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EXHIBIT A

Timekeeper Nickname 1	Transaction Da Time	Spent (optional rou Rate	Value S	lip Value	Description Case development - review cases re UCL and emailed co-counsel re same
Kelly Knapp	12/21/2016	0.90	\$925.00	\$832.50	
Kelly Knapp Kelly Knapp	12/27/2016	2.10 0.40	\$925.00 \$925.00	\$1,942.50	Case development - legal research re neglect and elder abuse and staffing 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 abstention
Kelly Knapp	1/10/2017	0.40	\$925.00	\$370.00	Case Development - conference call with possible expert Case Development - conference call with president of Family Council at Brookdale facility
Kelly Knapp	1/17/2017	1.50	\$925.00	\$1,387.50	
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	1/18/2017	2.10	\$925.00	\$1,942.50	Case Development - legal research re staffing and elder abuse
Kelly Knapp Kelly Knapp	1/26/2017	3.90 3.10	\$925.00 \$925.00	\$3,607.50 \$2,867.50	Case Development - legal research and drafted memo re injunctive relief Case Development - research re regulatory oversight
Kelly Knapp	2/1/2017 2/2/2017	1.90	\$925.00	\$1,757.50	Case Development - research relevant regulations and drafted PRA request to DSS
Kelly Knapp		0.20	\$925.00	\$185.00	Drafted PRA request, email S. Colby re same
Kelly Knapp Kelly Knapp	2/24/2017	0.10 0.30	\$925.00 \$925.00	\$92.50 \$277.50	Conference call with S. Colby re client interviews and retainer Reviewed/Artified 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 Email to co-counsel re client interviews
Kelly Knapp	3/6/2017	0.10	\$925.00	\$92.50	
Kelly Knapp	3/7/2017	0.50	\$925.00	\$462.50	Conference call with potential named plaintiff Draft memo re client interview
Kelly Knapp	3/7/2017	0.50	\$925.00	\$462.50	
Kelly Knapp	3/8/2017	0.30	\$925.00	\$277.50	Conference call with Brookdale resident re conditions at facility Draft memo re client interviews
Kelly Knapp	3/8/2017	0.20	\$925.00	\$185.00	
Kelly Knapp	3/8/2017	1.20 0.10	\$925.00 \$925.00	\$1,110.00 \$92.50	Conference call with Brookdale residents and drafted memos re same
Kelly Knapp Kelly Knapp	3/14/2017	0.60	\$925.00	\$555.00	Conference call with potential client re condtions at Brookdale facility 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 settlelement
Kelly Knapp	4/4/2017	0.20	\$925.00	\$185.00	Meet w/ K. Stebner to discuss settlement strategy Conference call with K. Stebner and co-counsel re settlement options
Kelly Knapp	4/5/2017	0.50	\$925.00	\$462.50	
Kathryn Stebner	4/5/2017	0.50	\$1,300.00	\$650.00	Conference call with K. Knapp and co-counsel re settlement options
Kelly Knapp Kelly Knapp	4/13/2017 4/13/2017	0.40	\$925.00 \$925.00	\$370.00 \$277.50	Conference call with S. Colby re ADA claims Meet with K. Stebner to prepare for settlement meeting
Kathryn Stebner Kelly Knapp	4/13/2017 4/14/2017	0.30	\$1,300.00 \$925.00	\$390.00 \$1.110.00	Meet with K. Knapp to prepare for settlement meeting 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	4/19/2017	2.70	\$925.00	\$2,497.50	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 Conference call with co-counsel and Ombudsman, and follow-up call w/ co-counsel
Kelly Knapp	4/20/2017	1.50	\$925.00	\$1.387.50	
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		\$925.00	\$370.00	Conference call with co-counsel re staffing expert
Kelly Knapp	4/24/2017 4/24/2017	0.40	\$925.00	\$370.00	Phone call with potential staffing expert, and follow-up email re same
Kathryn Stebner Kelly Knapp	4/24/2017	0.40 0.50	\$1,300.00 \$925.00	\$520.00 \$462.50	Phone call with K. Knapp and potential staffing expert 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 residnet re potential access claim. Draft letter to DSS re missing records
Kelly Knapp	4/25/2017	0.50	\$925.00	\$462.50	
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		\$925.00	\$277.50	Research on staffing plans
Kelly Knapp	4/26/2017	0.60	\$925.00 \$925.00	\$555.00 \$832.50	Conference call with consultant re staffing plans
Kelly Knapp Kathryn Stebner	4/26/2017 4/26/2017	0.90 5.00	\$1,300.00	\$6,500.00	Drafted memo to team re consultant's recommendations, reviewed consultant's articles, re staffing plans Meeting with Tim Caesar at Schneider Wallace
Kelly Knapp Kelly Knapp	4/27/2017 4/27/2017	0.10	\$925.00 \$925.00	\$92.50 \$832.50	Reviewed email from consultant re staffing standards 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 Conference call with CANHR re staffing theories
Kelly Knapp	4/28/2017	0.50	\$925.00	\$462.50	
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 Draft email to potential expert re staffing theories
Kelly Knapp	4/28/2017	0.20	\$925.00	\$185.00	
Kelly Knapp	4/28/2017	0.40	\$925.00	\$370.00	Draft memo summarizing phone interview with resident
Kelly Knapp	4/28/2017		\$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	
Kathryn Stebner	5/1/2017	1.00	\$1,300.00	\$1,300.00	Conference call with co-counsel re case strategy Conference call with co-counsel re case strategy
Kelly Knapp	5/2/2017	0.10	\$925.00	\$92.50	Emails to consultants re staffing theories Email to consultant re staffing
Kelly Knapp	5/3/2017	0.20	\$925.00	\$185.00	
Kelly Knapp	5/4/2017 5/4/2017	0.80	\$925.00 \$925.00	\$740.00 \$185.00	Conference call with consultant re staffing theories Conference call with S. Colby re staffing theories
Kelly Knapp Kelly Knapp	5/4/2017	0.20 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 Email to S. Colby re phone call with potential class representative
Kelly Knapp	5/4/2017	0.10	\$925.00	\$92.50	
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	
Kelly Knapp	5/10/2017	0.30	\$925.00	\$277.50	Email to consultant re staffing theories Legal research re PRA request
