply in support of motion for class certification
Kathryn Stebner	3/12/2022	0.70	\$1,300.00	\$910.00	discussion with B. Umpleire re transfer trauma - re class cert reply
Brian Umpleire	3/11/2022	4.00	\$925.00	\$3,700.00	review transfer trauma / relocation stress syndrome journal articles, discussion with K. Stebner re same in support of class certification reply
Brian Umpleire	3/11/2022	0.50	\$925.00	\$462.50	review D. Marks email and attachments re production of SAS software in other litigation
Brian Umpleire	3/11/2022	0.30	\$925.00	\$277.50	emails with team re propounding newest set of document requests on Brookdale
Brian Umpleire	3/11/2022	1.40	\$925.00	\$1,295.00	conference call with G. Wallace, M. Johnson, D. Marks, J. Thornton re Schroyer, Flores Daubert oppositions
Brian Umpleire	3/14/2022	1.00	\$925.00	\$925.00	review transfer trauma journal articles; draft memo excerpting citable portions; forward same to G. Wallace for inclusion in class certification reply
Brian Umpleire	3/14/2022	0.30	\$925.00	\$277.50	phone call with D. Marks re Schroyer, Flores Daubert oppositions and production of materials in discovery
Brian Umpleire	3/14/2022	3.40	\$925.00	\$3,145.00	pull 2020-2021 joint discovery statements and review, draft court / declaration re discovery, missing data, follow up re non-manipulation, for inclusion in class certification reply materials
Brian Umpleire	3/14/2022	3.80	\$925.00	\$3,515.00	review defense expert Saad Declaration re class certification reply and Daubert oppositions
Brian Umpleire	3/15/2022	0.30	\$925.00	\$9,527.50	Schroyer Daubert opposition - incorporate D. Marks edits and further revisions
Brian Umpleire	3/15/2022	0.30	\$925.00	\$277.50	phone call with G. Wallace re Flores, Schroyer Daubert oppositions and filing
Brian Umpleire	3/15/2022	0.20	\$925.00	\$185.00	forward operative Flores Daubert opposition to G. Wallace with explanation of recent changes
Kathryn Stebner	3/16/2022	1.80	\$1,300.00	\$2,340.00	review final drafts of Flores and Schroyer Daubert oppositions
Brian Umpleire	3/16/2022	0.30	\$1,300.00	\$390.00	meet with B. Umpleire re final drafts of staffing expert Daubert oppositions
Brian Umpleire	3/16/2022	9.50	\$925.00	\$8,787.50	Schroyer Daubert opposition - incorporate D/Marks edits and further revisions; emails and phone calls with D. Marks, J. Thornton re same
Brian Umpleire	3/16/2022	12.30	\$925.00	\$11,377.50	draft B. Umpleire declarations supporting Flores / Schroyer Daubert oppositions and compile exhibits and cover pages; phone calls with D. Marks and G. Wallace re same; review Schroyer declaration and insert cites
Brian Umpleire	3/18/2022	8.80	\$925.00	\$8,140.00	finalize and prepare Schroyer/Flores Daubert oppositions for filing including redactions; edits to briefs and B. Umpleire declarations; review/edit Flores Declaration; finalize briefs/declarations, cites; phone calls with J. Yelin, G. Wallace, D. Marks, J. Thornton
Brian Umpleire	3/21/2022	0.40	\$925.00	\$370.00	GoToMeeting with J. Thornton, G. Wallace, M. Johnson re Saad production and deposition preparation
Brian Umpleire	3/21/2022	0.70	\$925.00	\$647.50	email to defense re average length of stay at Brookdale; searches re liability and local employee re Flores/Schroyer Daubert oppositions
Brian Umpleire	3/22/2022	1.00	\$925.00	\$925.00	review A. Xu email re letter brief on Set 8 PDFs; review notes re management agreement and 'national' costs associated with BSL, Inc. re forward same to A. Xu
Brian Umpleire	3/23/2022	0.60	\$925.00	\$555.00	team call re class certification reply status/assignments and strategy
Brian Umpleire	3/23/2022	4.00	\$925.00	\$3,700.00	targeted Relativity database searches re management agreement(s) language re shared/corporate costs re control issue
Kathryn Stebner	3/24/2022	1.30	\$1,300.00	\$1,560.00	meet with B. Umpleire re class certification reply strategy and class certification ownership aspects
Brian Umpleire	3/24/2022	5.50	\$925.00	\$5,087.50	review management agreements re aspects of BSL, Inc. 'control' re class certification reply
Brian Umpleire	3/24/2022	0.70	\$925.00	\$647.50	observe discovery hearing re Defendants' production of staffing software/benchmark data
Brian Umpleire	3/24/2022	0.50	\$925.00	\$462.50	email correspondence with J. Thornton re summary of deposition and local employee re Flores/Schroyer Daubert oppositions
Brian Umpleire	3/25/2022	5.30	\$925.00	\$4,902.50	draft memo re management agreement language evidencing BSL, Inc. control, re class certification reply
Brian Umpleire	3/28/2022	0.50	\$925.00	\$462.50	review draft letter brief re additional depositions over 10-days limit
Brian Umpleire	3/28/2022	0.50	\$925.00	\$462.50	email to A. Xu re management agreement(s) / categories for class cert reply
Brian Umpleire					

Brian Umpleire	4/15/2022	0.30	\$925.00	\$277.50	email correspondence with A. Xu re 30(b)(6) deposition ownership exhibit and correspondence re same for G. Wallace class certification reply declaration
Brian Umpleire	4/15/2022	1.00	\$925.00	\$925.00	email correspondence and phone call with R. Steyer re unhapply camper declaration edits
Brian Umpleire	4/15/2022	2.30	\$925.00	\$2,127.50	reviewed unhapply camper declarations
Brian Umpleire	4/15/2022	0.50	\$925.00	\$462.50	review defense experts Jacobson, Anderson debug summary notes
Brian Umpleire	4/15/2022	2.00	\$925.00	\$1,850.00	further edits to Flores/Schroyer reply declaration outlines/bullets following defense expert Jacobson deposition testimony
Brian Umpleire	4/15/2022	1.00	\$925.00	\$925.00	phone call with J. Thornton re expert/Daubert argument strategy
Brian Umpleire	4/15/2022	3.20	\$925.00	\$3,237.50	legal research for Daubert motions to exclude - offensive (Jacobson/Saad) and defensive (Flores/Schroyer) - legal standards
Brian Umpleire	4/15/2022	0.80	\$925.00	\$740.00	draft Team re class certification declarations/responses with POAs
Brian Umpleire	4/15/2022	3.20	\$925.00	\$2,960.00	email to R. Steyer Re Reply Declaration in support of motion for class certification
Brian Umpleire	4/15/2022	4.00	\$925.00	\$3,760.00	review requests in support of Defendants' motions to exclude - strike Flores, Schroyer opinions; further edits to outlines/bullets for Flores/Schroyer class certification reply declarations
Brian Umpleire	4/15/2022	1.70	\$925.00	\$1,572.50	draft Schroyer Reply Declaration in support of motion for class certification
Brian Umpleire	4/15/2022	0.40	\$925.00	\$370.00	review Brookdale's 2nd set of document requests to Plaintiffs
Brian Umpleire	4/15/2022	1.00	\$925.00	\$925.00	review new Brookdale document production re ownership/control
Brian Umpleire	4/20/2022	5.20	\$925.00	\$4,810.00	reviewed unhapply camper declarations
Brian Umpleire	4/20/2022	1.00	\$925.00	\$925.00	phone call with J. Thornton re Schroyer/Flores Reply declarations in support of motion for class certification
Brian Umpleire	4/20/2022	0.80	\$925.00	\$740.00	team call - class certification reply and supporting materials - status of assignments
Brian Umpleire	4/20/2022	7.40	\$925.00	\$6,870.00	offensive Daubert motions to exclude against defense experts Saad and Jacobson - review respective declarations and outline/legal research re same re abandoned and/or unreliable opinions
Brian Umpleire	4/20/2022	7.20	\$925.00	\$6,660.00	legal research for Daubert motions to exclude - offensive (Jacobson/Saad) and defensive (Flores/Schroyer) - legal standards
Brian Umpleire	4/20/2022	0.70	\$1,300.00	\$910.00	phone call with G. Wallace, M. Johnson, J. Thornton, D. Marks re motions to exclude defense experts Saad and Jacobson
Kathryn Stehner	4/26/2022	0.70	\$1,300.00	\$910.00	discussion with B. Umpleire re offensive Daubert motions directed at Brookdale experts Saad and Saad.
Brian Umpleire	4/26/2022	0.30	\$925.00	\$277.50	draft motion to exclude defense experts Saad and Jacobson - review Saad deposition transcript and draft outline
Brian Umpleire	4/26/2022	2.00	\$925.00	\$1,850.00	reviewed unhapply camper declarations
Brian Umpleire	4/27/2022	0.40	\$925.00	\$362.50	targeted Relativity searches re LDR data produced by Brookdale; LDR data for Valerio Hills and dates of Brookdale ownership; compile same; review and excerpt Saad depo testimony re same; emails and phone calls with J. Thornton re same
Brian Umpleire	4/27/2022	0.50	\$925.00	\$462.50	review M. Johnson memo on evidentiary issues associated with class motion and reply
Brian Umpleire	4/27/2022	0.50	\$925.00	\$462.50	phone call with D. Marks re Belson declaration in support of class certification reply
Brian Umpleire	4/27/2022	0.50	\$925.00	\$462.50	phone call with R. Steyer re unhapply camper declarations
Brian Umpleire	4/27/2022	2.50	\$925.00	\$2,312.50	draft motion to exclude defense expert Saad
Brian Umpleire	4/27/2022	6.40	\$925.00	\$5,940.00	unhappy camper declaration edits
Brian Umpleire	4/28/2022	2.50	\$925.00	\$2,312.50	D. Marks project re finding bases for expert reply declarations in opposition to class certification (not in response to Dauberts); email to D. Marks re same
Brian Umpleire	4/28/2022	1.00	\$925.00	\$925.00	reviewed unhapply camper declarations; forward same to R. Steyer
Brian Umpleire	4/28/2022	0.30	\$925.00	\$277.50	review G. Wallace outline of draft reply in support of class certification
Brian Umpleire	4/28/2022	8.20	\$925.00	\$7,622.50	pull from Relativity additional LDR reports for J. Thornton analysis and forward same
Brian Umpleire	4/28/2022	1.80	\$925.00	\$1,665.00	review Citrus Heights LDR re census vs occupancy; email to J. Thornton re same
Brian Umpleire	4/28/2022	0.30	\$925.00	\$277.50	email to D. Marks, J. Thornton, G. Wallace re LDR reports and notes/variance explanations
Brian Umpleire	4/28/2022	0.40	\$925.00	\$370.00	emails to G. Wallace, M. Johnson re motions to exclude - Dauberts and inclusion of LDRs as evidence of compliance with benchmarks
Brian Umpleire	4/28/2022	0.20	\$925.00	\$185.00	review meet and confer correspondence to defense re production of task times and labor benchmarks, meeting and confering re same, unreasonable delay
Brian Umpleire	4/30/2022	2.00	\$925.00	\$1,850.00	review LDRs re budget variance reporting requirements
Brian Umpleire	4/30/2022	2.00	\$925.00	\$1,850.00	reviewed unhapply camper declarations
Kathryn Stehner	5/02/2022	1.00	\$1,300.00	\$1,300.00	review B. Umpleire outline of Jacobson/Saad Daubert motions and evidentiary bases for striking opinions
Kathryn Stehner	5/02/2022	0.30	\$1,300.00	\$390.00	discuss draft outline of Daubert/motions to strike Defendants' experts with B. Umpleire
Brian Umpleire	5/02/2022	5.00	\$925.00	\$4,625.00	outline of Jacobson/Saad Daubert / motion to exclude and evidentiary bases for striking opinions; phone call with J. Thornton re same
Brian Umpleire	5/02/2022	2.50	\$925.00	\$2,312.50	targeted Relativity database searches re budget variance reporting requirements
Brian Umpleire	5/02/2022	1.80	\$925.00	\$1,665.00	pull from Relativity database all Citrus Heights and Valerio Hills LDRs and upload for forwarding to J. Thornton
Brian Umpleire	5/02/2022	0.30	\$925.00	\$277.50	discuss draft outline of Daubert/motions to strike defense experts Saad and Jacobson with K. Stehner
Brian Umpleire	5/02/2022	0.20	\$925.00	\$185.00	review draft letter to counsel re deposition wrongdoing allegations
Brian Umpleire	5/02/2022	2.30	\$925.00	\$2,127.50	pull from Relativity database LDRs and upload for forwarding to J. Thornton (Rancie Minge, Vacaville)
Brian Umpleire	5/02/2022	2.50	\$925.00	\$2,312.50	targeted Relativity database searches re budget oversight / (benchmark) variance reporting
Brian Umpleire	5/02/2022	2.80	\$925.00	\$2,590.00	reviewed unhapply camper declarations; forward same to R. Steyer
Brian Umpleire	5/02/2022	1.50	\$925.00	\$1,367.50	team call re class certification reply - status of assignments and updates; further strategy
Kathryn Stehner	5/04/2022	1.50	\$1,300.00	\$1,300.00	discussion with B. Umpleire following co-counsel meeting re status of class certification reply and expert motions/declarations related thereto
Brian Umpleire	5/04/2022	0.70	\$925.00	\$647.50	reviewed unhapply camper declarations; emails to R. Steyer re same
Brian Umpleire	5/04/2022	1.20	\$925.00	\$1,110.00	pull from Relativity database LDRs and upload for forwarding to J. Thornton (Vacaville, Yorba Linda)
Brian Umpleire	5/04/2022	0.30	\$925.00	\$277.50	benchmark variance report project (reviewing LDRs for budget compliance/variance); including review operative draft of Reply G. Wallace declaration in support of class certification
Brian Umpleire	5/04/2022	0.50	\$925.00	\$462.50	phone call with R. Steyer re unhapply camper declarations
Brian Umpleire	5/04/2022	1.00	\$925.00	\$925.00	update call with D. Marks, J. Thornton, M. Johnson, G. Wallace re staffing expert reply declarations (Flores, Schroyer) and offensive Daubert / motions to exclude defense experts Saad and Jacobson
Brian Umpleire	5/04/2022	0.40	\$925.00	\$370.00	phone call with K. Stehner following co-counsel call re status of class certification reply and expert motions/declarations related thereto
Brian Umpleire	5/04/2022	0.30	\$925.00	\$277.50	benchmark variance report project (reviewing LDRs for budget compliance/variance); including review operative draft of Reply G. Wallace declaration in support of class certification
Brian Umpleire	5/05/2022	0.30	\$925.00	\$277.50	review Protective Order re confidential designations; email to M. Johnson re same
Brian Umpleire	5/05/2022	2.00	\$925.00	\$1,850.00	benchmark variance report project (reviewing LDRs for budget compliance/variance) - Troxy facility
Brian Umpleire	5/05/2022	0.40	\$925.00	\$370.00	review J. Thornton draft of Jones declaration supporting class certification and provide feedback
Brian Umpleire	5/05/2022	0.50	\$925.00	\$462.50	phone call with J. Yellin, M. Johnson re motions to exclude (offensive Saad/Jacobson Dauberts)
Brian Umpleire	5/05/2022	0.70	\$925.00	\$647.50	email to J. Yellin re LDR project (variance/action plans) and phone call re same
Brian Umpleire	5/05/2022	1.00	\$925.00	\$925.00	team call re Class Certification Reply and motions to exclude defense experts Saad and Jacobson - status, strategy
Brian Umpleire	5/05/2022	6.00	\$925.00	\$5,550.00	draft motion to exclude defense experts Saad and Jacobson - Introduction and Jacobson section
Brian Umpleire	5/05/2022	0.60	\$925.00	\$555.00	email with J. Yellin re LDR project and experts for inclusion in class certification reply
Brian Umpleire	5/05/2022	0.30	\$925.00	\$277.50	benchmark variance report project (reviewing LDRs for budget compliance/variance) - review LDRs for Alhambra, Corona, North Euclid, Paulin Creek, S. Tarsana, Irvine, Kettleman Lane, Losi, Loma Linda
Brian Umpleire	5/05/2022	0.30	\$925.00	\$277.50	emails with J. Thornton re draft staffing expert declarations
Brian Umpleire	5/05/2022	0.60	\$925.00	\$555.00	draft control/decree/LDR insert for class certification reply; forward same to G. Wallace for review, comment
Brian Umpleire	5/05/2022	0.30	\$925.00	\$277.50	phone call with J. Yellin re LDR project and analysis for inclusion in class certification reply
Brian Umpleire	5/10/2022	0.30	\$925.00	\$277.50	team call - Class Certification Reply status and update re status of expert motions to exclude
Brian Umpleire	5/10/2022	5.60	\$925.00	\$5,180.00	benchmark variance report project (reviewing LDRs for budget compliance/variance) and emails with J. Yellin re same
Brian Umpleire	5/10/2022	0.30	\$925.00	\$277.50	phone call with R. Steyer re unhapply camper declarations
Brian Umpleire	5/10/2022	0.80	\$925.00	\$740.00	phone call with J. Thornton re staffing expert declarations - status and further edits
Brian Umpleire	5/10/2022	1.40	\$925.00	\$1,295.00	draft Flores Class Certification Reply Declaration outline
Brian Umpleire	5/11/2022	2.20	\$925.00	\$2,035.00	draft Flores Class Certification declarations; forward same to R. Steyer
Brian Umpleire	5/11/2022	1.20	\$925.00	\$1,110.00	GoToMeeting with J. Thornton, D. Marks, M. Johnson, G. Wallace re staffing expert reports
Brian Umpleire	5/11/2022	0.90	\$925.00	\$832.50	LDR / benchmark / action plan project for inclusion in class certification reply materials
Brian Umpleire	5/11/2022	2.60	\$925.00	\$2,405.00	review draft motion to exclude defense expert Jacobson and draft Belson declaration re same subject matter; pull Jacobson deposition excerpts for declaration exhibit
Brian Umpleire	5/11/2022	0.50	\$925.00	\$462.50	phone call with J. Thornton re motion to exclude defense experts Saad and Jacobson
Brian Umpleire	5/12/2022	0.30	\$925.00	\$277.50	emails with M. Johnson re what if anything relies on by defense expert Jacobson under seal
Brian Umpleire	5/12/2022	0.50	\$925.00	\$462.50	phone call with J. Thornton re update on Jones class certification reply declaration; email to M. Johnson re same
Brian Umpleire	5/12/2022	0.60	\$925.00	\$555.00	email to M. Johnson re revised structure for motion to exclude Saad/Jacobson and filing status
Brian Umpleire	5/12/2022	0.50	\$925.00	\$462.50	reviewed unhapply camper declarations; emails with R. Steyer re same
Brian Umpleire	5/12/2022	0.90	\$925.00	\$832.50	draft motion to exclude defense staffing experts - Saad/Jacobson/benchmarks
Brian Umpleire	5/12/2022	5.90	\$925.00	\$5,457.50	LDR project - benchmark compliance and action items; exemplar from each facility for inclusion in class certification reply materials
Kathryn Stehner	5/13/2022	0.60	\$1,300.00	\$780.00	discussion with B. Umpleire re Daubert/motions to exclude Jacobson and Saad.
Brian Umpleire	5/13/2022	3.00	\$925.00	\$2,775.00	draft motion to exclude defense staffing experts - Saad/Jacobson
Brian Umpleire	5/13/2022	0.50	\$925.00	\$462.50	emails with J. Thornton, M. Johnson re Brookdale expert opinion re non-traditional caregivers in clinical department
Brian Umpleire	5/13/2022	0.40	\$925.00	\$370.00	email to J. Thornton re ability of Dr. Flores to sponsor LDR exhibit
Brian Umpleire	5/13/2022	0.40	\$925.00	\$370.00	reviewed unhapply camper declarations; forward same to R. Steyer
Brian Umpleire	5/13/2022	0.30	\$925.00	\$277.50	email to G. Wallace re long-term from the Director's Department for lodging complaints with Brookdale, including re requests for accommodations - re class certification reply
Brian Umpleire	5/13/2022	0.30	\$925.00	\$277.50	phone call with M. Johnson, G. Wallace re class certification reply and staffing expert opinions/evidence
Brian Umpleire	5/13/2022	1.10	\$925.00	\$1,017.50	team call - class certification reply status and updates
Brian Umpleire	5/14/2022	0.50	\$925.00	\$462.50	draft motion to exclude defense experts Jacobson/Saad
Brian Umpleire	5/14/2022	6.00	\$925.00	\$5,550.00	LDR project - benchmark compliance and action items; exemplar from each facility for inclusion in class certification reply materials
Brian Umpleire	5/15/2022	12.00	\$925.00	\$11,100.00	draft Flores Class Certification Reply Declaration
Brian Umpleire	5/15/2022	1.40	\$925.00	\$1,295.00	LDR project re facility benchmark compliance and action items; phone call with J. Yellin and K. Silber re same
Brian Umpleire	5/15/2022	2.70	\$925.00	\$2,497.50	LDR project re facility benchmark compliance and action items
Brian Umpleire	5/16/2022	0.40	\$925.00	\$370.00	draft Flores Class Certification Reply Declaration
Brian Umpleire	5/16/2022	1.20	\$925.00	\$1,110.00	team call - class cert reply update and status
Brian Umpleire	5/16/2022	2.50	\$925.00	\$2,312.50	review/redline draft class certification reply brief
Brian Umpleire	5/16/2022	0.20	\$925.00	\$185.00	phone call with M. Johnson re motion to exclude defense experts Saad and Jacobson testimony
Brian Umpleire	5/16/2022	1.70	\$925.00	\$1,572.50	further edits to motion to exclude defense experts Saad and Jacobson testimony
Brian Umpleire	5/17/2022	8.50	\$925.00	\$7,862.50	review operative drafts of Belson and Jones class certification reply declarations supporting staffing analysis; edits draft motion to exclude Saad and Jacobson defense testimony accordingly, including phone call with M. Johnson and J. Thornton re same
Brian Umpleire	5/17/2022	1.10	\$925.00	\$1,017.50	review class certification reply replies and past cases
Brian Umpleire	5/17/2022	3.60	\$925.00	\$3,330.00	draft and further edits to Flores class certification Reply declaration; email correspondence with team re same re status
Brian Umpleire	5/17/2022	0.50	\$925.00	\$462.50	reviewed unhapply camper declarations supporting class certification; emails with R. Steyer re same
Kathryn Stehner	5/18/2022	1.70	\$1,300.00	\$2,210.00	review draft reply memorandum on class certification; discussion with J. Thornton re same.
Brian Umpleire	5/18/2022	3.00	\$925.00	\$2,775.00	redact "confidential" information from expert reply declarations in absence of filing
Brian Umpleire	5/18/2022	1.10	\$925.00	\$1,017.50	team call re class certification reply update and status
Brian Umpleire	5/18/2022	9.90	\$925.00	\$9,157.50	draft motion to exclude testimony of defense experts Saad and Jacobson - further edits
Brian Umpleire	5/18/2022	0.40	\$925.00	\$370.00	team call re class certification reply update and status
Brian Umpleire	5/18/2022	0.30	\$925.00	\$277.50	phone call with M. Johnson re motion to exclude testimony of defense experts Saad and Jacobson
Brian Umpleire	5/18/2022	12.60	\$925.00	\$11,655.00	further edits to motion to exclude testimony of defense experts Saad and Jacobson
Brian Umpleire	5/20/2022	0.50	\$925.00	\$462.50	review court rules re chambers copies of proposed orders; emails with J. Castro re same
Brian Umpleire	5/23/2022	0.20	\$925.00	\$185.00	forward expert Belson's final unredacted declaration in support of class certification reply to D. Marks for review
Brian Umpleire	5/23/2022	0.20	\$925.00	\$185.00	review defense email re emergency status conference
Brian Umpleire	5/24/2022	0.30	\$925.00	\$277.50	review team correspondence re subsequent/supplemental expert productions on information relied upon in connection with class certification reply briefing
Brian Umpleire	5/25/2022	0.50	\$925.00	\$462.50	team call re subsequent expert productions/motion for briefing on offensive Daubert motions re staffing experts
Brian Umpleire	5/25/2022	0.40	\$925.00	\$370.00	review OSI records for evidence indicating ownership/control by BSL, Inc.
Brian Umpleire	5/25/2022	0.40	\$925.00	\$370.00	email to D. Marks and G. Wallace re potential expert depositions and objections to class certification reply evidence, including local rule re same
Brian Umpleire	5/25/2022	0.20	\$925.00	\$185.00	phone call with D. Marks re expert discovery and deposition timing
Brian Umpleire	5/25/2022	0.30	\$925.00	\$277.50	emails with J. Thornton re Plaintiffs' staffing expert production post reply submission of class certification reply declarations
Brian Umpleire	5/26/2022	0.40	\$925.00	\$370.00	review draft letter brief re Protective Order and Brookdale's confidential designations thereunder; email to M. Johnson re same
Brian Umpleire	5/27/2022	0.50	\$925.00	\$462.50	review and respond to G. Wallace email in opposition to motion to strike supplemental Saad declaration
Brian Umpleire	5/31/2022	3.50	\$925.00	\$3,237.50	review opposition to motion to strike supplemental Saad declaration; legal research re same
Brian Umpleire	6/1/2022	0.30	\$925.00	\$277.50	draft motion re reply re motion to strike supplemental Saad declaration; circulate to team for review and comment
Brian Umpleire	6/1/2022	2.00	\$925.00	\$1,850.00	legal research re striking supplemental expert reports submitted on reply
Brian Umpleire	6/1/2022	0.80	\$925.00	\$740.00	review comments re draft of revised reply too motion to exclude supplemental Saad declaration
Brian Umpleire	6/1/2022	1.50	\$925.00	\$1,367.50	review draft opposition to motion to strike Plaintiffs supplemental / reply expert declarations and edits to same
Brian Umpleire	6/2/2022	3.60	\$925.00	\$3,330.00	review opposition to motion to exclude Saad/Jacobson expert testimony; notes re same for draft reply
Brian Umpleire	6/2/2022	1.80	\$925.00	\$1,665.00	review motion to strike Plaintiffs' attorney declarations; notes and legal research re same for opposition
Brian Umpleire	6/2/2022	0.40	\$925.00	\$370.00	review opposition to request for judicial notice
Brian Umpleire	6/2/2022	2.00	\$925.00	\$1,850.00	but research re timing of production of expert staffing data for analysis in regards to opposition to evidentiary objections; emails and phone call with G. Wallace re same
Brian Umpleire	6/2/2022	0.50	\$925.00	\$462.50	phone call with J. Thornton re class certification and expert pleadings and responses to motions to exclude or strike same
Brian Umpleire	6/2/2022	0.50	\$925.00	\$462.50	emails and phone calls with G. Wallace re facts and arguments contained in defense experts Saad and Jacobson class certification declarations
Brian Umpleire	6/2/2022	0.50	\$925.00	\$462.50	review Brookdale's oppositions to motions to exclude defense experts Saad and Jacobson and notes re same
Kathryn Stehner	6/5/2022	1.30	\$1,300.00	\$1,160.00	meet with B. Umpleire re class certification expert motions / replies in support of motions to exclude Defendants' staffing-related experts and overview of Defendants' opposition papers re Saad, Jacobson and other motions to strike including attorney declarations
Brian Umpleire	6/5/2022	0.60	\$925.00	\$555.00	emails with J. Thornton re defense expert Saad's use of data in his analysis not available to Plaintiffs' experts
Brian Umpleire	6/5/2022	2.50	\$925.00	\$2,312.50	draft reply in support of motion to exclude testimony of defense experts Saad/Jacobson - outline
Brian Umpleire	6/5/2022	0.50	\$925.00	\$462.50	conference call with G. Wallace, M. Johnson, D. Marks, J. Thornton re reply in support of motion to exclude defense experts Saad and Jacobson
Brian Umpleire	6/5/2022	0.70	\$925.00	\$647.50	review J. Thornton notes on Brookdale's opposition to motion to exclude testimony from defense experts Saad and Jacobson
Brian Umpleire	6/6/2022	0.60	\$925.00	\$555.00	review M. Johnson, G. Wallace email highlights of points to address in Saad/Jacobson expert declarations on reply/redraft
Brian Umpleire	6/6/2022	1.00	\$925.00	\$925.00	meet with K. Stehner re class certification expert motions / replies in support of motions to exclude Defendants' staffing

Brian Umperle	6/8/2022	4.50	\$925.00	\$4,162.50	further edits to reply in support motion to exclude defense experts Saad/Jacobson; emails with M. Johnson, G. Wallace re same
Brian Umperle	6/8/2022	0.50	\$925.00	\$462.50	discuss status of class certification expert motions with K. Stehner
Brian Umperle	6/8/2022	7.00	\$925.00	\$7,122.50	further edits to reply in support of motion to exclude defense experts Saad/Jacobson, citations to record, admin motion to file under seal and proposed order, proposed redactions; including phone calls with GW, DM re same,
Brian Umperle	6/10/2022	0.20	\$925.00	\$185.00	emails with G. Wallace re potential class certification hearing/demonstratives
Brian Umperle	6/13/2022	0.20	\$925.00	\$185.00	review correspondence re stipulating to continuing hearing dates
Brian Umperle	6/14/2022	0.40	\$925.00	\$370.00	email correspondence with team re Brookdale confidential designations / filing under seal
Brian Umperle	6/15/2022	0.20	\$925.00	\$185.00	review draft discovery letter brief re Brookdale's confidential designations
Brian Umperle	6/15/2022	1.00	\$925.00	\$925.00	Review/comment on draft opposition to motion to strike attorney declarations submitted in support of class certification
Brian Umperle	6/15/2022	0.60	\$925.00	\$555.00	review draft letter brief motion to exclude attorney declarations submitted in support of class certification
Brian Umperle	6/16/2022	0.30	\$925.00	\$277.50	phone call with D. Marks re expert discovery, potential expert depositions, and timing re same
Brian Umperle	6/17/2022	0.40	\$925.00	\$370.00	review internal correspondence re expert production / package files
Brian Umperle	6/20/2022	0.50	\$925.00	\$462.50	emails and phone calls with J. Thornton re discovery requests applicable to staffing experts
Brian Umperle	6/21/2022	0.50	\$925.00	\$462.50	email to J. Thornton re Schroyer class certification declaration and Belson potential expert reply declaration in relation to defense expert Saad analysts
Brian Umperle	6/21/2022	0.20	\$925.00	\$185.00	review M. Johnson email to Brookdale re under seal filing
Kathryn Stehner	6/22/2022	0.40	\$1,300.00	\$520.00	meet with B. Umperle re counsel meeting re expert discovery issues including potential depositions and outstanding document/data productions
Brian Umperle	6/22/2022	0.50	\$925.00	\$462.50	conference call with M. Johnson, G. Wallace, D. Marks, J. Thornton re expert discovery - timing, tasks
Brian Umperle	6/22/2022	0.40	\$925.00	\$370.00	phone call with K. Stehner re expert discovery issues including potential depositions and outstanding document/data productions
Brian Umperle	6/23/2022	3.50	\$925.00	\$3,237.50	review class certification papers and draft questions for hearing/preparation session
Brian Umperle	6/23/2022	6.80	\$925.00	\$6,290.00	compile list of undisputed facts from staffing expert declarations / review Saad, Jacobson, Flores, Schroyer declarations - re class certification hearing preparation
Brian Umperle	6/23/2022	1.00	\$925.00	\$925.00	review Defendants' reply in support of motion to strike attorney declarations
Brian Umperle	6/27/2022	5.50	\$925.00	\$5,087.50	compile list of undisputed facts from staffing expert declarations / review Saad, Jacobson, Flores, Schroyer declarations - re class certification hearing preparation
Brian Umperle	6/28/2022	2.50	\$925.00	\$2,312.50	compile list of undisputed facts from staffing expert declarations / review Jones, Belson - re class certification hearing preparation
Brian Umperle	6/28/2022	2.60	\$925.00	\$2,405.00	review most questions / Transkation and other standing-related issues - for class cert hearing preparation
Brian Umperle	6/28/2022	0.40	\$925.00	\$370.00	review summary of discovery meet and confer session including re production of staffing expert materials
Brian Umperle	6/29/2022	1.80	\$925.00	\$1,665.00	meet court prep with G. Wallace and team
Kathryn Stehner	7/1/2022	1.00	\$1,300.00	\$1,300.00	meet with B. Umperle re status of class certification hearing preparation and expert discovery
Brian Umperle	7/1/2022	1.00	\$925.00	\$925.00	conference call with M. Johnson, D. Marks, J. Thornton re expert discovery responses and production of further materials relied upon
Brian Umperle	7/1/2022	0.50	\$925.00	\$462.50	meeting with K. Stehner re class cert hearing preparation
Brian Umperle	7/3/2022	1.30	\$925.00	\$1,202.50	conference call with G. Wallace, M. Johnson, J. Thornton, D. Marks re experts and class certification, in advance of call re same
Brian Umperle	7/3/2022	0.60	\$925.00	\$555.00	review G. Wallace questions re staffing analysis and class certification, in advance of call re same
Brian Umperle	7/6/2022	4.20	\$925.00	\$3,885.00	phone call with J. Thornton re Plaintiff's expert Flores' class certification argument points; sources/cites for Flores arguments
Brian Umperle	7/6/2022	0.20	\$925.00	\$185.00	compile and forward journal articles relied on by Plaintiff's expert Flores in support of class certification to G. Wallace
Brian Umperle	7/6/2022	1.30	\$925.00	\$1,202.50	class certification hearing project - 3 'best' stories of bad outcomes re Plaintiff Ralph Schmidt
Brian Umperle	7/6/2022	0.90	\$925.00	\$832.50	review Marks' answers to G. Wallace staffing analysis / class certification questions
Brian Umperle	7/10/2022	1.00	\$925.00	\$925.00	class certification hearing preparation - email correspondence with J. Thornton re staffing expert demonstratives for class certification hearing and determination of staffing expert exhibits already in the record
Brian Umperle	7/10/2022	0.70	\$925.00	\$647.50	emails with JT re class cert demonstratives, citations to record.
Kathryn Stehner	7/8/2022	3.00	\$1,300.00	\$3,900.00	hearing on Pt's motion for class certification; ND Cal (Oakland); Judge Gilliam.