Kathryn Stebner Kelly Knapp	5/10/2017	0.50 0.10	\$1,300.00 \$925.00	\$650.00 \$92.50	Telephone call with G. Wallace and G. Grunfeld re case/claims analysis Review news articles re plans to sell Brookdale facilities
Kelly Knapp	5/15/2017	0.10	\$925.00	\$92.50	Conference call with DSS-CCL (Community Care Licensing) re PRA request
Kelly Knapp	5/15/2017	0.50	\$925.00	\$462.50	Review potential expert's published articles Draft memos re potential experts
Kelly Knapp	5/17/2017	0.30	\$925.00	\$277.50	
Kelly Knapp	5/17/2017	2.10	\$925.00	\$1,942.50	Travel to/from and meeting with co-counsel re complaint Revise memos and draft emails to co-counsel re class representative and experts
Kelly Knapp	5/18/2017	0.30	\$925.00	\$277.50	
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		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 Review article re short-staffing in Santa Cruz re similar allegations in Brookdate
Kelly Knapp	5/24/2017	0.10	\$925.00	\$92.50	
Kelly Knapp	5/24/2017	0.50	\$925.00	\$462.50	Legal research re elder abuse claim Travel to/from and meeting with potential class representative at San Ramon facility
Kelly Knapp	5/24/2017	3.00	\$925.00	\$2,775.00	
Kelly Knapp	5/25/2017	0.50	\$925.00	\$462.50	Edits/revisions to CLRA letter
Kelly Knapp	5/25/2017	2.70	\$925.00	\$2,497.50	Legal research and memo re elder abuse claim
Kelly Knapp	5/29/2017	0.90	\$925.00	\$832.50	Draft complaint
Kelly Knapp	5/30/2017	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. Grunfeld and contract, review contracts and emails
Kathryn Stebner Kelly Knapp	6/6/2017 6/12/2017	0.50	\$1,300.00 \$925.00	\$650.00 \$277.50	Call with G. Grunfeld re contract 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 6/15/2017	0.50	\$925.00 \$925.00	\$462.50	Draft letter to DSS-CCL (Community Care Licensing) re PRA request Conference call with daughter of potential class representative re fact development
Kelly Knapp Kelly Knapp	6/15/2017	0.50	\$925.00	\$462.50	Conference call with gaughter or potential class representative re fact development 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 mergers and/or acquisitions
Kelly Knapp	6/16/2017	0.70	\$925.00	\$647.50	Legal research re injunction after acquisition Legal research re acquisition
Kelly Knapp	6/16/2017	0.10	\$925.00	\$92.50	
Kelly Knapp	6/16/2017	0.80	\$925.00	\$740.00	Legal research re successor liability and injunctions
Kelly Knapp	6/18/2017	1.50	\$925.00	\$1,387.50	Legal research re successor in interest liability Draft memo re successor liability
Kelly Knapp	6/19/2017	1.10	\$925.00	\$1,017.50	
Kelly Knapp	6/19/2017	0.50	\$925.00	\$462.50	Review operative draft complaint Conference call with co-counseline emergency evacuation plan
Kelly Knapp	6/19/2017	0.10	\$925.00	\$92.50	
Kelly Knapp	6/19/2017	0.60	\$925.00	\$555.00	Memo re meeting with an co-counter re emergency evacuation pain Memo re meeting with anned plaintiff Review operative draft of complaint
Kelly Knapp	6/20/2017	0.20	\$925.00	\$185.00	Conference call with co-counsel re draft complaint status
Kelly Knapp	6/20/2017	0.30	\$925.00	\$277.50	
Kathryn Stebner Kelly Knapp	6/20/2017 6/21/2017	0.30	\$1,300.00 \$925.00	\$390.00 \$277.50	Conference call with co-counsel re draft complaint status 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 Email to team re procedural declarations for complaint
Kelly Knapp	6/26/2017	0.40	\$925.00	\$370.00	
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. Coby 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 \$1,300.00	\$4,717.50 \$520.00	Draft/edit operative draft of complaint
Kathryn Stebner Kelly Knapp	6/30/2017 7/1/2017	0.40	\$925.00	\$555.00	Emails with co-counsel re defense counsel Edit draft complaint
Kelly Knapp	7/3/2017	0.20	\$925.00	\$185.00	Email to co-counsel re operative draft complaint Travel to/from meeting with co-counsel re draft complaint
Kelly Knapp	7/5/2017	0.80	\$925.00	\$740.00	
Kelly Knapp	7/5/2017	3.00 0.40	\$925.00 \$925.00	\$2,775.00	Meeting with co-counsel re draft complaint
Kelly Knapp Kelly Knapp	7/7/2017 7/11/2017	0.20	\$925.00	\$185.00	Review memo from co-counsel re ADA fees Review operative draft complaint
Kelly Knapp	7/13/2017	0.20	\$925.00	\$185.00	Review draft complaint and email S. Colby re same Phone call with S. Colby witness re staffing and email re same
Kelly Knapp	7/13/2017	0.30	\$925.00	\$277.50	
Kelly Knapp Kelly Knapp	7/13/2017 7/13/2017	0.80	\$925.00 \$925.00	\$740.00 \$277.50	Phone call with percipient witness re staffing 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	7/25/2017	0.90	\$925.00	\$832.50	Phone call with witness re staffing and disability access Memo re phone call with percipient witness re staffing and disability access
Kelly Knapp	7/25/2017	0.40	\$925.00	\$370.00	
Kelly Knapp	7/28/2017	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 resident re dramatic rate increase
Kelly Knapp	8/4/2017	0.20	\$925.00	\$185.00	Review/comment re draft of preservation letter
Kelly Knapp	8/4/2017	2.70	\$925.00	\$2,497.50	Travel to/from meeting with co-counsel re litigation/discovery strategy Meeting with co-counsel re litigation/discovery strategy
Kelly Knapp	8/4/2017	0.50	\$925.00	\$462.50	
Kelly Knapp	8/8/2017	0.30	\$925.00	\$277.50	Investigate potential expert testimorry conducive to prayer for injunctive relief
Kelly Knapp	8/9/2017		\$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 Draft memo re putative class member interview
Kelly Knapp	8/11/2017	0.60	\$925.00	\$555.00	
Kelly Knapp	8/11/2017	0.90	\$925.00	\$832.50	Phone call with putative class member re staffing and access claims

Kelly Knapp	8/11/2017	0.20	\$925.00	\$185.00	Phone call with percipient witness re staffind at Brookstale
Kelly Knapp	8/11/2017	0.40	\$925.00	\$370.00	Email to co-counsel summarizing witness interview