Brian Umperle	7/8/2022	2.50	\$925.00	\$2,312.50	attend class certification hearing, N.D. Cal. (Oakland), Judge Gilliam
Brian Umperle	7/8/2022	1.60	\$925.00	\$1,500.00	email summary of class certification hearing forward same to G. Wallace for review, comment
Brian Umperle	7/8/2022	0.60	\$925.00	\$555.00	discuss class certification hearing among team - perceived highlights and trouble points
Kathryn Stehner	7/9/2022	0.70	\$1,300.00	\$910.00	discuss class certification hearing with B. Umperle
Brian Umperle	7/12/2022	1.00	\$925.00	\$925.00	team call re under seal filing and strategy re Order re same
Brian Umperle	7/13/2022	0.50	\$925.00	\$462.50	review email correspondence re confidentiality of Flores/Schroyer depo testimony
Brian Umperle	7/18/2022	0.50	\$925.00	\$462.50	conference with M. Johnson, J. Thornton, D. Marks re Plaintiff's experts Flores and Schroyer materials that need to be filed under seal
Brian Umperle	7/18/2022	0.20	\$925.00	\$185.00	review email re confidentiality of Flores/Schroyer depo testimony
Brian Umperle	7/19/2022	0.50	\$925.00	\$462.50	review Order re similar understanding case denying motion to seal order granting motion for class certification; forward and email to G. Wallace re same
Brian Umperle	7/21/2022	0.50	\$925.00	\$462.50	review draft sealing papers
Brian Umperle	7/21/2022	0.50	\$925.00	\$462.50	phone call with G. Wallace re under seal B. Umperle declaration exhibits, review email re same
Brian Umperle	7/22/2022	2.70	\$925.00	\$2,497.50	review draft under seal papers re Schroyer class certification declaration Exs. C, D, E, J Flores Exs. B, KK, LL, and email response to G. Wallace re Plaintiff's position on need for sealing
Brian Umperle	8/1/2022	0.50	\$925.00	\$462.50	review updated discovery production spreadsheet re current status and required follow up
Brian Umperle	8/9/2022	0.40	\$925.00	\$370.00	review and comment re list of potential summary judgment issues
Brian Umperle	8/18/2022	0.30	\$925.00	\$277.50	review draft discovery letter brief seeking to compel production of defense expert Anderson-related expert documents
Brian Umperle	8/18/2022	0.50	\$925.00	\$462.50	review summary of discovery meet and confer session including re production of staffing expert materials
Brian Umperle	8/26/2022	0.30	\$925.00	\$277.50	review Defendants' portion of discovery letter brief re production of defense expert Anderson materials
Brian Umperle	8/26/2022	0.70	\$925.00	\$647.50	email to M. Johnson re defense expert Anderson materials letter brief and summary of Special Master Guilford's discovery ruling in similar understanding litigation re same issue
Kathryn Stehner	9/12/2022	0.90	\$1,300.00	\$1,170.00	meet with B. Umperle re status and strategy of offensives/defensive summary judgment
Brian Umperle	9/14/2022	0.40	\$925.00	\$370.00	team call re update / summary judgment thoughts
Brian Umperle	9/14/2022	0.50	\$925.00	\$462.50	review D. Mont. case re ADA standing, public accommodations
Brian Umperle	9/16/2022	0.60	\$925.00	\$555.00	review draft of motion for relief from Magistrate's Order of 9/2/22
Brian Umperle	9/16/2022	0.10	\$925.00	\$92.50	review current discovery order issued today re further discovery motions
Kathryn Stehner	9/30/2022	1.10	\$1,300.00	\$1,430.00	review Defendants' motion to stay discovery
Kathryn Stehner	9/30/2022	0.30	\$1,300.00	\$390.00	meet with B. Umperle re Defendants' motion to stay discovery re potential impact
Brian Umperle	9/30/2022	1.00	\$925.00	\$925.00	review Defendants' motion to stay discovery
Brian Umperle	10/10/2022	0.50	\$925.00	\$462.50	review briefing re similar understanding litigation re stay pending ruling on class cert; notes re same in preparation for call with A. Xu re no motion to stay
Brian Umperle	10/10/2022	0.40	\$925.00	\$370.00	phone call with A. Xu re opposing motion to stay discovery pending class certification ruling in similar understanding litigation
Brian Umperle	10/11/2022	0.30	\$925.00	\$277.50	emails with D. Marks re oppositions to exclude Plaintiff's staffing experts Flores and Schroyer
Brian Umperle	10/12/2022	0.20	\$925.00	\$185.00	email correspondence with D. Marks re class certification opposition and staffing analysis
Brian Umperle	10/13/2022	0.40	\$925.00	\$370.00	review draft opposition to motion to stay; email to A. Xu and team re same
Brian Umperle	10/14/2022	0.70	\$925.00	\$647.50	review operative draft of discovery letter brief re defense expert Anderson materials; email to team re same strategy with stay motion
Brian Umperle	10/14/2022	0.20	\$925.00	\$185.00	email with R. Bonner re defendants' privilege log produced yesterday
Brian Umperle	10/15/2022	0.50	\$925.00	\$462.50	review operative draft of letter brief re compel defense expert Anderson expert materials
Kathryn Stehner	10/18/2022	0.50	\$1,300.00	\$650.00	receive update from B. Umperle re discovery status pending ruling on class certification
Brian Umperle	10/19/2022	0.40	\$925.00	\$370.00	review A. Xu email with additional edits to Anderson expert materials discovery brief re work product protection
Brian Umperle	10/19/2022	2.50	\$925.00	\$2,312.50	email correspondence and record research re defense expert Crandall's opinions on Flores task times and Table 3 in supporting declaration; draft argument responding to same; discussion with J. Thornton re same
Brian Umperle	10/19/2022	0.50	\$925.00	\$462.50	meeting with K. Stehner re discovery status pending ruling on class certification
Kathryn Stehner	11/29/2022	0.40	\$1,300.00	\$920.00	email to B. Umperle re composition of proposed subclasses
Kathryn Stehner	11/30/2022	0.40	\$1,300.00	\$920.00	review B. Umperle email re ADA subclasses and (b)(2)/(b)(3) certification
Brian Umperle	12/10/2022	0.50	\$925.00	\$462.50	email to K. Stehner re ADA subclasses and (b)(2)/(b)(3) certification
Brian Umperle	12/9/2022	1.50	\$925.00	\$1,387.50	phone call with D. Marks, J. Thornton re expert information relied upon / production
Brian Umperle	12/9/2022	0.40	\$925.00	\$370.00	discussion with J. Thornton re payroll data sample used in staffing analysis
Brian Umperle	1/5/2023	0.20	\$925.00	\$185.00	review M. Johnson email re expert photographs used in motions for summary judgment
Brian Umperle	1/17/2023	0.30	\$925.00	\$277.50	emails with G. Wallace re Rule 23 report
Brian Umperle	1/19/2023	0.20	\$925.00	\$185.00	email correspondence with A. Xu re client correspondence (Fisher/Schmidt) re case update
Kathryn Stehner	2/23/2023	0.60	\$925.00	\$555.00	review D. Marks email re possible additional discovery from G. 'sample' facilities including pendant data, billing details, identities of staff, room numbers
Brian Umperle	2/17/2023	0.50	\$1,300.00	\$1,140.00	review B. Umperle memo re case status, discovery status, potential summary judgment, efforts to obtain class members' contact information
Brian Umperle	2/17/2023	0.70	\$925.00	\$647.50	Team call - re case status, discovery status, motion(s) for summary judgment, obtaining updated list of current residents
Brian Umperle	2/17/2023	0.60	\$925.00	\$555.00	review draft RPD Set 9 and letter re access improvement/discovery and email correspondence re same
Brian Umperle	2/21/2023	0.40	\$925.00	\$370.00	email correspondence with G. Wallace re Smith v Apple and injury in fact
Brian Umperle	2/27/2023	0.20	\$925.00	\$185.00	review internal email correspondence re RPD Set 9 edits
Brian Umperle	2/28/2023	0.30	\$925.00	\$277.50	review revised discovery meet and confer letter re access improvement/discovery, updated class list, and defense expert Anderson materials
Brian Umperle	3/1/2023	0.60	\$925.00	\$555.00	review discovery meet and confer letter to Brookdale re updated resident list, access improvements, production of defense expert Anderson materials
Brian Umperle	3/6/2023	0.50	\$925.00	\$462.50	review Defendants' motion to stay discovery
Kathryn Stehner	3/9/2023	0.50	\$1,300.00	\$650.00	review Order granting Defendants' motion to stay discovery pending ruling on class certification
Brian Umperle	3/9/2023	0.30	\$1,300.00	\$390.00	meet with B. Umperle on Order granting Defendants' motion to stay discovery pending class certification ruling
Brian Umperle	3/9/2023	0.50	\$925.00	\$462.50	review Order granting Defendants' motion to stay discovery pending class certification ruling and team email correspondence re same
Brian Umperle	3/11/2023	0.50	\$925.00	\$462.50	team call re case status, discovery stay, motion(s) for summary judgment
Brian Umperle	3/13/2023	0.20	\$925.00	\$185.00	review discovery review/status memo in advance of team call re same
Kathryn Stehner	3/18/2023	0.40	\$1,300.00	\$520.00	meet with G. Wallace re case status, discovery stay, and motion for summary judgment
Kathryn Stehner	3/30/2023	2.00	\$1,300.00	\$2,600.00	review class certification order
Kathryn Stehner	3/30/2023	0.60	\$1,300.00	\$780.00	discussion with G. Wallace and B. Umperle of class certification order
Brian Umperle	3/30/2023	7.10	\$925.00	\$6,567.50	review class certification order; email/phone calls with K. Stehner and G. Wallace re surviving class claims and strategy
Brian Umperle	3/30/2023	0.70	\$925.00	\$647.50	team call re order granting (b)(2) class certification and denying (b)(3) classes
Brian Umperle	4/3/2023	3.50	\$925.00	\$3,237.50	review email/comment on Rule 23(b) petition; email to G. Wallace and M. Johnson re same
Kathryn Stehner	4/3/2023	0.50	\$1,300.00	\$650.00	review draft Rule 23 petition for review denial of class certification
Brian Umperle	4/3/2023	3.40	\$925.00	\$3,145.00	draft CLRA section of 23(b) petition; legal research re same
Brian Umperle	4/3/2023	1.00	\$925.00	\$925.00	team call re Rule 23(b) petition
Kathryn Stehner	4/4/2023	0.30	\$1,300.00	\$390.00	meet with B. Umperle re draft Rule 23 petition re denial of class cert
Brian Umperle	4/4/2023	4.30	\$925.00	\$3,977.50	draft CLRA/draft insert for Rule 23(b) petition; legal research re same
Brian Umperle	4/6/2023	9.30	\$925.00	\$8,602.50	draft Rule 23(b) Reply - misrepresentation and omissions and predominance insert
Brian Umperle	4/6/2023	4.20	\$925.00	\$3,885.00	draft Rule 23(b) Reply - misrepresentation and omissions and predominance insert
Brian Umperle	4/6/2023	0.50	\$925.00	\$462.50	team call re appellate petition status, further strategy on class certification in district court
Brian Umperle	4/6/2023	2.60	\$925.00	\$2,405.00	review / edit operative Rule 23(b) draft; email to G. Wallace re same
Brian Umperle	4/7/2023	5.00	\$925.00	\$4,625.00	draft shortened version of Rule 23(b) insert forward same to group for review and comment
Kathryn Stehner	4/10/2023	0.40	\$1,300.00	\$520.00	review B. Umperle memo re appeal, case status / strategy
Brian Umperle	4/10/2023	0.70	\$925.00	\$647.50	team call re appeal, status, strategy
Brian Umperle	4/10/2023	6.30	\$925.00	\$5,827.50	review/edit to latest draft of Rule 23(b) petition
Brian Umperle	4/10/2023	0.30	\$925.00	\$277.50	discuss draft Rule 23(b) petition with K. Stehner
Brian Umperle	4/12/2023	0.80	\$925.00	\$740.00	legal research / Case class list for CLRA insert in Rule 23(b) petition
Brian Umperle	4/12/2023	0.50	\$925.00	\$462.50	review draft CMC statement; email to G. Wallace re same
Brian Umperle	4/12/2023	0.60	\$925.00	\$555.00	team call re appeal status / strategy
Brian Umperle	4/12/2023	1.50	\$925.00	\$1,387.50	review/edit to operative draft of Rule 23(b) petition
Kathryn Stehner	4/13/2023	0.30	\$1,300.00	\$390.00	review draft Rule 23(b) petition and discussion with B. Umperle re same
Brian Umperle	4/13/2023	1.10	\$925.00	\$1,017.50	review operative draft of 23(b) petition; comments to G. Wallace
Brian Umperle	4/13/2023	0.50	\$925.00	\$462.50	team call re Rule 23(b) petition and CMC Statement - status
Brian Umperle	4/17/2023	1.00	\$925.00	\$925.00	legal research re class certification evidence sufficient to demonstrate predominance and standing
Brian Umperle	4/17/2023	0.80	\$925.00	\$740.00	team call re procedural strategy/case management conference request
Brian Umperle	4/19/2023	6.50	\$925.00	\$6,012.50	Legal research re successive class certification motions, leave to amend, permissive joinder.
Brian Umperle	4/20/2023	6.00	\$925.00	\$5,550.00	legal research re amend the complaint to add and class reps and then seek facility-level class certification
Brian Umperle	4/20/2023	5.50	\$925.00	\$5,087.50	legal research re successive class certification motions, leave to amend, permissive joinder and memo re same to G. Wallace and team
Brian Umperle	4/21/2023	0.30	\$925.00	\$277.50	phone call with G. Wallace re ability of estate to seek injunctive relief, leave to amend
Brian Umperle	4/21/2023	2.60	\$925.00	\$2,405.00	legal research re injunctive relief by estate
Brian Umperle	4/21/2023	1.10	\$925.00	\$1,017.50	team call re case management conference strategy
Kathryn Stehner	4/24/2023	0.50	\$1,300.00	\$650.00	review Defendants' opposition to Rule 23 petition for review
Brian Umperle	4/24/2023	0.30	\$1,300.00	\$390.00	discuss Defendants' opposition to Rule 23 petition to review with B. Umperle
Brian Umperle	4/24/2023	0.40	\$925.00	\$370.00	review team email re status of new plaintiff outreach project
Brian Umperle	4/24/2023	1.00	\$925.00	\$925.00	review Rule 23(b) Opposition
Brian Umperle	4/25/2023	1.20	\$925.00	\$1,110.00	review Rule 23(b) Opposition; notes re same
Brian Umperle	4/25/2023	0.50	\$925.00	\$462.50	team zoom re case management conference strategy and Rule 23(b) Reply
Brian Umperle	4/26/2023	0.40	\$925.00	\$370.00	email with internal staff re communication with putative class member re status of class action case
Brian Umperle	4/26/2023	4.80	\$925.00	\$4,440.00	draft inserts for 23(b) reply re CLRA and Elder Abuse claims; emails and phone calls with G. Wallace re same
Brian Umperle	4/27/2023	4.50	\$925.00	\$4,162.50	draft inserts for 23(b) reply re CLRA and Elder Abuse claims; emails and phone calls with G. Wallace re same
Brian Umperle	4/29/2023	7.00	\$925.00	\$6,475.00	draft CLRA portion of Rule 23(b) Reply; team Zoom re same; phone calls with G. Wallace re same
Brian Umperle	4/29/2023	7.00	\$925.00	\$6,475.00	draft CLRA portion of Rule 23(b) Reply; team Zoom re same; phone calls with G. Wallace re same
Kathryn Stehner	4/30/2023	0.50	\$1,300.00	\$650.00	meet with B. Umperle re Elder Abuse/CLRA portions of Rule 23 Reply
Brian Umperle	4/30/2023	0.40	\$925.00	\$370.00	phone call with G. Wallace re Reply re support of Rule 23(b) petition
Brian Umperle	4/30/2023	0.50	\$925.00	\$462.50	phone call with K. Stehner re Elder Abuse/CLRA portions of Rule 23(b) Reply
Brian Umperle	5/8/2023	0.80	\$925.00	\$740.00	review draft motion requesting notice of certification of (b)(2) class
Brian Umperle					

Brian Umpleire	8/10/2023	0.20	\$925.00	\$185.00	review meet and confer correspondence re filing administrative motion to lift discovery stay and further case management conference
Brian Umpleire	8/23/2023	0.30	\$925.00	\$277.50	internal email correspondence re case / motion schedule going forward
Kathryn Stehner	8/23/2023	0.40	\$1,300.00	\$260.00	review case management conference summary memo including overall status and next steps re class certification and schedule
Brian Umpleire	8/23/2023	2.20	\$925.00	\$2,035.00	legal research re whether claim for injunctive relief survives deceased plaintiff's email to G. Wallace re same
Brian Umpleire	8/23/2023	0.40	\$925.00	\$370.00	phone call with G. Wallace re upcoming case management conference and next steps/strategy in light of class certification status and rulings
Brian Umpleire	8/31/2023	0.70	\$925.00	\$647.50	read/review B2A case management conference transcript re potential for subclasses
Brian Umpleire	9/1/2023	0.50	\$925.00	\$462.50	telephone call with putative class member re case status
Brian Umpleire	9/8/2023	1.00	\$925.00	\$925.00	team call re status/case schedule/hearing assignments - strategy in light of class certification rulings
Kathryn Stehner	9/10/2023	0.50	\$1,300.00	\$650.00	meet with B. Umpleire plan for renewed motion for class certification and summary judgment motions
Brian Umpleire	9/12/2023	0.50	\$925.00	\$462.50	meetings with K. Stehner re renewed motion for class certification
Kathryn Stehner	9/20/2023	0.30	\$1,300.00	\$390.00	discuss certifiability of financial elder abuse claim with B. Umpleire
Brian Umpleire	9/20/2023	0.50	\$925.00	\$462.50	phone call with G. Wallace re renewed class cert motion - assigned tasks
Brian Umpleire	9/20/2023	0.30	\$925.00	\$277.50	email correspondence with G. Wallace and M. Johnson re feasibility of pursuing class elder financial abuse claim given case history
Brian Umpleire	9/21/2023	0.10	\$925.00	\$46.25	review G. Wallace legal re new class cert motion / motion for subclasses
Brian Umpleire	9/22/2023	1.10	\$925.00	\$1,017.50	team call re renewed class certification subclasses motion, motion for summary judgment, and assigned tasks / strategy for completion
Brian Umpleire	9/26/2023	6.70	\$925.00	\$6,137.50	draft Flores supporting declaration re new motion for certification of subclasses
Brian Umpleire	9/26/2023	0.60	\$925.00	\$462.50	emails to experts (Flores (staffing, Kennedy (damages)) re further supporting declarations in support of new motion for certification of subclasses
Brian Umpleire	9/26/2023	0.50	\$925.00	\$462.50	email to D. Marks, J. Thornton re Schroyer declaration supporting new motion for certification of subclasses and resident with disabilities update from Dr. Flores
Brian Umpleire	9/26/2023	0.50	\$925.00	\$462.50	review revised outline of revised motion for subclasses and discussion with G. Wallace re same
Brian Umpleire	9/26/2023	3.30	\$925.00	\$3,052.50	Revised draft Flores class certification declaration on subclasses theory
Brian Umpleire	9/26/2023	5.70	\$925.00	\$5,272.50	Revised draft Schroyer class certification declaration on subclasses theory
Brian Umpleire	9/27/2023	3.90	\$925.00	\$3,607.50	Revised draft Flores class certification declaration on subclasses theory
Brian Umpleire	9/27/2023	6.80	\$925.00	\$6,290.00	Revised draft Schroyer class certification declaration on subclasses theory
Brian Umpleire	9/28/2023	0.40	\$925.00	\$370.00	emails with D. Marks and J. Thornton re Flores' resident disability profiles
Brian Umpleire	9/28/2023	2.50	\$925.00	\$2,312.50	legal research re Supreme Court's decision in Geography and ability to pursue injunctive relief by way of subclasses after prior denial of certification; discussion with G. Wallace re same
Brian Umpleire	9/28/2023	1.30	\$925.00	\$1,202.50	team Zoom re strategy and status of tasks on renewed motion for certification of subclasses
Brian Umpleire	9/28/2023	2.10	\$925.00	\$1,942.50	draft Flores expert declaration supporting new motion for certification of subclasses
Brian Umpleire	9/28/2023	1.00	\$925.00	\$925.00	team call - cases status and strategy, meet with Flores
Brian Umpleire	9/29/2023	0.50	\$925.00	\$462.50	review team correspondence re edits/thoughts to draft class certification outline and count/corner point re same
Brian Umpleire	9/30/2023	3.00	\$925.00	\$2,775.00	draft Flores expert declaration in support of new motion for certification of subclasses
Brian Umpleire	9/30/2023	4.50	\$925.00	\$4,162.50	legal research re Supreme Court's decision in Geography and ability to pursue injunctive relief by way of subclasses after prior denial of certification
Brian Umpleire	9/30/2023	4.50	\$925.00	\$4,162.50	Geography-related legal research re class certification, subclasses, and motions
Kathryn Stehner	10/2/2023	2.00	\$1,300.00	\$2,600.00	draft supplemental expert declarations supporting renewed subclasses motion (Flores, Schroyer, Kennedy)
Brian Umpleire	10/2/2023	8.50	\$925.00	\$7,862.50	Geography-related legal research and draft insert re motion for leave for certification subclasses
Brian Umpleire	10/2/2023	5.30	\$925.00	\$4,902.50	edit to expert declaration re Kennedy in support of new motion for certification of subclasses
Brian Umpleire	10/3/2023	2.90	\$925.00	\$2,682.50	edit to Flores expert declaration in support of new motion for certification of subclasses
Brian Umpleire	10/3/2023	0.20	\$925.00	\$185.00	discussion with G. Grunfeld re Plaintiff Schmätzki, Fisher and willingness to proceed