Kelly Knapp Kelly Knapp	8/14/2017 8/16/2017	1.10 0.10	\$925.00 \$925.00	\$1,017.50 \$92.50	Phone call with percipient witness re staffing at Brookdate Santa Rosa Review correspondence from percipient witness re staffing at Brookdate Santa Rosa
Kelly Knapp	8/16/2017	0.20	\$925.00	\$185.00	Phone call with percipient witness re staffingat Brookdate
Kelly Knapp Kelly Knapp	8/16/2017 8/16/2017	0.10	\$925.00 \$925.00	\$92.50 \$185.00	Draft letter to percipient witness re staffing-related follow up questions Emailt 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 Kelly Knapp	8/31/2017 9/5/2017	0.20 0.10	\$925.00 \$925.00	\$185.00 \$92.50	Phone call with Brookdale resident re-staffing at facility Reviewe 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 Kelly Knapp	9/11/2017 9/11/2017	0.20 1.80	\$925.00 \$925.00	\$185.00 \$1,665.00	Prepare for meeting re experts
Kelly Knapp Kelly Knapp	9/11/2017	0.50	\$925.00	\$462.50	Travel to/from meeting with co-counsel re experts and class certification 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 Kelly Knapp	9/13/2017 9/13/2017	0.30 1.20	\$925.00 \$925.00	\$277.50 \$1.110.00	Phone call with percipient witness re staffing 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 9/14/2017	0.20	\$925.00	\$185.00	Review case law sent from S. Colby re whether declarations are discoverable
Kelly Knapp Kelly Knapp	9/14/2017 9/15/2017	0.20	\$925.00 \$925.00	\$185.00 \$740.00	Email requesting available declarations, transcripts re possible expert Conference call with Brookdale resident in Anaheim 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 Kathryn Stebner	9/19/2017 9/19/2017	1.70 0.30	\$925.00 \$1,300.00	\$1,572.50 \$390.00	Draft class certification witness declaration template 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 \$277.50	Conference call with potential staffing expert
Kelly Knapp Kathryn Stebner	9/20/2017 9/23/2017	0.30 1.40	\$925.00 \$1,300.00	\$277.50	Conference call with S. Colby re staffing expert Retrieve 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 Kelly Knapp	9/27/2017 9/29/2017	0.20 1.00	\$925.00 \$925.00	\$185.00 \$925.00	Conference call consulting expert re IHSS time-for-task 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 Kelly Knapp	9/29/2017 10/2/2017	0.40	\$1,300.00 \$925.00	\$520.00 \$555.00	Call with K. Knapp redefendants' motions (strike, dismiss, arbitrate) 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 10/2/2017	0.50	\$925.00 \$925.00	\$462.50 \$740.00	Meeting with co-counsel re defendants' motions to dismiss, strike, arbitrate Draft records request letters for potential class representatives and reviewe co-counsel's research memo re same
Kelly Knapp Kelly Knapp	10/2/2017	0.80	\$925.00	\$832.50	Drant records request letters for potential class representatives and reviewe co-counset's research memo re same 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 Kelly Knapp	10/3/2017 10/4/2017	4.10 0.70	\$925.00 \$925.00	\$3,792.50 \$647.50	Research and drafting of opposition to motion to dismiss Draft insert/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	10/5/2017	0.60	\$925.00	\$555.00	Legal research re opposition to motion to dismiss
Kelly Knapp Kelly Knapp	10/5/2017 10/5/2017	0.30	\$925.00 \$925.00	\$277.50 \$832.50	Phone call with Brookdale resident re arbitration and admission contract 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 Kathous Stehner	10/10/2017 10/10/2017	0.60	\$925.00 \$1,300.00	\$555.00 \$520.00	Legal research on preclusive effect of release of claims Call with Y. Kannar a populations to defend only 'disposition motions, whitesian strategy
Kathryn Stebner Kelly Knapp	10/10/2017	0.40	\$1,300.00 \$925.00	\$520.00 \$370.00	Call with K. Knapp re oppositions to defendants' dispositive motions, arbitration strategy 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 Kelly Knapp	10/11/2017 10/11/2017	0.20	\$925.00 \$925.00	\$185.00 \$185.00	Phone call with Chris Hu re opposition to motion to dismiss 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 Kelly Knapp	10/12/2017 10/12/2017	1.50 0.40	\$925.00 \$925.00	\$1,387.50 \$370.00	Edits/revisions to portion of opposition to motion to dismiss 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 Kelly Knapp	10/17/2017 10/17/2017	0.20	\$925.00 \$925.00	\$185.00 \$185.00	Phone call with S. Colby re opposition to motion to dismiss and fact investigation Phone call with Brookdale witness/resident re staffing and arbitration
Kelly Knapp	10/19/2017	0.90	\$925.00	\$832.50	Legal research re settlement releases, and revised opposition
Kelly Knapp	10/19/2017	0.40	\$925.00	\$370.00	Further edits to opposition to motion to dismiss re settlement releases
Kelly Knapp Kelly Knapp	10/20/2017 10/23/2017	0.60	\$925.00 \$925.00	\$555.00 \$370.00	Revisions to opposition to motion to dismiss 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 10/25/2017	0.70	\$925.00 \$1,300.00	\$647.50 \$390.00	Further revisions to opposition to motion to dismiss
Kathryn Stebner Kathryn Stebner	10/25/2017	0.30	\$1,300.00	\$390.00	Review internal emails and set meeting re briefing schedule 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 Kathryn Stebner	10/26/2017 10/26/2017	0.40	\$925.00 \$1,300.00	\$370.00 \$780.00	Phone call with S. Colby and G. Wallace re release of all claims argument 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 Kelly Knapp	10/27/2017 10/28/2017	1.30 2.10	\$925.00 \$925.00	\$1,202.50 \$1,942.50	Further revisions and edits to oppositions to motion to dismiss 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 Kelly Knapp	10/31/2017 11/2/2017	1.30 0.10	\$925.00 \$925.00	\$1,202.50 \$92.50	Edits/revisions to discrete sections of opposition to motion to dismiss 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	11/9/2017	0.20	\$925.00	\$185.00	Review operative drafts of opposition briefs and email comments to team re same
Kathryn Stebner Kelly Knapp	11/9/2017 11/16/2017	0.30	\$1,300.00 \$925.00	\$390.00 \$462.50	Review internal emails re oppositions to defendants' motions (strike, dismiss, arbitrate) and review filings Travel time to/from, and meeting w/ expert and co-counsel
Kelly Knapp	11/16/2017	2.50	\$925.00	\$2,312.50	Strategy meeting with co-counsel and expert
Kelly Knapp Kelly Knapp	12/1/2017 12/4/2017	0.20	\$925.00 \$925.00	\$185.00 \$185.00	Email to team re investigator update 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 Kelly Knapp	12/8/2017 12/12/2017	0.60	\$925.00 \$925.00	\$555.00 \$92.50	Review defendants' reply briefs supporting motions to dismiss, strike, arbitrate Review potential plaintiff's admission contract
Kelly Knapp Kelly Knapp	12/12/2017	0.10	\$925.00	\$92.50	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 Kelly Knapp	12/13/2017 12/19/2017	0.80	\$1,300.00 \$925.00	\$1,040.00 \$647.50	Conference call with team re strategy for oral argument on defendants' motions to dismiss, strike, arbitrate Conference call with team re discovery and amended complaint
Kelly Knapp Kelly Knapp	12/19/2017	0.70	\$925.00	\$277.50	Conternce cau with team re discovery and amended complaint Reviewed Schnelle 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 Kelly Knapp	12/19/2017 12/20/2017	0.30	\$925.00 \$925.00	\$277.50 \$92.50	Research on status of pending Florida case and draft email to team re same Reviewed 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 Kelly Knapp	12/21/2017 12/22/2017	2.50 0.10	\$925.00 \$925.00	\$2,312.50 \$92.50	Draft discovery requests to defendants 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 Kelly Knapp	12/26/2017 1/4/2018	2.30 0.30	\$925.00 \$925.00	\$2,127.50 \$277.50	Draft discovery requests to defendants Read/respond to emails with co-counsel relamended complaint and discovery
Kelly Knapp	1/8/2018	0.20	\$925.00	\$185.00	Legal research re expert discovery, discovery of experts
Kelly Knapp Kelly Knapp	1/8/2018 1/8/2018	0.40	\$925.00 \$925.00	\$370.00 \$185.00	Conference call plaintiff's attorney in Florida class case against Defendants
Kelly Knapp Kelly Knapp	1/8/2018	0.20	\$925.00 \$925.00	\$185.00 \$92.50	Draft email to team re discovery update/status Review and respond to email from co-counsel re arbitration
Kathryn Stebner	2/7/2018	0.30	\$1,300.00 \$1,300.00	\$390.00	Review Hagier letter
Kathryn Stebner Kathryn Stebner	2/8/2018 2/9/2018	0.30	\$1,300.00 \$1,300.00	\$390.00 \$520.00	Review letter and emails re allegations for amended complaint Review draft First Amended Complaint and comment
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 Kathryn Stebner	2/15/2018 2/20/2018	0.40	\$1,300.00 \$1,300.00	\$520.00 \$780.00	Review motion to file amended complaint and email correspondence with team re same 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 Kathryn Stebner	2/23/2018 2/23/2018	0.40	\$1,300.00 \$1,300.00	\$520.00 \$910.00	Call with G. Wallace and G. Grunfeld re draft discovery 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 Kathryn Stebner	3/2/2018 3/20/2018	0.20 2.00	\$925.00 \$1,300.00	\$185.00 \$2,600.00	Draft notice of change of counsel 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 Kathryn Stebner	3/25/2018 5/16/2018	0.20	\$1,300.00 \$1,300.00	\$260.00 \$910.00	Email to S. Cobly re draft successor in interests declaration
Kathryn Stebner Brian Umpierre	5/16/2018 5/16/2018	0.70	\$1,300.00 \$925.00	\$910.00 \$647.50	Meet with B. Umpierre re case overview / assignments Meet with K. Stebner re case overview / assignments
Brian Umpierre	5/18/2018	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 Brian Umpierre	5/29/2018 6/26/2018	0.20	\$925.00 \$925.00	\$185.00 \$740.00	Telephone call with putative class member (MC) - intake, case background and nature of class actions Conference call with co-counsel re case status, strategy, motion to strike class allegations
Kathryn Stebner	6/28/2018	1.30	\$1,300.00	\$1,690.00	Conference call with co-counsel re case status, strategy, MTS class allegations; review pleadings/emails re same.
Brian Umpierre Kathryn Stebner	7/9/2018 7/10/2018	0.30	\$925.00 \$1,300.00	\$277.50 \$910.00	Review email from S. Colby re potential document requests re complaints received from residents Review draft discoveryldocument requests
Kathryn Stebner	7/10/2018	0.30	\$1,300.00	\$390.00	Discussion with B. Umpierre re draft discovery requests
Brian Umpierre	7/10/2018	0.30	\$925.00 \$925.00	\$277.50	Case/fact development - review news article re Brookdale corporate options to break up business Discours death documents with V. Stabours
Brian Umpierre Brian Umpierre	7/10/2018 8/3/2018	0.30	\$925.00 \$925.00	\$277.50 \$370.00	Discuss draft documents requests with K. Stebner Gase/fact development - review news article re Brookdale's sale of assisted living facilities.
Kathryn Stebner	8/4/2018	0.40	\$1,300.00	\$520.00	Review news article re current Brookdale AL business status
Kathryn Stebner Brian Umpierre	8/20/2018 8/20/2018	0.80	\$1,300.00 \$925.00	\$1,040.00 \$462.50	Meet with B. Umpierre re discovery status and CCL records assignment Meet with K. Setebner re discovery status and CCL records assignment
Brian Umpierre	8/23/2018	2.50	\$925.00	\$2,312.50	Case/fact development - CCL record summaries (San Ramon, Rockridge)
Brian Umpierre Kathryn Stebner	8/24/2018 8/31/2018	5.50 0.60	\$925.00 \$1.300.00	\$5,087.50 \$780.00	Case/fact development - CCL record summary (San Ramon)
Kathryn Stebner Kathryn Stebner	9/17/2018	0.60 0.50	\$1,300.00 \$1,300.00	\$650.00	Emails with G. Kawamoto re written discovery and case schedule Meetings-communications: conference call among co-counsel re change of ownership.