Brian Umpleire	10/4/2023	3.10	\$925.00	\$2,867.50	edit to Flores expert declaration in support of new motion for certification of subclasses
Brian Umpleire	10/4/2023	0.40	\$925.00	\$370.00	team email correspondence re renewed class certification motion - permission to file and styling of same
Brian Umpleire	10/4/2023	0.30	\$925.00	\$277.50	email correspondence with G. Wallace, D. Marks, and J. Thornton re numerous of disabled residents
Brian Umpleire	10/5/2023	6.40	\$925.00	\$5,920.00	finalize edits to revised Flores expert declaration and forward to G. Wallace for review and comment
Brian Umpleire	10/5/2023	0.40	\$925.00	\$370.00	discussion with G. Wallace re application of Geography and request for subclasses, motions
Brian Umpleire	10/5/2023	2.40	\$925.00	\$2,220.00	further edits to expert Kennedy declaration, forward to G. Wallace for review and comment
Brian Umpleire	10/6/2023	1.50	\$925.00	\$1,387.50	review and edits to discovery letter brief re seeking to compel Brookdale's production of staffing formula; forward to M. Johnson for review and comment
Brian Umpleire	10/6/2023	0.60	\$925.00	\$555.00	phone calls with G. Wallace re elder abuse claim and meaning of funds of an elder
Brian Umpleire	10/6/2023	0.40	\$925.00	\$370.00	further edits to revised Flores expert declaration re assisted living background facts
Brian Umpleire	10/6/2023	0.80	\$925.00	\$740.00	further edits to Kennedy expert declaration re community fee evidence; forward same to P. Kennedy for review and comment
Brian Umpleire	10/6/2023	0.60	\$925.00	\$555.00	further edits to Schroyer expert declaration
Brian Umpleire	10/6/2023	1.00	\$925.00	\$925.00	team call - status of assignments re motion for certification of subclasses and further strategy
Brian Umpleire	10/6/2023	1.50	\$925.00	\$1,480.00	phone call with J. Thornton re Flores expert declaration edits, support, and additional requirements
Brian Umpleire	10/6/2023	0.70	\$925.00	\$647.50	discussion with counsel re financial elder abuse claim with non-elder payors, review Cork case
Brian Umpleire	10/6/2023	2.30	\$925.00	\$2,127.50	further edits to Flores expert declaration based on call with J. Thornton
Brian Umpleire	10/6/2023	1.20	\$925.00	\$1,110.00	Shepherdize Geography Supreme Court cases and find similar authorities
Kathryn Stehner	10/7/2023	0.30	\$1,300.00	\$390.00	discuss with B. Umpleire elder abuse claim based on other payors
Brian Umpleire	10/7/2023	0.30	\$925.00	\$277.50	phone call with G. Wallace re Flores expert declaration status and non-elder payors research re elder abuse class claim
Brian Umpleire	10/7/2023	7.50	\$925.00	\$6,937.50	further edits to Schroyer expert declaration
Brian Umpleire	10/8/2023	8.20	\$925.00	\$7,585.00	Flores expert declaration edits, forward to J. Thornton and G. Wallace for review and comment
Brian Umpleire	10/8/2023	0.70	\$925.00	\$647.50	Schroyer re regulations requiring records of community fees and email to G. Wallace re same, re motion for certification of subclasses
Brian Umpleire	10/10/2023	5.50	\$925.00	\$5,087.50	edit to draft Geography insert for motion for leave for subclasses based on phone call with G. Wallace re same
Brian Umpleire	10/10/2023	1.20	\$925.00	\$1,110.00	further edits to Kennedy expert declaration re new motion for certification of subclasses
Brian Umpleire	10/10/2023	0.40	\$925.00	\$370.00	review administrative motion to exceed page limitation and email to M. Johnson re same
Brian Umpleire	10/11/2023	1.00	\$925.00	\$925.00	team call re status and update on assignments re motion for certification of subclasses
Brian Umpleire	10/11/2023	1.80	\$925.00	\$1,665.00	review and comment on operative draft of motion for leave for subclasses
Brian Umpleire	10/11/2023	0.90	\$925.00	\$832.50	edit and revise previous Jones declaration in support of class certification to conform to motion for certification of subclasses
Kathryn Stehner	10/12/2023	0.50	\$1,300.00	\$650.00	review operative draft of motion for leave for subclasses
Brian Umpleire	10/12/2023	4.70	\$925.00	\$4,347.50	edit and revise previous Belson declaration in support of class certification to conform to motion for certification of subclasses
Brian Umpleire	10/12/2023	0.70	\$925.00	\$647.50	email correspondence with G. Wallace re class certification that they would not have paid had they been given complete information
Brian Umpleire	10/12/2023	0.40	\$925.00	\$370.00	Call with G. Wallace, M. Johnson, J. Thornton, D. Marks re staffing expert declarations in support of motion for leave to file the motion for certification of subclasses
Brian Umpleire	10/13/2023	1.00	\$925.00	\$925.00	team call re status and update on assignments re motion for leave to file motion for certification of subclasses
Brian Umpleire	10/13/2023	5.30	\$925.00	\$4,902.50	Belson and Jones expert declaration edits to conform to motion for leave to file motion for certification of subclasses
Brian Umpleire	10/14/2023	2.10	\$925.00	\$1,942.50	phone call with J. Thornton re Flores expert declaration edits and resident disability profile
Brian Umpleire	10/14/2023	1.70	\$925.00	\$1,572.50	draft Flores expert declaration in support of motion for leave to file motion for certification of subclasses - further edits re resident disability profile section
Brian Umpleire	10/15/2023	0.50	\$925.00	\$462.50	phone call with G. Wallace re update on status of staffing related expert declarations (Flores, Schroyer, Belson, Jones)
Brian Umpleire	10/15/2023	0.60	\$925.00	\$555.00	phone call with J. Thornton and D. Marks re further edits to Belson declaration to address anticipated defense arguments on motion for leave to file motion for certification of subclasses
Brian Umpleire	10/15/2023	2.00	\$925.00	\$1,850.00	further Belson expert declaration edits re motion for leave to file motion for certification of subclasses
Brian Umpleire	10/16/2023	1.50	\$925.00	\$1,387.50	further Jones expert declaration edits re motion for leave to file motion for certification of subclasses
Brian Umpleire	10/16/2023	2.50	\$925.00	\$2,312.50	further Flores expert declaration in support of motion for leave to file motion for certification of subclasses re DSS citations excerpted from B. Bien-Kahn class certification declaration
Brian Umpleire	10/16/2023	1.10	\$925.00	\$1,017.50	review and comment on operative draft of motion for leave to file motion for certification of subclasses
Brian Umpleire	10/16/2023	1.70	\$925.00	\$1,572.50	discussion with G. Wallace re damages expert Kennedy's analysis and testimony re community fee - reviewed compare with testimony proffered in similar understaffing litigation and email to G. Wallace re same
Brian Umpleire	10/17/2023	0.30	\$925.00	\$277.50	email to B. Bien-Kahn re DSS citations as support for Dr. Flores' expert opinions in declaration supporting motion for leave to file motion for certification of subclasses
Brian Umpleire	10/17/2023	5.30	\$925.00	\$4,902.50	review operative draft of motion for leave to file motion for certification of subclasses, insert Flores/Schroyer/Jones/Belson expert declaration citations
Brian Umpleire	10/17/2023	0.20	\$925.00	\$185.00	email to P. Kennedy re status check on draft declaration in support of motion for leave to file motion for certification of subclasses
Brian Umpleire	10/17/2023	1.10	\$925.00	\$1,017.50	review and edits to draft declaration of Dr. Bedi re consumer survey in support of motion for leave to file motion for certification of subclasses
Brian Umpleire	10/17/2023	0.40	\$925.00	\$370.00	phone call with G. Wallace re draft Bedi declaration re consumer survey in support of motion for leave to file motion for certification of subclasses
Brian Umpleire	10/17/2023	1.50	\$925.00	\$1,387.50	phone call with experts Dr. Bedi and P. Kennedy, G. Wallace, M. Johnson, J. Thornton, T. Cotte, L. Pessie re draft Bedi and Kennedy declarations supporting motion for certification of subclasses
Kathryn Stehner	10/18/2023	0.40	\$1,300.00	\$320.00	review expert Bedi draft declaration in support of motion for subclasses
Kathryn Stehner	10/18/2023	0.30	\$1,300.00	\$390.00	meet with B. Umpleire re final draft of motion for leave for subclasses, new survey expert Bedi
Brian Umpleire	10/18/2023	13.00	\$925.00	\$12,025.00	further edits to motion for leave to file motion for certification of subclasses, citations; finalize Bedi, Belson, Jones expert declarations and redactions
Brian Umpleire	10/18/2023	0.40	\$925.00	\$370.00	finalize motion for leave to file motion for certification of subclasses, citations; finalize Flores, Schroyer, and Kennedy expert declarations and redactions and forward to co-counsel for filing
Brian Umpleire	10/20/2023	0.40	\$925.00	\$370.00	phone call with J. Thornton and D. Marks re strategy and next steps post filing of motion for leave to file motion for certification of subclasses - staffing expert declarations and any further discovery
Brian Umpleire	10/20/2023	0.20	\$925.00	\$185.00	email to M. Johnson re any further expert discovery
Brian Umpleire	10/20/2023	0.60	\$925.00	\$555.00	review Defendants' motion/strike request for certification of subclasses and expert declarations and phone call with G. Wallace re same
Brian Umpleire	10/20/2023	0.50	\$925.00	\$462.50	phone call with G. Wallace re Defendants' motions to strike request for certification of subclasses and expert declarations
Kathryn Stehner	10/24/2023	1.30	\$1,300.00	\$1,690.00	review Defendants' opposition and supporting declarations in opposition to certification of subclasses
Kathryn Stehner	10/24/2023	0.40	\$1,300.00	\$520.00	meet with B. Umpleire re Defendants' filings in opposition to motion for leave for subclasses including motions to strike and for sanctions
Brian Umpleire	10/24/2023	2.30	\$925.00	\$2,150.00	outline opposition to motion to strike re expert for subclasses and review CMC transcripts re same
Brian Umpleire	10/24/2023	0.90	\$925.00	\$832.50	review Defendants' motion for sanctions and to shorten time
Brian Umpleire	10/24/2023	3.10	\$925.00	\$2,867.50	legal research/case cites re motion to strike and renewed motion for certification of subclasses and legal standard re same
Brian Umpleire	10/24/2023	0.20	\$925.00	\$185.00	phone call with J. Johnson re staffing expert discovery production
Brian Umpleire	10/24/2023	0.20	\$925.00	\$185.00	review B. Bien-Kahn email response re under seal filings
Brian Umpleire	10/25/2023	0.40	\$925.00	\$370.00	review correspondence re sealing confidential information in motion for certification of subclasses filing
Brian Umpleire	10/26/2023	1.70	\$925.00	\$1,572.50	review and edits to opposition to administrative motion to shorten briefing schedule and forward same to M. Johnson
Brian Umpleire	10/26/2023	0.40	\$925.00	\$370.00	review correspondence re stipulation on motion to shorten time and email to M. Johnson re same
Brian Umpleire	10/27/2023	0.30	\$925.00	\$277.50	phone call with J. Thornton re task time analysis and documents produced by Brookdale in discovery re same, if any
Brian Umpleire	10/28/2023	4.00	\$925.00	\$3,700.00	draft opposition to motion to strike - expert sections
Brian Umpleire	10/29/2023	7.30	\$925.00	\$6,762.50	draft opposition to motion to strike - expert sections and procedural history
Brian Umpleire	10/30/2023	0.50	\$925.00	\$462.50	phone call with J. Thornton re expert discovery productions - content and timing
Brian Umpleire	10/31/2023	4.10	\$925.00	\$3,792.50	draft opposition to motion to strike - expert sections and procedural history
Brian Umpleire	11/1/2023	6.50	\$925.00	\$6,012.50	Draft opposition to motion to strike - experts section
Brian Umpleire	11/1/2023	0.20	\$925.00	\$185.00	phone call with G. Wallace re draft opposition to motion to strike - substance and further edits
Brian Umpleire	11/2/2023	0.40	\$925.00	\$370.00	review draft opposition to motion to strike portions of Plaintiff's motion for leave to file motion for certification of subclasses
Brian Umpleire	11/2/2023	0.50	\$925.00	\$462.50	phone call with G. Wallace re further edits to draft opposition to motion to strike
Brian Umpleire	11/2/2023	4.00	\$925.00	\$3,700.00	further edits to draft opposition to motion to strike
Brian Umpleire	11/4/2023	1.50	\$925.00	\$1,387.50	draft opposition to motion to strike re sealing confidential information
Brian Umpleire	11/6/2023	0.80	\$925.00	\$740.00	team Zoom re status and plan for today's filing
Kathryn Stehner	11/6/2023	0.30	\$925.00	\$277.50	email correspondence with B. Bien-Kahn re redactions/under seal filings
Brian Umpleire	11/6/2023	0.80	\$925.00	\$740.00	emails with J. Byrnes, M. Johnson, and J. Thornton re Jones' Bedi declaration re Jones' analysis, re Defendants' motion to strike
Kathryn Stehner	11/7/2023	1.20	\$1,300.00	\$1,560.00	review operative draft of opposition to motion to strike and discussion with B. Umpleire re staffing experts with regard to same
Brian Umpleire	11/7/2023	0.50	\$1,300.00	\$650.00	discussion with B. Umpleire re operative draft of opposition to motion to strike re staffing experts
Brian Umpleire	11/7/2023	0.80	\$925.00	\$740.00	emails and phone calls with J. Thornton and M. Johnson re timing and contents of various staffing expert related productions to answer queries from defense counsel
Brian Umpleire	11/8/2023	0.20	\$925.00	\$185.00	review Defendants' motion for certification of subclasses
Brian Umpleire	11/8/2023	2.00	\$925.00	\$1,850.00	review Defendants' opposition for motion for leave to move for subclasses and supporting Saad and Jacobson declarations
Kathryn Stehner	11/10/2023	0.80	\$1,300.00	\$1,040.00	review Defendants' opposition to motion for leave for subclasses
Brian Umpleire	11/10/2023	0.70	\$925.00	\$647.50	team call re opposition to motion for leave reply - strategy to address their case theory and discovery related dispute; attorney declarations re same
Kathryn Stehner	11/13/2023	0.40	\$1,300.00	\$650.00	meet with B. Umpleire re strategy on Reply to address Defendants' class certification opposition and impact of expert discovery related dispute
Brian Umpleire	11/13/2023	0.30	\$925.00	\$277.50	email to M. Johnson and G. Wallace re Stehner firm insert for draft Local Rule 7.1.1 filing
Brian Umpleire	11/14/2023	0.60	\$925.00	\$555.00	GoToMeeting with M. Johnson and J. Thornton expert data/document production history
Brian Umpleire	11/14/2023	0.40	\$925.00	\$370.00	phone call with G. Wallace re motion for leave to file motion for subclasses and supporting Umpleire declaration
Brian Umpleire	11/14/2023	0.50	\$925.00	\$462.50	emails and phone calls with J. Thornton, D. Wallace, and M. Johnson re contents of 396 GB of expert related data produced to Defendants by Plaintiff's experts
Brian Umpleire	11/15/2023	0.70	\$925.00	\$647.50	email and phone calls with J. Thornton re defense expert Saad declarations and responses to same and relation to further Jones declaration edits
Brian Umpleire	11/15/2023	2.70	\$925.00	\$2,497.50	further edits to draft Jones declaration and circulate to M. Johnson and G. Wallace for comments
Brian Umpleire	11/15/2023	0.50	\$925.00	\$462.50	phone call with M. Johnson re responses to claims re defense expert Saad's class certification related declarations
Brian Umpleire	11/16/2023	7.50	\$925.00	\$6,937.50	draft Umpleire declaration in support of reply supporting motion for leave to file motion for subclasses
Brian Umpleire	11/16/2023	0.70	\$925.00	\$647.50	team call re status/strategy on reply supporting motion for leave to file motion for subclasses
Brian Umpleire	11/16/2023	0.50	\$925.00	\$462.50	call with J. Thornton re expert data/document production history
Brian Umpleire	11/17/2023	0.70	\$925.00	\$647.50	review and comment re further edits to Jones declaration supporting motion for subclasses from J. Thornton; forward same to M. Johnson and G. Wallace
Brian Umpleire	11/17/2023	3.30	\$925.00	\$3,052.50	further edits to Umpleire declaration in support of motion for leave for subclasses; forward to M. Johnson for comment
Brian Umpleire	11/17/2023	5.60	\$925.00	\$5,180.00	legal research and draft insert for section on community/governance of fraud subclasses in motion for certification of subclasses; forward same to G. Wallace
Brian Umpleire	11/19/2023	0.40	\$925.00	\$370.00	further edits to Umpleire declaration in support of motion for certification of subclasses re discovery chronology; emails and phone calls with M. Johnson, G. Wallace, and J. Byrnes re same
Brian Umpleire	11/20/2023	1.30	\$925.00	\$1,202.50	review email/revised cites to reply in support of motion for certification of subclasses; forward same to G. Wallace
Brian Umpleire	11/22/2023	2.00	\$925.00	\$1,850.00	email correspondence with G. Wallace re Brookdale representations regarding the community fee and record evidence of same, re certification of subclasses
Brian Umpleire	11/22/2023	1.80	\$925.00	\$1,665.00	review Brookdale deposition transcripts for employee testimony re community fee
Brian Umpleire	11/22/2023	1.10	\$925.00	\$1,017.50	email correspondence with M. Johnson and G. Wallace re motion to compel staffing formula
Kathryn Stehner	12/1/2023	0.50	\$1,300.00	\$650.00	discussion with B. Umpleire re Umpleire declaration in support of motion for leave and motion to strike attorney declarations; proposed edits to same
Brian Umpleire	12/1/2023	2.00	\$925.00</		

Brian Umpleire	1/17/2024	0.30	\$925.00	\$277.50	review correspondence re supplemental discovery responses and tasks
Brian Umpleire	1/24/2024	0.50	\$925.00	\$462.50	phone call with G. Wallace re assessment and related data necessary for staffing analysis data in hand; email to J. Thornton and D. Marks requesting meeting re same
Brian Umpleire	1/24/2024	0.50	\$925.00	\$462.50	Zoom with M. Johnson, G. Wallace and J. Thornton re draft analysis data on hand
Kathryn Stehner	1/30/2024	0.30	\$1,300.00	\$390.00	discussion with B. Umpleire re subclasses certification hearing and preparation for same
Brian Umpleire	1/30/2024	6.80	\$925.00	\$6,290.00	draft discovery letter brief and supporting declaration re production of missing assessment and other staffing-related data; emails with M. Johnson re same
Brian Umpleire	1/30/2024	1.50	\$925.00	\$1,387.50	meet session by Zoom in preparation for subclasses certification hearing
Kathryn Stehner	1/30/2024	0.20	\$1,300.00	\$260.00	Email correspondence with B. Umpleire re staffing analysis data sufficiency
Brian Umpleire	1/31/2024	3.40	\$925.00	\$3,145.00	further edits to discovery letter brief re staffing-related data; emails with M. Johnson re same; forward to defense for inclusion of their portion
Brian Umpleire	1/31/2024	0.30	\$925.00	\$277.50	email correspondence with G. Wallace re number of disabled residents per facility re numerosity analysis
Brian Umpleire	2/1/2024	3.40	\$925.00	\$2,775.00	attend hearing re motion for leave to file motion for subclasses and to strike attorney declarations - ND Cal, Oakland
Kathryn Stehner	2/2/2024	0.40	\$1,300.00	\$520.00	meet with B. Umpleire re results of hearing on motion for leave to file motion for subclasses and to strike attorney declarations
Brian Umpleire	2/2/2024	0.70	\$925.00	\$647.50	Team strategy meeting re outstanding and potential further motions to compel
Brian Umpleire	2/2/2024	0.40	\$925.00	\$370.00	Meeting with K. Stehner re results of hearing on motion for leave to file motion for subclasses and to strike attorney declarations
Brian Umpleire	2/2/2024	1.10	\$925.00	\$820.00	Meeting with M. Johnson and J. Thornton re missing data needed for staffing analysis, benchmark formula
Brian Umpleire	2/2/2024	0.40	\$1,300.00	\$520.00	Phone call with B. Umpleire re plan for renewing motion for certification of subclasses, scope of case/cases
Brian Umpleire	2/7/2024	4.00	\$925.00	\$3,700.00	Call with M. Johnson re benchmark staffing formula motion to compel letter brief and edits re same
Brian Umpleire	2/7/2024	0.40	\$925.00	\$370.00	Phone call with K. Stehner re plan for renewing motion for certification of subclasses, scope of case/cases
Brian Umpleire	2/8/2024	0.30	\$925.00	\$277.50	Email correspondence with Dr. Kennedy re status of class certification and resubmission of Kennedy declaration in support of same