Brian Umpierre	9/17/2018	0.50	\$925.00	\$462.50	Conference call among co-counsel re change of ownership
Brian Umpierre Brian Umpierre	10/15/2018 10/19/2018	1.20 0.70	\$925.00 \$925.00	\$1,110.00 \$647.50	Legal research re required elements of successor in interest declaration; emails with G. Kawamoto re same 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 Kathryn Stebner	11/6/2018 12/12/2018	0.40	\$925.00 \$1,300.00	\$370.00 \$910.00	Telephone call with putative class member / Scotts Valley resident (KC) re cases background, intake, fact development, email summary re same Meet with S. Colby re case status and strategy
Brian Umpierre	1/7/2019	0.50	\$925.00	\$462.50	Telephone call with Plaintiff Eidler re communicating with potential fact witness/current resident
Sarah Colby	1/25/2019	0.30	\$995.00	\$298.50	Review order on defendants' motions to dismiss, strike, arbitrate Emails with co-coursed and texts with clients an order on defendants' motions to dismiss, strike, and arbitrate
Sarah Colby Sarah Colby	1/25/2019 1/25/2019	0.20	\$995.00 \$995.00	\$199.00 \$696.50	Emails with co-counsel and texts with clients re order on defendants' motions to dismiss, strike, and arbitrate 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 compet arbitration and to dismiss
Kathryn Stebner Kathryn Stebner	1/25/2019 1/25/2019	0.40	\$1,300.00 \$1,300.00	\$520.00 \$650.00	Phone call with S. Colby re arbitration order and next steps 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 arbitratoin order and assignments Review order on motion to dismiss, strike, arbitrate; review stip re scheduling; research FRCP and G.O. 56 re deadlines; email G. Wallace re same
Sarah Colby	1/26/2019	0.30	\$995.00	\$298.50	

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 Sarah Colby	1/30/2019 1/30/2019	0.20	\$995.00 \$995.00	\$199.00 \$796.00	Call with G. Wallace re contacting proposed class members Conference call with S. Eidler 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 Sarah Colby	1/31/2019 2/4/2019	0.40	\$995.00 \$995.00	\$398.00 \$99.50	Phone call with proposed class member/resident's guardian ad litem and follow up email to her requesting records; draft record request letter email putative class member's guardian ad litem about meeting with putative class member
Sarah Colby	2/8/2019	0.20	\$995.00	\$199.00	Phone call with Sharon Eidler re update on Brookdale San Ramon and potential witnesses
Sarah Colby Sarah Colby	2/14/2019 2/14/2019	0.30 0.20	\$995.00 \$995.00	\$298.50 \$199.00	Phone call with J. Yellin re Third Amended Complaint Review Third Amended Complaint in advance of call with J. Yellin
Sarah Colby Kathryn Stebner	2/17/2019 2/20/2019	0.40	\$995.00 \$1,300.00	\$398.00 \$650.00	Phone call with G. Wallace re discovery / class certification plan and strategy 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 leave to amend to substitute class representatives
Brian Umpierre Sarah Colby	2/20/2019 2/25/2019	0.40 1.00	\$925.00 \$995.00	\$370.00 \$995.00	Emails with G. Kawamoto, D. Zaccharin re successor in interest declaration for deceased plaintiff's successor Conference call with Sharon Eidler 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 Brian Umpierre	3/4/2019 3/6/2019	1.00 0.70	\$925.00 \$925.00	\$925.00 \$647.50	Meeting with K. Stebner re Rule 26 report and discovery plan Review Initial Disclosures and draft motion to compel Rule 26 conference
Sarah Colby	3/8/2019	0.20	\$995.00	\$199.00	Call with G. Grunfeld re Motion to Stay and email to co-coounsel re same argument in related case
Sarah Colby Kathryn Stebner	3/8/2019 3/8/2019	0.10 0.80	\$995.00 \$1,300.00	\$99.50 \$1,040.00	Review orders and email from G. Grunfeld re motion to stay Review draft Rule 26 report
Kathryn Stebner	3/8/2019	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre re draft Rule 26 report
Brian Umpierre Brian Umpierre	3/8/2019 3/8/2019	0.60	\$925.00 \$925.00	\$555.00 \$462.50	Review order on motion to compel/stay Rule 26 conference in similar understaffing case re same issue; review magistrate judge's orders re same Meeting with K. Stebner re draft Rule 26 report
Sarah Colby Sarah Colby	3/10/2019 3/10/2019	1.10	\$995.00	\$1,094.50	Review motion to stay papers and edit opposition
Sarah Colby	3/11/2019	0.10 0.10	\$995.00 \$995.00	\$99.50 \$99.50	Email J. Yellin and G. Grunfeld re edits to opposition to motion to stay Emails with G. Grunfeld and J. Yellin re unpublished opinion and motion to stay opposition
Sarah Colby Sarah Colby	3/14/2019 3/14/2019	2.50 1.30	\$995.00 \$995.00	\$2,487.50 \$1,293.50	Meeting with Eidler and Stiner (includes drive to and from Dublin) 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 Beeler and review discovery order
Kathryn Stebner Kathryn Stebner	3/15/2019 3/15/2019	0.80	\$1,300.00 \$1,300.00	\$1,040.00 \$650.00	Review Order following CMC opening discovery and discussion with S. Colby re same 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 avialability and protocol
Brian Umpierre Brian Umpierre	3/15/2019 3/19/2019	0.40	\$925.00 \$925.00	\$370.00 \$370.00	Review order following 3/14 case management conference opening discovery and permitting rolling productions Case/fact development - review DSS report re allegations of failure to provide care services
Sarah Colby	3/24/2019 3/25/2019	0.70	\$995.00 \$995.00	\$696.50 \$99.50	Review/edit opposition to request for interlocutory appeal. Review emails from M. Johnson and G. Grunfeld re proposed protective order
Sarah Colby Sarah Colby	3/28/2019	0.10 0.50	\$995.00	\$497.50	Phone call with named Plaintiff S. Stiner re problems with morning staffing
Sarah Colby Sarah Colby	3/28/2019 3/29/2019	0.10	\$995.00 \$995.00	\$99.50 \$497.50	Emails with co-counsel re Stiner's morning staffing issues Call with G. Grunfeld and G. Wallace re class representative problems in facility
Sarah Colby	3/29/2019	0.60	\$995.00	\$597.00	Call with Sharon Eidler re Brookdale San Ramon staffing issues
Sarah Colby Sarah Colby	4/2/2019 4/4/2019	0.10	\$995.00 \$995.00	\$99.50 \$199.00	Review email: from S.Eidler with possible class declarants Further emails with S.Eidler with possible class declarants
Sarah Colby	4/4/2019	0.40	\$995.00	\$398.00	Call with S. Stiner re morning staff shortage and her call with Executive Director re same