Brian Umpleire	2/8/2024	2.50	\$925.00	\$2,312.50	Edits to Kennedy class cert declaration to conform to new motion for subclasses; forward same to G. Wallace for review and comment
Brian Umpleire	2/8/2024	0.20	\$925.00	\$185.00	Forward revised draft of Plaintiff's expert Kennedy subclasses declaration to Dr. Kennedy for review
Brian Umpleire	2/9/2024	0.40	\$925.00	\$370.00	Phone call with M. Johnson re Plaintiff's expert Schroyer's materials and analysis, re regarding discovery motion for staffing formula
Brian Umpleire	2/9/2024	0.20	\$925.00	\$185.00	Email correspondence with J. Yellin re Plaintiff's expert Kennedy's subclasses declaration
Brian Umpleire	2/9/2024	0.10	\$925.00	\$92.50	Email proposed/draft claim form to Dr. Kennedy
Brian Umpleire	2/9/2024	0.80	\$925.00	\$822.50	Emails and phone calls and Zoom with B. Wallace on Kennedy subclasses declaration; bring to trial
Kathryn Stehner	2/26/2024	0.50	\$1,300.00	\$650.00	Discuss staffing analysis results with B. Umpleire re connection with motion for subclasses and plan for moving to compel additional data
Brian Umpleire	2/26/2024	0.60	\$925.00	\$555.00	Zoom among G. Wallace, M. Johnson, D. Marks, and J. Thornton re staffing analysis
Brian Umpleire	3/1/2024	1.50	\$925.00	\$1,387.50	Draft email letter to defense addressing Brookdale's failure to produce remaining assessment data; circulate to team for review and comment
Kathryn Stehner	3/1/2024	0.20	\$1,300.00	\$260.00	Discuss B. Umpleire's document review reports and responses to defense
Brian Umpleire	3/9/2024	0.40	\$925.00	\$370.00	Emails among team regarding ability/competency of witness with dementia diagnosis to testify
Brian Umpleire	3/11/2024	0.30	\$925.00	\$277.50	Phone call with G. Wallace re meet and confer letter proposing compromise position on production of assessment/staffing data
Brian Umpleire	3/19/2024	2.20	\$925.00	\$2,205.00	Draft letter to counsel proposing approach to deal with assessment data issues; forward to G. Wallace, M. Johnson for comment
Brian Umpleire	3/19/2024	4.10	\$925.00	\$92.50	Revise assessment data proposal letter and send to defense
Brian Umpleire	3/20/2024	0.30	\$925.00	\$277.50	Review Defendants' motion for sanctions for unnotified "inspection"; email to M. Johnson re same
Brian Umpleire	3/22/2024	0.40	\$925.00	\$370.00	Phone call with G. Wallace re Rule 26 expert reports for staffing experts; email to D. Marks and J. Thornton re same
Brian Umpleire	3/22/2024	0.30	\$925.00	\$282.50	Email to G. Wallace re high-level thoughts on substance of Flores Rule 26 expert report
Brian Umpleire	3/23/2024	0.40	\$925.00	\$370.00	Email to GW re Flores Rule 26 expert report / contents
Kathryn Stehner	3/24/2024	0.30	\$1,300.00	\$390.00	Review B. Umpleire memo high-level thoughts on staffing expert Rule 26 report contents
Brian Umpleire	3/25/2024	0.30	\$925.00	\$277.50	Email to G. Wallace, J. Thornton, D. Marks, M. Johnson re coordinating on staffing-related expert reports and scheduling call re same
Brian Umpleire	4/1/2024	0.40	\$925.00	\$370.00	Phone call with J. Thornton re Flores Rule 26 expert report contents and materials needed for review
Brian Umpleire	4/2/2024	0.20	\$925.00	\$185.00	Emails with G. Wallace re Flores Rule 26 report and compilation of same
Brian Umpleire	4/4/2024	0.40	\$925.00	\$370.00	Email to R. Steyer re compiling materials for Dr. Flores to review in connection with her Rule 26 expert report
Brian Umpleire	4/4/2024	0.30	\$925.00	\$277.50	Emails with G. Wallace and R. Steyer re materials needed for review regarding Flores Rule 26 expert
Brian Umpleire	4/5/2024	0.30	\$925.00	\$277.50	Email correspondence with G. Wallace and M. Johnson re newly produced contract labor data
Brian Umpleire	4/9/2024	2.50	\$925.00	\$2,312.50	Conference call with M. Johnson, G. Wallace, J. Thornton re contract labor data
Brian Umpleire	4/9/2024	0.50	\$925.00	\$462.50	Emails and phone call with J. Thornton re time periods for staffing analysis, by facility
Brian Umpleire	4/9/2024	1.30	\$925.00	\$1,202.50	Emails and phone calls with M. Johnson and J. Thornton re accounting for contract labor in staffing analysis
Brian Umpleire	4/9/2024	1.50	\$925.00	\$1,387.50	Zoom with J. Thornton, G. Wallace, and M. Johnson re record evidence of contract labor, LDRs
Brian Umpleire	4/9/2024	5.50	\$925.00	\$5,087.50	Draft outlines of Flores and Schroyer Rule 26 expert reports; forward same to J. Thornton for review and comment
Brian Umpleire	4/9/2024	0.20	\$925.00	\$185.00	Forward to J. Thornton materials compiled by Dr. Steyer re anecdotal evidence of long wait times / pending responses, re Flores Rule 26 expert
Kathryn Stehner	4/9/2024	\$1,300.00	\$650.00	\$650.00	Review correspondence re contract labor data issues and impact on staffing analysis, status of staffing-related Rule 26 expert reports
Brian Umpleire	4/9/2024	5.00	\$925.00	\$4,625.00	Outline of draft Flores Rule 26 expert report and draft report; forward same to J. Thornton for review and comment
Brian Umpleire	4/9/2024	4.80	\$925.00	\$4,440.00	Draft expert reports - Flores, Schroyer; phone calls with G. Wallace and J. Thornton re same
Brian Umpleire	4/9/2024	0.40	\$925.00	\$370.00	Phone calls with G. Wallace re Flores and Schroyer draft Rule 26 expert reports
Brian Umpleire	4/9/2024	1.70	\$925.00	\$925.00	Phone calls with J. Thornton re Flores and Schroyer draft Rule 26 expert reports
Brian Umpleire	4/10/2024	0.30	\$925.00	\$277.50	Forward Brookdale's "personal rights acknowledgment" form to G. Wallace
Brian Umpleire	4/10/2024	2.00	\$925.00	\$1,850.00	Draft supplemental interrogatory response re damages/barriers for Plaintiff Schmidt
Brian Umpleire	4/10/2024	4.10	\$925.00	\$4,182.50	Email correspondence and telephone calls with G. Wallace and J. Thornton re contract labor productions and relevance to staffing analysis conclusions; research re same
Brian Umpleire	4/10/2024	5.00	\$925.00	\$4,625.00	Draft Schroyer's Rule 26 report; forward to J. Thornton for review and comment
Brian Umpleire	4/10/2024	5.00	\$925.00	\$4,625.00	Further edits to Flores Rule 26 expert report; forward to J. Thornton for review and comment
Brian Umpleire	4/10/2024	3.80	\$925.00	\$3,487.50	Further edits to staffing-related expert reports and research re questions re accuracy G. Wallace related thereto
Brian Umpleire	4/17/2024	0.50	\$925.00	\$462.50	Zoom with G. Wallace, P. Kennedy, J. Pettie re Kennedy Rule 26 expert report
Brian Umpleire	4/17/2024	0.60	\$925.00	\$555.00	Edits / citations to staffing-related expert reports; emails and phone calls with J. Thornton re same
Brian Umpleire	4/18/2024	1.50	\$925.00	\$1,387.50	Call with J. Thornton re Flores, Schroyer, Belson Rule 26 report drafts and pro hac vice application in ND Cal
Brian Umpleire	4/18/2024	0.30	\$925.00	\$282.50	Call with G. Wallace re use of core logs and references to Flores' Rule 26 expert re same and upcoming potential tasks
Brian Umpleire	4/18/2024	0.60	\$925.00	\$555.00	Legal research re caregiver training regulations/Title 22 and email to G. Wallace re same
Brian Umpleire	4/18/2024	4.50	\$925.00	\$4,162.50	Further edits to Flores Rule 26 expert report
Brian Umpleire	4/18/2024	0.30	\$925.00	\$282.50	Review ADL documentation requirements, case log/draft log, re Flores rebuttal opinions on staffing
Kathryn Stehner	4/18/2024	0.40	\$1,300.00	\$520.00	Meet with B. Umpleire re status of staffing expert Rule 26 reports, Title 22 caregiver training regulations, and ADL documentation requirements
Brian Umpleire	4/18/2024	0.40	\$925.00	\$370.00	Meeting with K. Stehner re status of staffing expert Rule 26 reports, Title 22 caregiver training regulations, and ADL documentation requirements
Brian Umpleire	4/19/2024	0.50	\$925.00	\$462.50	Zoom with P. Kennedy, J. Pettie, G. Wallace, and R. Steyer re Kennedy Rule 26 report
Brian Umpleire	4/19/2024	1.00	\$925.00	\$925.00	Team zoom - status on discovery negotiations, deposition/schedule, and Plaintiff's motion for summary judgment
Brian Umpleire	4/22/2024	0.30	\$925.00	\$277.50	Emails with B. Ben-Khan re Flores support for understaffing referenced in Rule 26 report and DSS citations
Brian Umpleire	4/22/2024	0.40	\$925.00	\$370.00	Discussion with G. Wallace re Flores Rule 26 report contents
Brian Umpleire	4/24/2024	0.50	\$925.00	\$462.50	Email correspondence with B. Ben-Khan and J. Thornton re DSS citations
Brian Umpleire	4/24/2024	0.40	\$925.00	\$370.00	Review revised Jones Rule 26 report; emails and phone call with J. Thornton re same
Brian Umpleire	4/26/2024	3.40	\$925.00	\$3,145.00	Complete list of Plaintiff's staffing expert materials and production dates for same re expert production/discovery cutoff
Brian Umpleire	4/27/2024	6.30	\$925.00	\$5,827.50	Draft staffing expert Rule 26 reports - communications with G. Wallace and J. Thornton re same and further edits based thereon and work with B. Bonner and J. Thornton on data appendices compilation
Brian Umpleire	4/28/2024	0.60	\$925.00	\$555.00	Correspondence with R. Bonner re data for staffing expert report appendices
Brian Umpleire	4/28/2024	1.70	\$925.00	\$1,572.50	Phone calls with G. Wallace and J. Thornton re Flores Rule 26 expert report and further edits to same based thereon
Brian Umpleire	4/29/2024	0.60	\$925.00	\$555.00	Correspondence with R. Bonner re data for staffing expert report appendices
Brian Umpleire	4/29/2024	2.00	\$925.00	\$1,850.00	Email and telephone communications with G. Wallace and J. Thornton re Flores Rule 26 expert report and further edits to same
Brian Umpleire	4/29/2024	0.30	\$925.00	\$277.50	Forward defense experts Saad and Allen expert reports to J. Thornton
Brian Umpleire	4/30/2024	0.70	\$925.00	\$647.50	Correspondence with H. Fisher (Schmidt conservator) re supplemental ROG response and verification and highlight pertinent paragraphs
Brian Umpleire	4/30/2024	6.00	\$925.00	\$5,550.00	Draft staffing expert Rule 26 reports and data appendices; email and telephone communications with G. Wallace and J. Thornton and R. Bonner re same
Brian Umpleire	4/30/2024	0.40	\$925.00	\$370.00	Email correspondence with H. Fisher (Schmidt conservator) re supplemental interrogatory response (re barriers/damages) and verification
Kathryn Stehner	5/1/2024	1.50	\$1,300.00	\$1,950.00	Finalize and serve staffing experts' (Flores, Schroyer, Belson, Jones) Rule 26 reports; communications with JT, Thornton, G. Wallace, and M. Johnson re same
Brian Umpleire	5/1/2024	4.00	\$925.00	\$3,700.00	Finalize and serve Plaintiff's Schmidt's Further Supplemental Interrogatory responses on Defendants
Brian Umpleire	5/1/2024	0.80	\$925.00	\$740.00	Team zoom re discovery orders, case schedule, trial preparation, and review for summary judgment
Brian Umpleire	5/1/2024	0.70	\$925.00	\$647.50	Telephone call with B. Thornton re defense expert Saad expert report, contract labor claims, rebuttal, and expert deposition schedule
Brian Umpleire	5/7/2024	1.30	\$925.00	\$1,202.50	Telephone call with J. Thornton, G. Wallace, M. Johnson re defense expert Saad expert report and contract labor rebuttal
Brian Umpleire	5/8/2024	0.30	\$925.00	\$282.50	Review defense expert Saad expert report and notes re same
Kathryn Stehner	5/8/2024	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire to discuss Defendants' staffing-related expert reports
Brian Umpleire	5/8/2024	0.50	\$925.00	\$462.50	Review and comment re J. Thornton email re contract labor / Saad rebuttal
Brian Umpleire	5/8/2024	0.40	\$925.00	\$370.00	Email to J. Thornton re defense expert Saad impact on Plaintiff's expert Jones' analysis re LDR and need for rebuttal, if any
Brian Umpleire	5/9/2024	1.00	\$925.00	\$925.00	Review defense expert Allen Rule 26 report and compile notes for Flores rebuttal report
Kathryn Stehner	5/9/2024	1.50	\$1,300.00	\$1,950.00	Review defense expert Josh Allen Rule 26 Report
Brian Umpleire	5/9/2024	0.40	\$925.00	\$370.00	Forward defense expert Saad expert report materials to P. Kennedy for review
Brian Umpleire	5/9/2024	2.50	\$925.00	\$2,312.50	Review defense expert Allen report and compile notes for Flores rebuttal
Kathryn Stehner	5/10/2024	1.00	\$1,300.00	\$1,390.00	Discussion with K. Gaudin re defense expert Allen
Brian Umpleire	5/10/2024	1.00	\$1,300.00	\$1,390.00	Meet with B. Umpleire re Allen (HN) expert report and Flores' responses
Brian Umpleire	5/10/2024	1.30	\$925.00	\$1,202.50	Team call - experts, depositions, class definition updates
Brian Umpleire	5/13/2024	0.30	\$925.00	\$277.50	Review J. Thornton email re Flores expert production materials
Brian Umpleire	5/13/2024	0.40	\$925.00	\$370.00	Telephone call with G. Wallace re defense expert Allen and Plaintiff's expert Flores depositions and case schedule
Brian Umpleire	5/13/2024	0.80	\$925.00	\$740.00	Facsimile/document research re Brookdale's clinical service department in relation to nursing expert Allen and provision of medical services
Kathryn Stehner	5/14/2024	0.60	\$1,300.00	\$780.00	Review opposition to motion for subclasses
Brian Umpleire	5/14/2024	1.00	\$925.00	\$925.00	Telephone call with J. Thornton re Flores expert report and rebuttal items
Brian Umpleire	5/14/2024	0.40	\$925.00	\$370.00	Telephone call with G. Wallace re Flores expert report, opposition to motion for certification of subclasses, and Flores rebuttal items
Brian Umpleire	5/14/2024	1.00	\$925.00	\$925.00	Review opposition to motion for certification of subclasses; notes re same
Brian Umpleire	5/15/2024	1.30	\$925.00	\$1,202.50	Further edits to draft Flores expert rebuttal report
Brian Umpleire	5/16/2024	1.00	\$925.00	\$925.00	Draft Flores expert rebuttal report
Brian Umpleire	5/16/2024	0.50	\$925.00	\$462.50	Telephone call with J. Thornton re "current roster" data and relevance to Flores Rule 26 expert reports
Brian Umpleire	5/17/2024	3.70	\$925.00	\$3,422.50	Draft memo re defense expert Saad's numerosity analysis and Flores response
Kathryn Stehner	5/17/2024	1.80	\$1,300.00	\$1,140.00	Meet with B. Umpleire re opposition to motion for subclasses and reply and assisted living/elder facts and arguments
Brian Umpleire	5/17/2024	0.60	\$925.00	\$555.00	Legal research re timing of Rule 26 expert rebuttal disclosures
Brian Umpleire	5/17/2024	0.30	\$925.00	\$277.50	Telephone call with J. Thornton re Flores expert rebuttal report draft and follow up items
Brian Umpleire	5/17/2024	1.30	\$925.00	\$1,202.50	Team call re strategy, status, pretrial tasks
Brian Umpleire	5/17/2024	0.40	\$925.00	\$370.00	Draft Flores rebuttal report / sworn declaration
Brian Umpleire	5/17/2024	0.40	\$925.00	\$370.00	Emails with J. Thornton re expert deposition schedule
Brian Umpleire	5/19/2024	2.50	\$925.00	\$2,312.50	Draft Flores expert rebuttal report
Brian Umpleire	5/19/2024	2.50	\$925.00	\$2,312.50	Draft Flores expert rebuttal report
Brian Umpleire	5/20/2024	1.30	\$925.00	\$1,202.50	Telephone call with J. Thornton re Flores expert rebuttal report
Brian Umpleire	5/20/2024	0.80	\$925.00	\$740.00	Further edits to Flores expert rebuttal report based on phone call with J. Thornton
Brian Umpleire	5/21/2024	0.60	\$925.00	\$555.00	Telephone call with G. Wallace re regulations concerning "bedroom" status; legal research and email to G. Wallace re same - re "medical facility" within meaning of ADA
Kathryn Stehner	5/24/2024	1.00	\$925.00	\$925.00	Meet with B. Umpleire re plan for staffing expert rebuttal reports
Brian Umpleire	5/24/2024	1.00	\$925.00	\$925.00	Team call - strategy, schedule, re motion for reconsideration
Brian Umpleire	5/24/2024	1.00	\$925.00	\$925.00	Citation for reply re fluctuating needs requirements due to aging including review of experts Flores and Saad materials - re "medical facility" within meaning of ADA
Kathryn Stehner	5/24/2024	1.00	\$1,300.00	\$1,390.00	Meet with B. Umpleire re strategy/production re staffing formula; email to M. Johnson re same; draft insert for discovery letter brief re production of Brookdale's staffing formula
Brian Umpleire	5/31/2024	0.70	\$925.00	\$647.50	Review Flores expert report for necessary reductions and perform same
Brian Umpleire	5/31/2024	0.50	\$925.00	\$462.50	Review operative draft of reply in support of motion for certification of subclasses; email comments to G. Wallace re same
Brian Umpleire	6/1/2024	1.00	\$925.00	\$925.00	Review new draft of reply in support of motion for subclasses; correspondence to team re same
Kathryn Stehner	6/1/2024	0.50	\$1,300.00	\$650.00	Review operative draft of reply in support of motion for subclasses
Brian Umpleire	6/3/2024	0.60	\$925.00	\$555.00	Review operative draft of reply in support of motion for certification of subclasses to prepare for discussion among co-counsel re same
Brian Umpleire	6/3/2024	0.40	\$925.00	\$370.00	Team call re status draft reply in support of motion for certification of subclasses
Brian Umpleire	6/3/2024	1.00	\$925.00	\$925.00	Telephone call with G. Wallace re Brookdale's Homet, numerosity, and % accessible units
Brian Umpleire	6/3/2024	0.70	\$925.00	\$647.50	Citations for average length of resident stay at Brookdale for subclasses reply; emails and phone calls with G. Wallace re same
Brian Umpleire	6/4/2024	0.50	\$925.00	\$462.50	Edits to subclasses reply re Flores expert opinions; email to G. Wallace re same
Brian Umpleire	6/4/2024	1.00	\$925.00	\$925.00	Review final draft of reply re Plaintiff's expert Flores expert opinions - accuracy and citations
Brian Umpleire	6/10/2024	1.50	\$925.00	\$1,387.50	Email to G. Wallace re resident rights "advocacy representative" and review/comments on motion for sanctions
Brian Umpleire	6/13/2024	1.20	\$925.00	\$1,110.00	Review current draft of opposition to motion for sanctions; comment re same to team
Brian Umpleire	6/13/2024	1.00	\$925.00	\$925.00	Review and comments to latest draft of opposition to motion for sanctions; phone call with G. Wallace re same
Brian Umpleire	6/13/2024	0.50	\$925.00	\$462.50	Telephone conversation with J. Thornton re expert depositions and schedule and trial
Brian Umpleire	6/19/2024	0.30	\$925.00	\$277.50	Email to J. Thornton, G. Wallace re depositions of Plaintiff's experts and possible schedule
Brian Umpleire	6/21/2024	1.00	\$925.00	\$925.00	Team call - all elements of open class certification questions
Brian Umpleire	6/24/2024	0.80	\$925.00	\$740.00	Email to G. Wallace re Flores class certification declarations - reduced / unrecorded information in public domain
Brian Umpleire	6/25/2024	2.00	\$925.00	\$1,850.00	Telephone call

Brian Umpleire	7/17/2024	2.50	\$925.00	\$2,312.50	Review key staffing related Brookdale documents for selection for Flores deposition preparation; email to M. Johnson, J. Thornton, G. Wallace re same
Brian Umpleire	7/17/2024	0.30	\$925.00	\$277.50	Email communications with M. Johnson and J. Thornton re Flores depo prep document coordination
Brian Umpleire	7/17/2024	0.60	\$925.00	\$555.00	Review letter brief re categories of contractual discovery; email to M. Johnson re determining arbitration status and defense expert Saad's testimony re same
Brian Umpleire	7/17/2024	0.20	\$925.00	\$185.00	Emails with J. Thornton, M. Johnson, G. Wallace re supplemental Schroyer declaration or report
Brian Umpleire	7/17/2024	0.30	\$925.00	\$277.50	Forward proposed edit to M. Johnson re discovery letter seeking to compel production of Brookdale's staffing formula
Brian Umpleire	7/17/2024	6.50	\$925.00	\$6,012.50	In-person Flores deposition preparation with J. Thornton, C. Flores
Brian Umpleire	7/18/2024	8.00	\$925.00	\$7,400.00	In-person Flores deposition preparation with J. Thornton, C. Flores
Kathryn Stebner	7/18/2024	2.00	\$1,300.00	\$2,600.00	Meet with B. Umpleire, C. Flores, and J. Thornton re staffing expert Flores depo prep
Brian Umpleire	7/18/2024	9.00	\$925.00	\$8,325.00	In-person Flores deposition preparation with J. Thornton, C. Flores, including Zoom with G. Wallace re same
Kathryn Stebner	7/18/2024	0.60	\$1,300.00	\$780.00	Meet with B. Umpleire re staffing expert Flores deposition preparation
Brian Umpleire	7/18/2024	0.40	\$925.00	\$370.00	Review text of supplemental Flores expert opinions; emails with J. Thornton re same
Brian Umpleire	7/18/2024	8.00	\$925.00	\$7,400.00	In-person Flores deposition preparation with J. Thornton, C. Flores, including Zoom with G. Wallace.