Sarah Colby Sarah Colby	4/4/2019 4/4/2019	0.30 0.20	\$995.00 \$995.00	\$298.50 \$199.00	Call and texts with S. Eidler re class member contact with media Emails with G. Grunfeld and putative class member re media contact
Sarah Colby Sarah Colby	4/6/2019	0.10	\$995.00	\$99.50	Texts with S. Stiner re morning prep/staffing shortage
Sarah Colby	4/7/2019 4/7/2019	0.10 0.40	\$995.00 \$995.00	\$99.50 \$398.00	Texts with S. Stiner re morning prep staff shortage Call with K. Stenber re class member declarations
Kathryn Stebner Sarah Colby	4/7/2019 4/8/2019	0.40	\$1,300.00 \$995.00	\$520.00 \$99.50	Gall with S. Colby re class member declarations
Brian Umpierre	4/8/2019	0.40	\$925.00	\$370.00	Texts with S. Stiner re morning prep staffing shortage Telephone call with putative class member - intake, case background and nature of class actions; email to group re same
Sarah Colby Kathryn Stebner	4/9/2019 4/9/2019	0.20	\$995.00 \$1,300.00	\$199.00 \$260.00	Emails with G. Grunfeld, J. Yellin, G. Wallace re model class declarations Review B. Umolerre email re intake re Brookdale understaffing inquiry
Sarah Colby	4/16/2019	0.50	\$995.00	\$497.50	Call with S. Eidler re case update - motions, discovery, circumstances at Brookdale San Ramon
Sarah Colby Brian Umpierre	4/16/2019 4/16/2019	0.10	\$995.00 \$925.00	\$99.50 \$185.00	Call with S. Stiner re update on staffing issues in momings Review correspondence re press inquiries regarding case
Brian Umpierre	4/16/2019	2.00	\$925.00	\$1,850.00	Review first set of produced documents
Brian Umpierre Brian Umpierre	4/29/2019 4/29/2019	0.80	\$925.00 \$925.00	\$740.00 \$555.00	Review Defendants' responses and objections to first wave of document requests and team emails re same Review discovery response overview chart of all responses / objections, in advance of team discovery call
Kathryn Stebner	4/30/2019 4/30/2019	0.30	\$1,300.00 \$1,300.00	\$390.00	Review feam emails summarizing Defendants' responses and objections to first set of document requests Meet with B. Umplerre re Defendants' responses and objections to RPDs and actual documents produced
Kathryn Stebner Sarah Colby	5/14/2019	0.60	\$995.00	\$780.00 \$199.00	Meet with B. Umpierre re Detendants: responses and objections to APUs and actual documents produced Call with G. Wallace re status of discovery and class certification
Sarah Colby Sarah Colby	5/14/2019 5/15/2019	0.10	\$995.00 \$995.00	\$99.50 \$398.00	Research articles on Brookdate 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 Sarah Colby	5/16/2019 5/16/2019	0.40 1.00	\$995.00 \$995.00	\$398.00 \$995.00	Research DSS citations and articles on Brookdale Research for meet and confer letter re quality assurance/etc document request
Sarah Colby	5/20/2019	1.60	\$995.00	\$1,592.00	Research and review documents for meet and confer letter re quality services and operations meetings document requests
Sarah Colby Sarah Colby	5/20/2019 6/6/2019	0.30	\$995.00 \$995.00	\$298.50 \$298.50	Email to M. Johnson re research on meet and confer letter re quality services and operations meetings document requests Review order denying defendants' 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 to team industry article re Brookdate's AL business
Brian Umpierre Kathryn Stebner	6/7/2019 6/7/2019	0.20	\$925.00 \$1,300.00	\$185.00 \$390.00	Case/fact development - review industry article re Brookdale forwarded by K. Stebner Review order denying stay
Sarah Colby Sarah Colby	6/12/2019 6/12/2019	0.10 1.40	\$995.00 \$995.00	\$99.50 \$1,393.00	Call with G. Grunfeld re discovery dispute re inspecting memory care units
Sarah Colby	6/13/2019	0.10	\$995.00	\$99.50	Review and edit letter from G. Grunteld to definse re inspecting memory care units (includes research) Emails with co-counsel re site inspections
Sarah Colby Sarah Colby	6/17/2019 6/25/2019	0.20	\$995.00 \$995.00	\$199.00 \$298.50	Call with G. Wallace re class certification issues and related discovery Draft email memorandum to co-counsel summarizing call with S. Steiner and S. Eidler
Sarah Colby	6/25/2019	0.10	\$995.00	\$99.50	Emails with counsel re site visits
Sarah Colby Sarah Colby	6/25/2019 6/25/2019	0.50	\$995.00 \$995.00	\$497.50 \$895.50	Call with S. Stiner re site visits, resident survey, call with Brookdale's Cull, and further update re staffing, caregivers Call with S. Eidler re site visits, resident survey, Brookdale's Cull, discovery disputes
Sarah Colby	6/25/2019	0.40	\$995.00	\$398.00	Call with K. Stebner re class member problems with caregivers
Kathryn Stebner Brian Umpierre	6/25/2019 6/25/2019	0.40	\$1,300.00 \$925.00	\$520.00 \$185.00	Call with S. Colby re class member problems with caregivers Review email from S. Colby re meeting with S. Eidier and S. Stiner
Sarah Colby	6/26/2019	0.10	\$995.00	\$99.50	Email correspondence with co-counsel re Brookdale resident survey
Sarah Colby Sarah Colby	6/26/2019 6/28/2019	0.20	\$995.00 \$995.00	\$199.00 \$497.50	Call with S. Eidler re follow up on resident survey, site visits, FC meeting Review/edit discovery letter - research on DSS licensing requirements for inclusion in letter
Sarah Colby Sarah Colby	6/28/2019 6/28/2019	0.10	\$995.00 \$995.00	\$99.50 \$99.50	Call with G. Wallace re discovery letter edits Texts with S. Stiner re resident survey
Sarah Colby	6/28/2019	0.10	\$995.00	\$99.50	Review memo re site visit of San Pablo facility
Sarah Colby Sarah Colby	6/29/2019 7/8/2019	0.10	\$995.00 \$995.00	\$99.50	Emails with G. Wallace and T. Close re licensing documents for discovery dispute Texts with S. Stiner re updates on Brookdale San Ramon
Brian Umpierre	7/8/2019	0.40	\$925.00	\$370.00	Search Relativity 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 Sarah Colby	7/9/2019 7/9/2019	0.20 0.10	\$995.00 \$995.00	\$199.00 \$99.50	Emails with co-counsel, expert Mastin, and defense counsel re covering site inspection of Fountaingrove Email with G. Kawamoto re protective order
Sarah Colby	7/11/2019	0.10	\$995.00	\$99.50	Emails with co-counsel and expert G. Waters re scheduling additional site inspections
Brian Umpierre Sarah Colby	7/13/2019 7/18/2019	1.20 0.10	\$925.00 \$995.00	\$1,110.00 \$99.50	Review third set of produced documents Texts with S. Stiner re meeting
Sarah Colby	7/18/2019 7/23/2019	0.30	\$995.00 \$995.00	\$298.50	Review discovery letter re memory care units and emails with co-counsel re same Review/edit motion for extension for answering brief in 9th circ. arbitration appeal.