Kathryn Stebner	7/17/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re staffing expert Flores depo prep
Brian Umpleire	7/17/2024	0.30	\$925.00	\$277.50	Emails to M. Johnson, G. Wallace, J. Thornton re Schroyer supplemental report and production
Brian Umpleire	7/17/2024	0.10	\$925.00	\$92.50	Email correspondence with counsel re Zoom link for Flores deposition
Brian Umpleire	7/17/2024	0.20	\$925.00	\$185.00	Email to M. Johnson re Flores deposition and contract labor and recent production of invoices
Brian Umpleire	7/17/2024	0.20	\$925.00	\$185.00	Serve Schroyer supplemental expert report and link to related production
Brian Umpleire	7/17/2024	0.10	\$925.00	\$92.50	Email correspondence with counsel re Flores deposition start time
Brian Umpleire	7/17/2024	5.50	\$925.00	\$5,087.50	In-person Flores deposition preparation with J. Thornton, C. Flores
Brian Umpleire	7/17/2024	0.30	\$925.00	\$277.50	Email correspondence with G. Wallace re Flores testimony on numerosity
Brian Umpleire	7/18/2024	9.00	\$925.00	\$8,325.00	Deposition of Cristina Flores, RN, PhD
Kathryn Stebner	7/18/2024	1.20	\$1,300.00	\$1,560.00	Meet with B. Umpleire re outcome of staffing expert Flores depo and next steps
Brian Umpleire	7/18/2024	0.20	\$925.00	\$185.00	Email to J. Thornton re potential depositions of Plaintiff's experts Jones and Iedson
Kathryn Stebner	7/22/2024	1.00	\$1,300.00	\$1,300.00	Review order granting in part and denying in part motion for certification of subclasses
Brian Umpleire	7/22/2024	2.00	\$925.00	\$1,850.00	Review order granting in part and denying in part motion for certification of subclasses
Brian Umpleire	7/22/2024	0.30	\$925.00	\$277.50	Email correspondence with J. Thornton and team re subclasses order
Brian Umpleire	7/22/2024	0.30	\$925.00	\$277.50	Email to K. Stebner summarizing important points in subclasses certification order
Brian Umpleire	7/22/2024	1.30	\$925.00	\$1,202.50	Summary highlights of Flores deposition testimony; forward with rough transcript to team
Brian Umpleire	7/22/2024	0.20	\$925.00	\$185.00	Email to M. Johnson with available dates for deposition of defense expert Josh Allen
Brian Umpleire	7/22/2024	0.30	\$925.00	\$277.50	Forward named plaintiff depo transcripts to J. Thornton re Rubin deposition preparation
Kathryn Stebner	7/22/2024	0.70	\$1,300.00	\$910.00	Meet with B. Umpleire re subclasses certification order
Brian Umpleire	7/22/2024	0.30	\$925.00	\$277.50	Email to J. Thornton listing documents produced in discovery relevant to the Rubin deposition / preparation
Brian Umpleire	7/22/2024	0.70	\$925.00	\$647.50	Meeting with K. Stebner re certification of subclasses order
Kathryn Stebner	7/26/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re defense expert Allen deposition preparation - strategy
Brian Umpleire	7/26/2024	1.70	\$925.00	\$1,572.50	Complete and send email to J. Thornton including links to service alignment production
Brian Umpleire	7/26/2024	0.40	\$925.00	\$370.00	Email correspondence with J. Thornton re service alignment document production and documents relevant to Rubin deposition preparation
Brian Umpleire	7/29/2024	1.00	\$925.00	\$925.00	Background research re service alignment terms used in Brookdale documents; email to J. Thornton re same - Rubin deposition preparation
Brian Umpleire	7/29/2024	0.20	\$925.00	\$185.00	Email correspondence with team re Resident Service Detail Sheets - Rubin deposition preparation
Brian Umpleire	7/29/2024	1.20	\$925.00	\$1,102.50	Forward to M. Johnson briefing re opinion understanding insight re disclosure of putative class member information for same issue in this case
Brian Umpleire	7/31/2024	0.20	\$925.00	\$185.00	Review email summary of Rubin deposition; email to J. Thornton re same
Brian Umpleire	8/6/2024	2.50	\$925.00	\$2,312.50	Review Saad, Schroyer, and Flores expert reports and declarations re numerosity and proof of same; email and phone call with G. Wallace re same
Brian Umpleire	8/7/2024	1.50	\$925.00	\$1,387.50	Email correspondence with G. Wallace re defense expert Saad opinions to be addressed by Plaintiff's expert rebuttal
Brian Umpleire	8/7/2024	4.20	\$925.00	\$3,885.00	Complete spreadsheet of Executive Director turnover in relation to average % variance from benchmark, re Plaintiff's expert rebuttal reports
Kathryn Stebner	8/8/2024	0.30	\$1,300.00	\$390.00	Discussion with B. Umpleire re Defendants' motion to decertify (b)(2) class
Brian Umpleire	8/8/2024	0.30	\$925.00	\$277.50	Email to M. Johnson re Plaintiff's experts rebuttal points to defense experts Saad and Allen
Brian Umpleire	8/9/2024	0.30	\$925.00	\$277.50	Review Defendants' motion to decertify (b)(2) class
Brian Umpleire	8/9/2024	5.70	\$925.00	\$5,272.50	Draft Flores supplemental rebuttal report; forward to J. Thornton for review and comment
Brian Umpleire	8/12/2024	2.30	\$925.00	\$2,127.50	Telephone call and emails with J. Thornton re defense expert Saad opinions/criticisms re Executive Directors and contract labor time considerations in Plaintiff's experts' analysis
Brian Umpleire	8/12/2024	1.50	\$925.00	\$1,387.50	Email correspondence with J. Thornton re periods of readiness for each named plaintiff and % variance from benchmark within those periods; further analysis re same - re Plaintiff's experts rebuttal reports
Brian Umpleire	8/12/2024	0.30	\$925.00	\$277.50	Review J. Thornton draft of Flores supplemental rebuttal report further edits and request for comments
Brian Umpleire	8/12/2024	0.40	\$925.00	\$370.00	Forward draft Flores supplemental expert rebuttal reports to G. Wallace for review and comment; telephone call re same
Brian Umpleire	8/13/2024	0.30	\$925.00	\$277.50	Emails with G. Wallace re Flores supplemental expert rebuttal report and labor benchmarks
Brian Umpleire	8/14/2024	0.30	\$925.00	\$277.50	Email to G. Wallace with version of Flores supplemental expert rebuttal report and document production related to same
Brian Umpleire	8/14/2024	0.10	\$925.00	\$92.50	Email correspondence with G. Wallace re Flores supplemental expert rebuttal report and understanding charts contained therein
Brian Umpleire	8/15/2024	3.50	\$925.00	\$3,237.50	Analysis of contract labor data, including LDR reports and newly produced invoices - re rebuttal to defense expert Saad's criticisms
Brian Umpleire	8/15/2024	0.30	\$925.00	\$277.50	Email and highline conversations with G. Wallace and J. Thornton re analysis of contract labor data produced by Brookdale
Brian Umpleire	8/15/2024	0.30	\$925.00	\$277.50	Serve Flores supplemental expert rebuttal report on Defendants
Brian Umpleire	8/21/2024	0.10	\$925.00	\$92.50	Email correspondence with G. Wallace, M. Johnson re expert depositions and schedule
Brian Umpleire	8/23/2024	0.30	\$925.00	\$277.50	Arrange court reporter for deposition of defense expert Josh Allen
Brian Umpleire	8/23/2024	0.40	\$925.00	\$370.00	Draft deposition notice for defense expert Josh Allen
Brian Umpleire	8/23/2024	0.20	\$925.00	\$185.00	Email correspondence with C. Flores, G. Wallace re meeting to discuss nature of assisted living and services provided therein
Brian Umpleire	8/27/2024	0.30	\$925.00	\$277.50	Email correspondence with M. Johnson re Zoom with expert Dr. Flores to discuss / prepare for deposition of defense expert Josh Allen
Brian Umpleire	8/28/2024	0.30	\$925.00	\$277.50	Serve Josh Allen deposition notice
Brian Umpleire	8/28/2024	1.20	\$925.00	\$1,102.50	Zoom with G. Wallace, M. Johnson, J. Thornton re prepare for deposition of defense expert Josh Allen
Brian Umpleire	8/28/2024	8.80	\$925.00	\$8,140.00	Josh Allen deposition preparation - compile pertinent regulations re provision of medical type care, restricted/therapeutic health conditions and incorporate into deposition outline
Kathryn Stebner	8/29/2024	0.80	\$1,300.00	\$1,040.00	Discussion with B. Umpleire re strategy for deposition of Josh Allen (RN)
Brian Umpleire	8/29/2024	8.50	\$925.00	\$7,862.50	Josh Allen deposition preparation - compile/draft outline and prepare exhibits
Brian Umpleire	8/29/2024	0.10	\$925.00	\$92.50	Email to team re expert deposition coverage for defense expert Baird
Brian Umpleire	8/30/2024	0.40	\$925.00	\$370.00	Email correspondence with M. Johnson re defenses expert Saad opinions mischaracterizing Plaintiff's expert Flores' testimony
Brian Umpleire	8/31/2024	6.70	\$925.00	\$6,197.50	Josh Allen deposition preparation - complete/draft outline and prepare exhibits
Brian Umpleire	9/1/2024	4.20	\$925.00	\$3,885.00	Josh Allen deposition preparation - finalize outline and forward same to G. Wallace, M. Johnson for review and comment
Kathryn Stebner	9/2/2024	0.50	\$1,300.00	\$650.00	Review draft Allen deposition outline, discuss same with B. Umpleire
Kathryn Stebner	9/2/2024	1.10	\$1,300.00	\$1,430.00	Discuss latest draft of Allen deposition outline with B. Umpleire
Brian Umpleire	9/2/2024	0.50	\$925.00	\$462.50	Phone call with G. Wallace re Allen deposition outline
Brian Umpleire	9/2/2024	3.70	\$925.00	\$3,422.50	Further edits to Allen deposition outline and compile exhibits and potential exhibits, based on conversation with G. Wallace re same
Brian Umpleire	9/2/2024	2.50	\$925.00	\$2,312.50	Draft B. Umpleire declaration in support of opposition to motion to decertify re facts concerning Defendants' claim that upwards 70% of the subclasses are former residents; forward same to J. Thornton for comment
Kathryn Stebner	9/3/2024	0.50	\$1,300.00	\$650.00	Review revised draft Allen deposition outline
Kathryn Stebner	9/3/2024	1.50	\$1,300.00	\$1,950.00	Discussed Allen depo outline and deposition strategy with B. Umpleire, KG
Brian Umpleire	9/3/2024	0.70	\$925.00	\$647.50	Further edits to B. Umpleire declaration in support of opposition to motion to decertify; forward to G. Wallace, J. Thornton for review and comment
Brian Umpleire	9/3/2024	0.40	\$925.00	\$370.00	Email to J. Thornton re defense expert Saad's numerosity analysis and supporting data
Brian Umpleire	9/3/2024	2.00	\$925.00	\$1,850.00	Review defense expert Saad's database used for numerosity analysis
Brian Umpleire	9/3/2024	0.50	\$925.00	\$462.50	Critiques to decertify re opposition to motion to decertify; forward to co-counsel
Brian Umpleire	9/3/2024	6.50	\$925.00	\$6,012.50	Josh Allen deposition preparation - further edits to outline / exhibits based on discussion with K. Stebner and K. Guadagni re same
Brian Umpleire	9/3/2024	0.40	\$925.00	\$370.00	Review Allen contract and discussion with K. Caven re same
Brian Umpleire	9/3/2024	1.20	\$925.00	\$1,102.50	Further edits to B. Umpleire declaration in support of opposition to motion to decertify; based on G. Wallace comments and respond to G. Wallace
Brian Umpleire	9/3/2024	0.60	\$925.00	\$555.00	Review final version of opposition to motion to decertify and Umpleire declaration; email sign off to co-counsel
Brian Umpleire	9/4/2024	5.50	\$925.00	\$5,087.50	Deposition of defense expert Josh Allen
Brian Umpleire	9/4/2024	0.80	\$925.00	\$740.00	Summary notes of Josh Allen deposition
Brian Umpleire	9/4/2024	0.40	\$925.00	\$370.00	Phone call with G. Wallace re Josh Allen deposition
Kathryn Stebner	9/5/2024	1.70	\$1,300.00	\$2,210.00	Discussion with B. Umpleire re Allen depo on B4
Brian Umpleire	9/5/2024	0.20	\$925.00	\$185.00	Email correspondence with M. Johnson re defense expert Baird deposition coverage
Brian Umpleire	9/5/2024	1.50	\$925.00	\$1,387.50	Email to M. Johnson re defense expert Baird deposition and potential questions for same
Kathryn Stebner	9/7/2024	0.30	\$1,300.00	\$390.00	Discussion with B. Umpleire re coverage of Julie Baird (RN) depo
Brian Umpleire	9/7/2024	1.70	\$925.00	\$1,572.50	Email correspondence with M. Johnson re additional potential questions for defense expert Saad deposition re residents without assessed needs
Brian Umpleire	9/8/2024	0.30	\$925.00	\$277.50	Email correspondence with M. Johnson re G. Wallace re defense expert Saad deposition topics
Brian Umpleire	9/8/2024	0.30	\$925.00	\$277.50	Review invoices re most-recent depots of Dr. Flores and email to G. Grunfeld re same
Kathryn Stebner	9/10/2024	1.10	\$1,300.00	\$1,430.00	Meet with B. Umpleire re Baird deposition strategy post-Allen deposition
Brian Umpleire	9/10/2024	0.20	\$925.00	\$185.00	Email with M. Johnson re defense expert Baird deposition schedule/dates
Brian Umpleire	9/10/2024	0.30	\$925.00	\$277.50	Review Saad deposition outline and email to M. Johnson with comments re same
Kathryn Stebner	9/11/2024	7.00	\$1,300.00	\$910.00	Review draft Baird deposition outline
Brian Umpleire	9/11/2024	6.00	\$925.00	\$5,550.00	Remote deposition of defense expert Saad including emails to M. Johnson with possible follow up questions
Brian Umpleire	9/11/2024	0.40	\$925.00	\$370.00	Review draft of reply to support of request for order certifying issue for appeal and comments to G. Wallace re same
Brian Umpleire	9/11/2024	0.80	\$925.00	\$740.00	Decertification / summary judgment hearing preparation - emails and phone calls with J. Thornton and B. Peters re class lists and data sufficient to determine class members status
Brian Umpleire	9/12/2024	2.50	\$925.00	\$2,312.50	Decertification / summary judgment hearing preparation - emails and phone calls with J. Thornton and B. Peters re class lists and data sufficient to determine class members status
Brian Umpleire	9/12/2024	2.50	\$925.00	\$2,312.50	Decertification / summary judgment hearing preparation - email correspondence with G. Wallace, M. Johnson, J. Thornton re universe of assessment data produced to date
Brian Umpleire	9/17/2024	0.80	\$925.00	\$740.00	Draft deposition notice for defense expert Baird and work with S. Green to obtain court reporter
Brian Umpleire	9/17/2024	0.20	\$925.00	\$185.00	Serve deposition notice for defense expert Baird
Brian Umpleire	9/17/2024	0.40	\$925.00	\$370.00	Email to G. Wallace re resident ID issues contained in Rutter declaration supporting Defendants' motion to decertify
Brian Umpleire	9/17/2024	2.00	\$925.00	\$1,850.00	Draft memo re Brookdale's claim it provided information necessary to match the unique resident IDs used in the anonymous assessment data produced to P's with the actual names of the residents from the 6 subject facilities whose claims are not subject to arbitration.
Brian Umpleire	9/18/2024	7.50	\$925.00	\$6,937.50	Review memo re Brookdale's claim it provided information necessary to match the unique resident IDs used in the anonymous assessment data produced to P's with the actual names of the residents from the 6 subject facilities whose claims are not subject to arbitration.
Brian Umpleire	9/18/2024	1.50	\$925.00	\$1,387.50	Emails with R. Steyer re previous productions of resident information rebuttal Rutter decertification declaration claims re numerosity and numerosity-related data
Brian Umpleire	9/19/2024	0.80	\$925.00	\$740.00	Decertification / summary judgment hearing preparation - emails with J. Thornton re production of daily census data re numerosity and PSP class list
Brian Umpleire	9/19/2024	2.50	\$925.00	\$2,312.50	Decertification / summary judgment hearing preparation - emails and phone calls with G. Wallace re production of daily census data re numerosity and PSP class list
Brian Umpleire	9/19/2024	0.40	\$925.00	\$370.00	Decertification / summary judgment hearing preparation - meet with R. Bonner to determine time periods for which B4 produced assessment data, per facility
Brian Umpleire	9/19/2024	3.30	\$925.00	\$3,052.50	Decertification / summary judgment hearing preparation - emails with G. Wallace re support (legal/factual) for re decertification, summary judgment
Kathryn Stebner	9/19/2024	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire re class decertification hearing
Brian Umpleire	9/19/2024	0.30	\$925.00	\$277.50	Decertification / summary judgment hearing preparation - telephone call with J. Thornton, B. Peters re resident IDs contained in assessment data produced in discovery
Brian Umpleire	9/19/2024	0.30	\$925.00	\$277.50	Decertification / summary judgment hearing preparation - telephone call with G. Wallace re numerosity evidence
Brian Umpleire	9/19/2024	0.60	\$925.00	\$555.00	Travel to decertification hearing (ND Cal, Oakland)
Brian Umpleire	9/19/2024	0.30	\$925.00	\$277.50	Decertification hearing preparation with G. Wallace
Brian Umpleire	9/19/2024	0.50	\$925.00	\$462.50	Decertification hearing (ND Cal, Judge Gilliom)
Brian Umpleire	9/19/2024	0.40	\$925.00	\$370.00	Meet/discuss with G. Wallace, G. Grunfeld, J. Yellin post-decertification hearing re status, schedule, Dauberts
Brian Umpleire	9/20/2024	1.00	\$925.00	\$925.00	Team call - re post-hearing tasks and strategy
Kathryn Stebner	9/20/2024	0.40	\$1,300.00	\$520.00	Review revised Baird depo outline
Kathryn Stebner	9/20/2024	0.60	\$1,300.00	\$780.00	Discussion with B. Umpleire, K. Guadagni re revised Baird deposition outline
Brian Umpleire	9/20/2024	0.80	\$925.00	\$740.00	Email to Plaintiff's expert Flores re defense expert Baird expert report and deposition
Brian Umpleire	9/20/2024	0.30	\$925.00	\$277.50	Discussion with K. Stebner re defense expert Baird deposition and preparation for same
Brian Umpleire	9/20/2024	0.30	\$925.00	\$277.50	Phone call with J. Thornton re defense expert Baird deposition
Brian Umpleire	9/23/2024	8.60	\$925.00	\$7,955.00	Draft deposition preparation - draft questions and outline; prepare exhibits
Brian Umpleire	9/23/2024	0.30	\$925.00	\$277.50	Email correspondence with expert C. Flores re potential questions for deposition of defense expert
Brian Umpleire	9/23/2024	0.10	\$925.00	\$92.50	Forward C. Flores' responses to questions re Baird deposition to K. Stebner and K. Guadagni for comment
Brian Umpleire	9/23/2024	0.30	\$925.00	\$277.50	Telephone call with G. Wallace re defense expert Baird deposition preparation
Kathryn Stebner	9/24/2024	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire re Baird depo on B24
Brian Umpleire	9/24/2024	1.00	\$925.00	\$925.00	Baird deposition preparation - edits draft questions and outline
Brian Umpleire	9/24/2024	4.70	\$925.00	\$4,347.50	Draft outline defense expert Allen Daubert motion / motion to exclude testimony
Brian Umpleire	9/24/2024	6.00	\$925.00	\$5,550.00	Deposition of defense expert Julie Baird
Brian Umpleire	9/24/2024	0.30	\$925.00	\$277.50	Email summary of Baird deposition highlights to G. Wallace
Brian Umpleire	9/25/2024	0.50	\$925.00	\$462.50	Team call re deposition / discovery update; updates on motions to exclude
Brian Umpleire	9/25/2024	0.50	\$925.00	\$462.50	Draft defense expert Allen Daubert motion / motion to exclude testimony
Brian Umpleire	9/26/2024	0.40	\$925.00	\$370.00	Email to G. Wallace re defense expert Allen knowledge/experience re classification of barriers
Brian Umpleire	9/26/2024	7.80	\$925.00	\$7,215.00	Draft motion to exclude certain testimony of defense expert Allen
Kathryn Stebner	9/26/2024	1.80	\$925.00	\$1,680.00	Review draft motion to exclude Allen testimony
Kathryn Stebner	9/26/2024	0.40	\$1,300.00	\$520.00	Meet with B. Umpleire re draft motion to exclude Allen expert testimony
Brian Umpleire	9/26/2024	6.50	\$925.00	\$6,012.50	Complete motion to exclude certain testimony of defense expert Allen; draft B. Umpleire declaration in support of same and prepare exhibits
Brian Umpleire	9/26/2024	1.00	\$925.00	\$925.00	File motion to exclude certain testimony of defense expert Allen and supporting papers
Brian Umpleire	9/26/2024	0.30	\$925.00	\$277.50	Further edits to motion to exclude Allen testimony based on G. Wallace comments
Brian Umpleire	9/27/2024	3.70	\$925.00	\$3,422.50	Administrative motion to file under seal portions of motion to exclude Allen testimony
Brian Umpleire	9/27/2024	1.00	\$925.00	\$925.00	Team call re summary judgment arguments
Brian Umpleire	9/27/2024	0.70	\$925.00	\$637.50	Telephone call with G. Wallace

Brian Umpleire	10/2/2024	4.60	\$925.00	\$4,255.00	Legal research re motions to exclude/Dauberts
Brian Umpleire	10/4/2024	1.00	\$925.00	\$925.00	Team call status of assignments on motions to exclude
Brian Umpleire	10/5/2024	5.20	\$925.00	\$4,210.00	Draft expert re opposition to motion to limit/exclude re experts' references to standards, legal research re same
Brian Umpleire	10/10/2024	0.40	\$925.00	\$3,70.00	Review expert deposition transcripts for confidential designations
Brian Umpleire	10/10/2024	0.10	\$925.00	\$92.50	Emails with G. Wallace re confidential designations in/of expert deposition transcripts
Brian Umpleire	10/10/2024	0.50	\$925.00	\$462.50	Motion to exclude defense expert Anderson opinions
Brian Umpleire	10/10/2024	0.30	\$925.00	\$277.50	Emails to G. Wallace re comments on draft motion to exclude options of defense expert Anderson
Brian Umpleire	10/14/2024	3.50	\$925.00	\$3,237.50	Draft reply in support of motion to exclude testimony of defense expert Allen
Brian Umpleire	10/16/2024	6.80	\$925.00	\$6,290.00	Draft reply in support of motion to exclude testimony of defense expert Allen; forward to M. Johnson, G. Wallace for review and comment
Kathryn Stebner	10/17/2024	0.50	\$1,300.00	\$650.00	Review defense draft of motion to exclude testimony of defense expert Allen
Kathryn Stebner	10/17/2024	0.40	\$1,300.00	\$520.00	Discuss operative draft of motion to exclude Allen expert testimony
Brian Umpleire	10/17/2024	3.50	\$925.00	\$3,237.50	Edits and revisions to reply in support of motion to exclude testimony of defense expert Allen
Brian Umpleire	10/17/2024	2.50	\$925.00	\$2,312.50	Review comments and edits from G. Wallace, et al and finalize reply in support of motion to exclude testimony of defense expert Allen; forward to co-counsel for filing
Kathryn Stebner	10/18/2024	1.00	\$1,300.00	\$1,300.00	Discussion with B. Umpleire re trial prep/strategy
Brian Umpleire	10/18/2024	1.70	\$925.00	\$1,572.50	Team call - trial preparation tasks/assignments
Brian Umpleire	10/18/2024	1.00	\$925.00	\$925.00	Meeting with K. Stebner re trial and trial responsibilities
Brian Umpleire	10/22/2024	0.70	\$925.00	\$1,372.50	Motion to exclude Plaintiff's expert re testimony and Defendants' reply in support of its motion on all Plaintiff's experts
Brian Umpleire	10/22/2024	6.50	\$925.00	\$6,012.50	Legal research re motions in limine for evidence tending to prejudice / cause confusion
Brian Umpleire	10/24/2024	0.30	\$925.00	\$277.50	Discussion with K. Guadagni re use of "day in the life" video at trial and use of video at trial generally - trial preparation
Brian Umpleire	10/25/2024	1.50	\$925.00	\$1,387.50	Team call - trial preparation tasks/assignments
Brian Umpleire	10/29/2024	0.20	\$925.00	\$165.00	Email to G. Grunfeld, G. Wallace re Heather Fisher's (conservator) ability to testify on behalf of Plaintiff Schmidt
Brian Umpleire	11/1/2024	1.50	\$925.00	\$1,387.50	Team call - trial preparation tasks/assignments
Brian Umpleire	11/4/2024	3.50	\$925.00	\$3,237.50	Review Heather Fisher (Schmidt conservator) deposition transcript re trial testimony preview
Brian Umpleire	11/5/2024	5.70	\$925.00	\$5,272.50	Review H. Fisher discovery responses re potential trial testimony and compile Rabbi Schmidt's encountered barriers and all evidence in record pertaining to him regarding access - trial preparation
Brian Umpleire	11/7/2024	6.50	\$925.00	\$6,012.50	Complete Plaintiff Schmidt's encountered barriers and all evidence in record pertaining to him regarding access including testimony re same - trial preparation
Brian Umpleire	11/7/2024	0.30	\$925.00	\$277.50	Telephone call with G. Wallace re Plaintiff Schmidt damages
Kathryn Stebner	11/8/2024	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire re status of pretrial activities / trial testimony
Brian Umpleire	11/8/2024	0.30	\$925.00	\$1,202.50	Team call - trial preparation tasks/assignments
Brian Umpleire	11/8/2024	0.40	\$925.00	\$444.00	Complete Plaintiff Schmidt's encountered barriers and all evidence in record pertaining to him regarding access including testimony re same - trial preparation
Brian Umpleire	11/11/2024	0.30	\$925.00	\$277.50	Email to G. Wallace re conservator testimony / hearsay
Brian Umpleire	11/11/2024	1.30	\$925.00	\$1,202.50	Conference call with J. Yelin, G. Grunfeld, G. Wallace, M. Johnson - trial preparation / strategy
Brian Umpleire	11/11/2024	0.50	\$925.00	\$462.50	Telephone call with G. Wallace re dates for intentional discrimination
Brian Umpleire	11/11/2024	0.50	\$925.00	\$4,625.00	Legal research re valuing damages for intentional discrimination
Brian Umpleire	11/11/2024	0.30	\$925.00	\$277.50	Email to H. Fisher (Schmidt conservator) re trial schedule, expectations
Kathryn Stebner	11/12/2024	1.40	\$1,300.00	\$630.00	Review notes of 11/12 CMC
Kathryn Stebner	11/12/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re CMC and motions in limine and other pretrial filings
Brian Umpleire	11/12/2024	6.00	\$925.00	\$5,550.00	Compile evidence of requests for accommodation in pretrial documents
Brian Umpleire	11/12/2024	0.40	\$925.00	\$370.00	Review J. Yelin's email notes of case management conference
Brian Umpleire	11/13/2024	0.30	\$925.00	\$277.50	Edit list of potential motions in limine in light of case management conference outcome
Brian Umpleire	11/13/2024	1.00	\$925.00	\$925.00	Team call - next steps following case management conference
Brian Umpleire	11/13/2024	5.70	\$925.00	\$5,272.50	Draft motion in limine seeking to exclude evidence of class member conduct as excuse
Brian Umpleire	11/14/2024	5.70	\$925.00	\$6,197.50	Draft motion in limine seeking to exclude evidence of class member conduct as excuse
Brian Umpleire	11/14/2024	0.40	\$925.00	\$370.00	Edits to Plaintiff expert Kennedy's supplemental expert report
Brian Umpleire	11/15/2024	4.00	\$925.00	\$3,700.00	Draft motion in limine seeking to exclude evidence of class member conduct as excuse
Brian Umpleire	11/15/2024	1.00	\$925.00	\$925.00	Team call re exchange and timing of pretrial submissions
Brian Umpleire	11/15/2024	0.30	\$925.00	\$462.50	Telephone call with G. Grunfeld re K. Fisher (Schmidt conservator) and trial, anticipated testimony
Brian Umpleire	11/15/2024	0.40	\$925.00	\$3,700.00	Compile materials relating to Plaintiff's expert Dr. Flores for 11/19 exchange with defense, including exhibit list
Brian Umpleire	11/15/2024	0.30	\$925.00	\$277.50	Telephone call with H. Fisher (Schmidt conservator) re trial
Brian Umpleire	11/17/2024	2.30	\$925.00	\$1,850.00	Send J. Yelin list of documents to be added to exhibit list relevant to testimony from Dr. Flores
Brian Umpleire	11/18/2024	1.40	\$925.00	\$1,250.00	Complete Flores documents appearing on exhibit list and e-mail to D. Edmanson
Brian Umpleire	11/18/2024	1.00	\$925.00	\$925.00	Call with counsel re status of pretrial filings and stipulated facts
Kathryn Stebner	11/18/2024	0.40	\$1,300.00	\$520.00	Meet with B. Umpleire re call with defense re pretrial filings, stipulated facts
Brian Umpleire	11/18/2024	0.40	\$925.00	\$370.00	Legal research re documentation required of successors to deceased class members in settlement context
Brian Umpleire	11/18/2024	0.30	\$925.00	\$277.50	Further email correspondence with co-counsel re Flores-related trial exhibits
Brian Umpleire	11/18/2024	3.80	\$925.00	\$3,515.00	Legal research re viability of defense argument that providing assistance to overcome barriers deplete ADA liability
Kathryn Stebner	11/20/2024	0.80	\$1,300.00	\$1,040.00	Review draft motions in limine re classmember conduct, providing assistance
Brian Umpleire	11/20/2024	3.30	\$925.00	\$2,777.50	Email correspondence with G. Wallace re relevance of anticipated Swast testimony to disabilities, scoping
Brian Umpleire	11/20/2024	1.00	\$925.00	\$925.00	Team call - motions in limine, depo designations, exhibit and witness lists
Brian Umpleire	11/20/2024	0.50	\$925.00	\$462.50	Review and edit Plaintiff's list of motions in limine in anticipation of meet and confer with defense tomorrow
Kathryn Stebner	11/20/2024	1.30	\$1,300.00	\$1,590.00	Meet with B. Umpleire re motions in limine re negotiations with counsel re same
Brian Umpleire	11/21/2024	0.70	\$925.00	\$647.50	Edits to motion in limine to exclude evidence of class member conduct as excuse - add section on customizations
Brian Umpleire	11/21/2024	1.30	\$925.00	\$1,202.50	Meeting with K. Stebner re motions in limine and negotiations with counsel re same
Brian Umpleire	11/24/2024	1.00	\$925.00	\$925.00	Further edits to draft of motion in limine to exclude evidence of class member conduct as excuse; forward to G. Wallace for review and comment
Brian Umpleire	11/24/2024	0.40	\$925.00	\$555.00	Telephone call with G. Wallace re jury vs bench trial
Kathryn Stebner	11/25/2024	0.40	\$1,300.00	\$925.00	Discussion with B. Umpleire re jury vs bench trial
Brian Umpleire	11/25/2024	1.00	\$925.00	\$925.00	Zoom with defense re motions in limine, time estimates
Brian Umpleire	11/25/2024	0.50	\$925.00	\$5,180.00	Finalize motion in limine seeking to exclude evidence of class member conduct as excuse incorporating G. Wallace edits
Brian Umpleire	11/25/2024	0.30	\$925.00	\$277.50	Telephone call with K. Stebner re jury vs. bench trial
Brian Umpleire	11/26/2024	2.10	\$925.00	\$1,842.50	Review Defendants' objections, counterdesignations, and exhibits
Kathryn Stebner	11/27/2024	1.10	\$1,300.00	\$1,430.00	Review Defendants' motions in limine
Brian Umpleire	11/27/2024	0.80	\$1,300.00	\$1,040.00	Discuss Defendants' motions in limine and proposed responses with B. Umpleire
Brian Umpleire	11/27/2024	0.50	\$925.00	\$462.50	Team Zoom - status of pretrial projects and assignments
Brian Umpleire	11/27/2024	5.50	\$925.00	\$5,087.50	Review Defendants' motions in limine; notes/outline responses to 1 and 2
Kathryn Stebner	11/28/2024	0.70	\$1,300.00	\$910.00	Phone calls with B. Umpleire re jury vs bench trial
Kathryn Stebner	11/28/2024	0.40	\$1,300.00	\$650.00	Zoom with B. Umpleire, Grunfeld, Yelin, Wallace, Johnson re jury vs bench trial
Brian Umpleire	11/28/2024	0.70	\$925.00	\$647.50	Phone calls with K. Stebner re jury vs bench trial
Brian Umpleire	11/29/2024	0.50	\$925.00	\$462.50	Zoom among J. Yelin, G. Grunfeld, K. Stebner, G. Wallace, M. Johnson re bench vs. jury trial
Brian Umpleire	12/1/2024	10.00	\$925.00	\$9,250.00	Draft opposition to Defendants' motion in limine re Martin/Waters supplemental expert reports
Brian Umpleire	12/2/2024	12.50	\$925.00	\$11,562.50	Draft opposition to Defendants' motion in limine re 2017 letters from Plaintiff's counsel
Kathryn Stebner	12/2/2024	0.60	\$1,300.00	\$780.00	Review final drafts of Plaintiff's oppositions to Defendants' motions in limine