Sarah Colby Sarah Colby	7/25/2019	3.00	\$995.00	\$199.00 \$2,985.00	Meet with S. Stiner (includes travel to and from) to discuss case status/developments
Sarah Colby Sarah Colby	7/25/2019 8/1/2019	0.50 2.00	\$995.00 \$995.00	\$497.50 \$1,990.00	Travel to/from meeting with S. Stiner 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. Stiner re situation at Brookdale San Ramon
Sarah Colby Sarah Colby	8/6/2019 8/7/2019	0.20	\$995.00 \$995.00	\$199.00 \$597.00	Call with M. Johnson re subpoenas to DSS, ESI search terms, and related document requests Call with S. Eidler re update on family council meeting, bus transportation, new call pendants
Sarah Colby	8/8/2019	0.10	\$995.00	\$99.50	Texts from/to S. Stiner re situation at Brookdale San Ramon
Brian Umpierre Sarah Colby	8/12/2019 8/22/2019	0.40	\$925.00 \$995.00	\$370.00 \$99.50	Telephone call with G. Wallace, M. Johnson remechanics of propounding DSS subpoenas; email to G. Kawamoto re same Texts from/To S. Stiner re site inspection at Brookdale San Ramon and email with co-cousel re same
Sarah Colby Sarah Colby	8/23/2019 8/24/2019	0.10 0.10	\$995.00 \$995.00	\$99.50 \$99.50	Texts from/to S. Stiner re site inspections Email to/from Rita Stiner re ER evacuation procedure documentation
Sarah Colby	9/4/2019	0.10	\$995.00	\$99.50	Texts from/to S. Stiner re situation at Brookstate San Ramon
Sarah Colby Sarah Colby	9/8/2019 9/23/2019	0.10	\$995.00 \$995.00	\$99.50 \$199.00	Texts from/to S. Stiner re situation at Brookdale San Ramon Texts from/to S. Stiner re updates on Brookdale San Ramon and mediation and texts from/to S. Eldler re mediation
Kathryn Stebner	10/2/2019	0.60	\$1,300.00	\$780.00	Emails with B. Umpierre re staffing-related discovery
Brian Umpierre Brian Umpierre	10/2/2019 10/2/2019	0.30	\$925.00 \$925.00	\$277.50 \$647.50	Emails with team re possible co-counsel website re Brookdale litigation Emails with K. Stebner re staffing-related discovery - data
Brian Umpierre Sarah Colhy	10/2/2019	0.40	\$925.00	\$370.00	Discussion with K. Stebner re staffing-related discovery - status and scope of data requests
Kathryn Stebner	10/3/2019 10/3/2019	0.10	\$995.00 \$1,300.00	\$99.50 \$390.00	Texts to from S. Stiner re updates on Brookdale San Ramon and mediation Discuss staffing data discovery with B. Umplerre
Sarah Colby Sarah Colby	10/4/2019 10/4/2019	0.50 0.10	\$995.00 \$995.00	\$497.50 \$99.50	Review and edit mediation brief Email to G. Wallace re mediation brief edits
Kathryn Stebner	10/8/2019	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 Brian Umpierre	10/9/2019 10/9/2019	0.40 5.20	\$925.00 \$925.00	\$370.00 \$4,810.00	Email: correspondence with M. Johnson re staffing-related class discovery 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 Kathryn Stebner	10/11/2019 10/11/2019	0.30 0.70	\$1,300.00 \$1,300.00	\$390.00 \$910.00	Review B. Umplerre email re co-counsel meeting at Schneider Wallace re discovery, experts, strategy Meet with B. Umplerre 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 Brian Umpierre	10/11/2019 10/11/2019	0.40	\$925.00 \$925.00	\$370.00 \$277.50	Summary of Schneider Wallace meeting to K. Stebner Emails with K. Stebner re task list following co-counsel meeting
Brian Umpierre	10/11/2019 10/11/2019	0.30	\$925.00 \$925.00	\$277.50 \$462.50	Review draft outreach letters to putative class members
Brian Umpierre Brian Umpierre	10/16/2019	0.70	\$925.00	\$647.50	Review index of newly produced documents Review script for use with calss with putative class members; emails with team re same
Kathryn Stebner Kathryn Stebner	10/19/2019 10/19/2019	0.50	\$1,300.00 \$1,300.00	\$650.00 \$650.00	Review script for use by staff on calls / outreach with putative class members and discuss same with 8. Umpierre 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 FAOs for putiative class member calls and provide feedback
Brian Umpierre Kathryn Stebner	10/19/2019 10/30/2019	0.20	\$925.00 \$1,300.00	\$185.00 \$520.00	Beview G. Kawamuto email re meeting with A. Xu re Brookdale case info for Stebner firm webisite Discuss with B. Umpierre and G. Kawamuto Stebner-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 Brian Umpierre	11/4/2019 11/6/2019	0.50	\$925.00 \$925.00	\$462.50 \$370.00	Review draft fourth set of document requests; email comments re same Review email from S. Colby re % of Brookdale expenses as cost of labor
Brian Umpierre	11/9/2019	0.20	\$925.00	\$185.00	Internal emails re Relativity document review status and availability
Brian Umpierre Kathryn Stebner	11/9/2019 11/10/2019	0.80 1.30	\$925.00 \$1,300.00	\$740.00 \$1,690.00	Review and email comments re draft 30(b)(6) deposition notice Discuss draft 30(b)(6) depo notice topics with S. Colby, B. Umplerre
Brian Umpierre Kathryn Stebner	11/10/2019 11/15/2019	1.30 0.40	\$925.00 \$1,300.00	\$1,202.50 \$520.00	Discuss 30(b)(6) deposition notice topics with K. Stebner and S. Colby Review and comment on internal team emails regarding potential RCFE staffing experts
Brian Umpierre	11/15/2019	0.30	\$925.00	\$277.50	Internal emails re potential RCFE staffing experts
Brian Umpierre Brian Umpierre	11/16/2019 11/18/2019	0.50 0.50	\$925.00 \$925.00	\$462.50 \$462.50	Review coding memo / protocol and email to team re same Review / comment on 30(b)(6) depo notice topics