Kathryn Stebner	12/2/2024	0.30	\$1,300.00	\$390.00	Discuss final drafts of Plaintiff's oppositions to Defendants' motions in limine with B. Umpleire
Brian Umpleire	12/2/2024	3.00	\$925.00	\$2,775.00	Finalize opposition to Defendants' motion in limine re 2017 letters, including exhibits, and forward to co-counsel for filing
Brian Umpleire	12/3/2024	7.50	\$925.00	\$6,937.50	Finalize opposition to Defendants' motion in limine re Martin and Waters supplemental expert reports, including exhibits and forward to co-counsel for filing
Brian Umpleire	12/4/2024	2.00	\$925.00	\$1,850.00	Review Defendants' oppositions to Plaintiff's motions in limine
Kathryn Stebner	12/4/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpleire re results of and confer with Defendants re pretrial issues
Brian Umpleire	12/5/2024	1.00	\$925.00	\$925.00	Meet and confer with Defendants re pretrial issues
Brian Umpleire	12/9/2024	0.50	\$925.00	\$462.50	Team after-call to discuss results of meet and confer with Defendants re pretrial issues
Brian Umpleire	12/9/2024	2.80	\$925.00	\$2,682.50	Review latest iteration of jury instructions and case authorities re intentional discrimination
Brian Umpleire	12/9/2024	0.10	\$925.00	\$462.50	Team call - pretrial matters including mock trial and jury vs. bench
Brian Umpleire	12/12/2024	0.40	\$925.00	\$370.00	Review Flores expert reports re numerosity figures
Brian Umpleire	12/12/2024	0.10	\$925.00	\$92.50	Email to G. Wallace re Flores testimony on numerosity
Brian Umpleire	12/12/2024	0.40	\$925.00	\$370.00	Telephone call with G. Wallace re pretrial issues
Brian Umpleire	12/12/2024	2.80	\$925.00	\$2,590.00	Review defense expert Allen's deposition transcript and pull excerpts re lack of knowledge re ADA, access, barriers, forward same to G. Wallace
Kathryn Stebner	12/13/2024	1.50	\$1,300.00	\$1,950.00	Review orders on motions for summary judgment
Kathryn Stebner	12/13/2024	0.70	\$1,300.00	\$910.00	Review B. Umpleire email re orders on motions for summary judgment and discuss impact for case going forward
Brian Umpleire	12/13/2024	2.80	\$925.00	\$1,850.00	Review orders on motions for summary judgment; email to K. Stebner summarizing same and re import for case going forward
Brian Umpleire	12/13/2024	0.70	\$925.00	\$647.50	Meet with K. Stebner re orders on motions for summary judgment and impact on case
Brian Umpleire	12/14/2024	9.00	\$925.00	\$8,325.00	Mock trial
Brian Umpleire	12/14/2024	0.40	\$925.00	\$370.00	Email to G. Wallace re summary thoughts on mock trial
Kathryn Stebner	12/16/2024	1.50	\$1,300.00	\$1,950.00	Discuss mock trial results with B. Umpleire - trial strategy
Brian Umpleire	12/16/2024	5.70	\$925.00	\$5,272.50	Prepare for pretrial conference - compile and review pretrial statements, trial brief, prepare to argue motions in limine
Brian Umpleire	12/16/2024	0.40	\$925.00	\$370.00	Telephone call with G. Wallace re motions in limine and arguments re same
Kathryn Stebner	12/17/2024	0.50	\$1,300.00	\$650.00	Receive updates from B. Umpleire on results of 12/17 pretrial conference
Brian Umpleire	12/17/2024	3.00	\$925.00	\$2,775.00	Pretrial conference - N.D. Cal., Judge Gilliam
Brian Umpleire	12/18/2024	2.00	\$925.00	\$1,850.00	Review draft injunction; edit to include staffing/monitoring/terms
Brian Umpleire	12/19/2024	0.40	\$925.00	\$370.00	Review email correspondence re Plaintiff Algrime (confidential)
Brian Umpleire	12/19/2024	0.50	\$925.00	\$6,112.50	Review development of Martin and Waters opinions re J. Yelin's Defendants' experts and summary judgment arguments
Kathryn Stebner	12/20/2024	1.50	\$1,300.00	\$1,950.00	Meet with B. Umpleire re staffing elements of draft injunction, pretrial statement, revised motions in limine
Brian Umpleire	12/20/2024	1.30	\$925.00	\$1,202.50	Review list of renewed motions in limine and revised witness list in advance of team meeting
Brian Umpleire	12/20/2024	1.80	\$925.00	\$650.00	Team call - revised motions in limine, revised witness list, further pretrial projects
Brian Umpleire	12/20/2024	0.80	\$925.00	\$740.00	Review pretrial statement and email to team re language concerning provision of medical care at Brookdale RCFEs
Brian Umpleire	12/20/2024	1.50	\$925.00	\$1,387.50	Meeting with K. Stebner re staffing elements of draft injunction, pretrial statement, revised motions in limine
Brian Umpleire	12/22/2024	0.80	\$925.00	\$555.00	Pretrial meet and confer with defense - motions in limine, issues for trial, jury vs. bench, resident / class list
Brian Umpleire	12/26/2024	1.00	\$925.00	\$925.00	Team call - class schedule, needed discovery, and strategizing
Brian Umpleire	12/26/2024	4.80	\$925.00	\$4,162.50	Draft revised motion in limine seeking to exclude arguments re class member conduct as an excuse and circulate to team
Brian Umpleire	12/30/2024	1.10	\$925.00	\$1,017.50	Incorporate G. Wallace edits and fill ches to motion in limine seeking to exclude arguments re class member conduct as an excuse; recirculate to team
Brian Umpleire	12/30/2024	0.30	\$925.00	\$277.50	Telephone call with G. Wallace re pretrial filings and Court's expectations about meet and conferences for trial
Brian Umpleire	12/30/2024	0.50	\$925.00	\$462.50	Review pretrial conference transcript and forward except to G. Wallace re Court's expectations about meet and conferences for trial
Brian Umpleire	12/30/2024	0.30	\$925.00	\$277.50	Review edits to revised motion in limine re class member conduct and email to J. Yelin re same
Brian Umpleire	12/30/2024	0.50	\$925.00	\$462.50	Review exhibit list and proposed objections; email to J. Yelin re same
Brian Umpleire	12/30/2024	0.30	\$925.00	\$277.50	Review G. Wallace edits to verdict form re physical or medical treatment or care
Brian Umpleire	12/30/2024	0.20	\$925.00	\$185.00	Email with G. Wallace edits to verdict form re physical or medical treatment or care
Brian Umpleire	12/31/2024	0.20	\$925.00	\$185.00	Email correspondence with co-counsel re Algrime visit to facility
Kathryn Stebner	1/2/2025	1.80	\$1,300.00	\$2,340.00	Review Defendants' motions in limine and proposed responses
Kathryn Stebner	1/2/2025	1.30	\$1,300.00	\$1,690.00	Review draft motion for bench trial
Brian Umpleire	1/2/2025	3.00	\$925.00	\$2,775.00	Review Defendants' motions in limine; outline responses/oppositions
Brian Umpleire	1/2/2025	0.40	\$925.00	\$370.00	Review motion for bench trial
Brian Umpleire	1/2/2025	0.20	\$925.00	\$165.00	Emails with G. Wallace re motion for bench trial
Brian Umpleire	1/2/2025	0.40	\$925.00	\$370.00	Review opposition to motion for Algrime's medical records
Brian Umpleire	1/2/2025	1.30	\$925.00	\$1,202.50	Review Settlement Conference papers / party statements
Brian Umpleire	1/3/2025	1.10	\$925.00	\$1,017.50	Team zoom - trial preparation and discussion of outstanding drafts of various pretrial filings
Brian Umpleire	1/3/2025	1.60	\$925.00	\$1,550.00	Review and comment on neutral statement and pretrial statement
Brian Umpleire	1/6/2025	0.40	\$925.00	\$370.00	Emails with M. Johnson re Leisure deposition and exhibits evidencing medical or physical treatment or care, including attaching exhibits used at deposition of defense expert Allen re same
Brian Umpleire	1/6/2025	2.00	\$925.00	\$1,850.00	Draft opposition to Defendants' motion in limine #2 seeking to exclude 2017 letters
Brian Umpleire	1/6/2025	0.30	\$925.00	\$165.00	Email to G. Flores re trial date and availability
Brian Umpleire	1/6/2025	4.50	\$925.00	\$4,162.50	Draft opposition to Defendants' motion in limine seeking to exclude testimony from Plaintiff's experts Martin and Waters
Brian Umpleire	1/6/2025	1.70	\$925.00	\$1,572.50	Draft opposition to Defendants' motion in limine #2 seeking to exclude 2017 letters
Brian Umpleire	1/6/2025	0.70	\$925.00	\$647.50	Team zoom re status of motions in limine/oppositions and other pretrial filings
Brian Umpleire	1/6/2025	1.10	\$925.00	\$1,387.50	Pretrial meet and confer with defense vs. Zoom
Brian Umpleire	1/7/2025	0.60	\$925.00	\$555.00	Review settlement detail sheets and related correspondence
Brian Umpleire	1/7/2025	0.80	\$925.00	\$740.00	Edits to draft opposition to Defendants' motion in limine seeking to exclude testimony from Plaintiff's experts Martin and Waters
Brian Umpleire	1/7/2025	7.50	\$925.00	\$6,937.50	Settlement Conference (Zoom, Judge Spert)
Kathryn Stebner	1/8/2025	0.80	\$1,300.00	\$1,040.00	Meet with B. Umpleire re CV/17 Settlement Conference
Kathryn Stebner	1/8/2025	0.90	\$1,300.00	\$1,170.00	Review draft pretrial statement
Kathryn Stebner	1/8/2025	0.40	\$1,300.00	\$520.00	Discuss draft pretrial statement with B. Umpleire
Brian Umpleire	1/8/2025	1.80	\$925.00	\$1,640.00	Meeting with K. Stebner re 1/7 Settlement Conference
Brian Umpleire	1/8/2025	2.00	\$925.00	\$1,850.00	Finalize oppositions to motions in limine re 2017 letters and Martin/Waters testimony and supporting declarations/exhibits; forward to co-counsel for filing
Brian Umpleire	1/8/2025	1.50	\$925.00	\$1,387.50	Review/edits to pretrial statement, jury instructions
Brian Umpleire	1/8/2025	0.40	\$925.00	\$370.00	Phone call with A. Spragel re opposition to motion in limine seeking to exclude testimony from Plaintiff's experts Martin and Waters and standing order on expert rebuttal reports
Brian Umpleire	1/8/2025	0.30	\$925.00		

Brian Umpliere	1/14/2025	0.40	\$925.00	\$370.00	Emails with R. Steyer re Christopher Gail (class declarant) deposition - preparation and background
Brian Umpliere	1/15/2025	0.30	\$925.00	\$277.50	Emails with J. Yellin, R. Steyer re Christopher Gail (class declarant) deposition scheduling
Brian Umpliere	1/15/2025	1.50	\$925.00	\$1,387.50	Draft letter for Settlement Term Sheet - staffing bullet points for reporting/monitoring requirements
Brian Umpliere	1/16/2025	0.30	\$925.00	\$277.50	Emails with J. Yellin and team re deposition scheduling, including Gail (class declarant) deposition
Brian Umpliere	1/16/2025	0.60	\$925.00	\$555.00	Zoom with J. Yellin, G. Grunfeld, G. Wallace, and M. Johnson re injunction terms
Brian Umpliere	1/16/2025	4.00	\$925.00	\$3,700.00	Christopher Gail (class declarant) deposition preparation session via Zoom
Brian Umpliere	1/16/2025	2.00	\$925.00	\$1,850.00	Further Settlement Conference with Judge Sporn (via Zoom)
Brian Umpliere	1/16/2025	0.10	\$925.00	\$92.50	Email to C. Flores re trial date
Kathryn Stebner	1/17/2025	1.20	\$1,300.00	\$1,560.00	Discussion with B. Umpliere re 1/16 Settlement Conference and proposed settlement terms
Brian Umpliere	1/17/2025	1.20	\$925.00	\$1,110.00	Discuss 1/16 Settlement Conference with K. Stebner
Kathryn Stebner	1/20/2025	0.60	\$1,300.00	\$780.00	Review edits to injunction language re staffing compliance reporting requirements
Kathryn Stebner	1/20/2025	0.30	\$1,300.00	\$390.00	Discussion with B. Umpliere re injunction language re staffing compliance reporting requirements
Brian Umpliere	1/20/2025	0.50	\$925.00	\$462.50	Review and edits to stipulated injunction; forward same to G. Wallace for review and comment
Brian Umpliere	1/20/2025	0.60	\$925.00	\$555.00	Review and edits to settlement conference statement
Brian Umpliere	1/20/2025	0.30	\$925.00	\$277.50	Email to G. Wallace re injunction language regarding reporting requirements
Kathryn Stebner	1/31/2025	0.50	\$1,300.00	\$650.00	Discuss revised settlement conference statement with B. Umpliere
Brian Umpliere	1/31/2025	0.30	\$925.00	\$277.50	Review revised settlement statement to Judge Sporn; email comments to G. Wallace re same
Brian Umpliere	1/31/2025	0.50	\$925.00	\$462.50	Discuss settlement conference statement with K. Stebner
Kathryn Stebner	2/4/2025	0.40	\$1,300.00	\$520.00	Discuss 2/4 Settlement Conference with B. Umpliere
Brian Umpliere	2/4/2025	0.40	\$925.00	\$370.00	Review further draft of settlement injunction re staffing requirements
Brian Umpliere	2/4/2025	6.50	\$925.00	\$6,012.50	Further Settlement Conference with Judge Sporn (via Zoom)
Brian Umpliere	2/4/2025	0.40	\$925.00	\$370.00	Discussion with K. Stebner re 2/4 Settlement Conference
Kathryn Stebner	2/6/2025	0.60	\$1,300.00	\$780.00	Meet with B. Umpliere re proposed settlement / injunction terms
Brian Umpliere	2/6/2025	0.50	\$925.00	\$462.50	Team Zoom re injunction, settlement terms
Brian Umpliere	2/6/2025	0.60	\$925.00	\$555.00	Meeting with K. Stebner re proposed settlement terms
Brian Umpliere	2/10/2025	0.80	\$925.00	\$740.00	Review internal team correspondence and cases cited therein re notice and (b)(2) classes
Brian Umpliere	2/12/2025	0.20	\$925.00	\$185.00	Emails with J. Yellin, G. Grunfeld, G. Wallace, and M. Johnson re preliminary approval motion
Kathryn Stebner	2/13/2025	1.50	\$1,300.00	\$1,950.00	Review motion for bench trial and opposition
Kathryn Stebner	2/13/2025	0.40	\$1,300.00	\$520.00	Meet with B. Umpliere re motion for bench trial and opposition and strategy re same
Brian Umpliere	2/13/2025	0.50	\$925.00	\$462.50	Review motion for bench trial and opposition
Brian Umpliere	2/13/2025	0.40	\$925.00	\$370.00	Discuss motion for bench trial and opposition strategy with K. Stebner
Brian Umpliere	2/14/2025	0.40	\$925.00	\$370.00	Review team emails re settlement stipulation/injunction and attorneys fees language
Brian Umpliere	2/14/2025	0.50	\$925.00	\$462.50	Team zoom re settlement agreement
Brian Umpliere	2/14/2025	0.10	\$925.00	\$92.50	Email correspondence with H. Fisher (Schmidt conservator) re settlement confidentiality
Kathryn Stebner	2/18/2025	0.50	\$1,300.00	\$650.00	Discuss with B. Umpliere results of meeting with defense on terms of long form settlement agreement
Brian Umpliere	2/18/2025	1.00	\$925.00	\$925.00	Zoom with defense re discussion of long form settlement agreement
Brian Umpliere	2/19/2025	0.60	\$925.00	\$555.00	Team Zoom following meeting with defense on long form agreement - update
Kathryn Stebner	2/20/2025	1.70	\$1,300.00	\$2,210.00	Review operative draft of settlement agreement papers
Brian Umpliere	2/20/2025	0.10	\$925.00	\$462.50	Review and edits to latest draft of settlement agreement papers and forward to J. Yellin
Kathryn Stebner	2/21/2025	0.60	\$1,300.00	\$780.00	Meet with B. Umpliere re proposed settlement terms including proposed injunctive relief
Brian Umpliere	2/21/2025	0.60	\$925.00	\$555.00	Discussion with K. Stebner re proposed settlement terms including proposed injunctive relief
Brian Umpliere	2/22/2025	0.40	\$925.00	\$370.00	Phone call with G. Wallace re class notice, final versions of settlement papers, signatures
Brian Umpliere	2/26/2025	0.10	\$925.00	\$92.50	Email to J. Yellin re participation in client meetings re settlement
Brian Umpliere	3/4/2025	0.20	\$925.00	\$185.00	Review final drafts of settlement papers
Brian Umpliere	3/5/2025	0.50	\$925.00	\$462.50	Zoom with H. Fisher (Schmidt conservator), J. Yellin and G. Grunfeld re settlement terms, explanation, questions
Kathryn Stebner	3/6/2025	0.80	\$1,300.00	\$1,040.00	Discussion with B. Umpliere re attorneys' fees and costs
Brian Umpliere	3/6/2025	0.80	\$925.00	\$740.00	Discussion with K. Stebner re attorneys fees
Brian Umpliere	3/12/2025	0.70	\$925.00	\$647.50	Email to G. Wallace re summaries of settlement terms in similar understaffing litigation re preliminary approval motion
Brian Umpliere	3/13/2025	0.40	\$925.00	\$370.00	Further review of operative draft of motion for preliminary approval; email to G. Grunfeld re same
Brian Umpliere	3/14/2025	0.50	\$925.00	\$462.50	Zoom with defense re final settlement, preliminary approval
Kathryn Stebner	4/2/2025	0.60	\$1,300.00	\$780.00	Meet with B. Umpliere re final approval
Brian Umpliere	4/2/2025	0.60	\$925.00	\$555.00	Meet with K. Stebner re final approval
Brian Umpliere	6/25/2025	0.50	\$925.00	\$462.50	Review Josh Allen deposition transcript re discussion of access barriers
Brian Umpliere	7/1/2025	4.50	\$925.00	\$4,162.50	Draft Stebner firm declaration in support of fee application
Brian Umpliere	7/2/2025	2.50	\$925.00	\$2,312.50	Draft Stebner firm declaration in support of fee application
Kathryn Stebner	7/2/2025	0.20	\$1,300.00	\$260.00	Discuss Stebner firm fee application declaration with B. Umpliere
Brian Umpliere	7/16/2025	3.30	\$925.00	\$3,052.50	Finalize Stebner firm declaration in support of fee application; forward to K. Stebner for review
Kathryn Stebner	7/12/2025	2.50	\$1,300.00	\$3,250.00	Review Stebner firm time records and fee application declaration and approve
TOTALS		3055.00		\$2,931,159.00	