Brian Umpierre	11/18/2019 11/18/2019	0.20	\$925.00 \$925.00	\$185.00 \$185.00	Review agenda for team call re discovery/review
Brian Umpierre Brian Umpierre	11/18/2019	0.20	\$925.00	\$185.00	Review discovery meet and confer summary re Plaintiffs' requests for residency agreements and arbitration-related docs Review M. Johnson email re Defendants' production of board of director minutes and next steps
Kathryn Stebner Brian Umpierre	11/19/2019 11/19/2019	0.60 3.80	\$1,300.00 \$925.00	\$780.00 \$3,515.00	Discuss further edits to draft 30(b)(6) deposition notice with 8. Umplerre Document review - Umplerre assigned batch
Kathryn Stebner	11/20/2019	1.50	\$1,300.00	\$1,950.00	Co-counsel conference call re status/strategy and to-do items
Brian Umpierre	11/20/2019	5.00	\$925.00 \$925.00	\$4,625.00	Document review - Umpierre assigned batch Conference call amond on counsel re-status/strategy and discovery assignments

Brian Umpierre	11/20/2019	0.20	\$925.00	\$185.00	Review summary of document production regarding resident complaints
Brian Umpierre Brian Umpierre	11/20/2019 11/21/2019	0.90 6.50	\$925.00 \$925.00	\$832.50 \$6,012.50	Review pleadings in Brookdale class action in KY addressing ownership related issues and email to M. Johnson re same Document review - Unipriere assigned batch
Brian Umpierre Brian Umpierre	11/21/2019 11/22/2019	0.20 7.10	\$925.00 \$925.00	\$185.00 \$6,567.50	Review and comment re proposed email response to defense re Brookdale's production of residency agreements Document review - Umpierre assigned batch
Brian Umpierre	11/25/2019 11/26/2019	0.20	\$925.00	\$185.00	Internal emails re scheduling for Brookdale class outreach training call
Brian Umpierre Brian Umpierre	11/26/2019	4.50 0.20	\$925.00 \$925.00	\$4,162.50 \$185.00	Document review - Umplerre assigned batch Review draft discovery meet and confer letter re outstanding issues and impact on case schedule
Kathryn Stebner Brian Umpierre	12/5/2019 12/5/2019	0.60	\$1,300.00 \$925.00	\$780.00 \$277.50	Meet with B. Umpleter en efiscovery status and strategy Review defense email te undates on certain discovers issues and request for extension and meet and confer Review defense email te undates on certain discovers issues and request for extension and meet and confer
Brian Umpierre	12/5/2019 12/11/2019	0.40	\$925.00	\$370.00	Meet with K. Stebner with update re discovery status and strategy
Brian Umpierre Brian Umpierre	12/12/2019	0.20 4.60	\$925.00 \$925.00	\$185.00 \$4,255.00	Email correspondence with co-counsel re BelAire/putative class member call back assignments Document review - Umpierre assigned batch
Brian Umpierre Brian Umpierre	12/12/2019 12/13/2019	0.20 5.50	\$925.00 \$925.00	\$185.00 \$5,087.50	Email correspondence with internal team and T. Close re class outreach protocol Document review - Umpierre assigned batch
Kathryn Stebner Brian Umpierre	12/17/2019 12/17/2019	5.00	\$1,300.00 \$925.00	\$6,500.00 \$4,162.50	Meeting at Schneider Wallace re case strategy / experts / counsel
Brian Umpierre	12/17/2019	1.50	\$925.00	\$1,387.50	Meeting at Schneider Wallace firm re staffling analysis requirements and potential experts Document review - Umpierre assigned batch
Brian Umpierre Kathryn Stebner	12/17/2019 12/18/2019	0.30	\$925.00 \$1,300.00	\$277.50 \$1,040.00	Internal email correspondence re responses to class outreach? Justative class member inquiries Meet with B. Ungeirer ne results of case strategy meeting and next steps from the control of the control
Brian Umpierre Brian Umpierre	12/18/2019 12/18/2019	0.50 5.70	\$925.00 \$925.00	\$462.50 \$5,272.50	Update SharePoint with Stebner-firm call-back assignments; email to internal staff re same Document review - Umpierre assigned batch
Brian Umpierre	12/18/2019	0.40	\$925.00	\$370.00	Meeting with K. Stebner re co-counsel meeting - results and assignments
Brian Umpierre Kathryn Stebner	12/19/2019 12/20/2019	3.80 0.70	\$925.00 \$1,300.00	\$3,515.00 \$910.00	Document review - Umplerre assigned batch Meet with B. Umplerre re Defendants' latest responses and objections to RPDs and motions to compel
Brian Umpierre Brian Umpierre	12/20/2019 12/20/2019	0.70	\$925.00 \$925.00	\$647.50 \$462.50	Review complaint and 30(b)(6) depo notice from Marks-firm's Brookdale action for pertinent information applicable to this action
Brian Umpierre	12/20/2019	0.50	\$925.00	\$462.50	Review Brookdale's objections of 4th set of document requests Meeting with K. Stebner re Brookdale's objections and responses to written discovery and motions to compet
Brian Umpierre Brian Umpierre	12/23/2019 12/31/2019	0.30 1.60	\$925.00 \$925.00	\$277.50 \$1,480.00	Review Brookstale discovery response preadsheet for meet and confer follow up and potential motion to compet Review Brookstale discovery response preadsheet for meet and confer follow up and potential motion to compet Review Brookstale discovery response preadsheet for meet and confer ariuments for why production is required Review Brookstale discovery response spreadsheet for meet and confer ariuments for why production is required
Kathryn Stebner Brian Umpierre	1/4/2020 1/4/2020	0.50	\$1,300.00 \$925.00	\$650.00 \$462.50	Discussion with B. Limplerie re Brookdale insurance records produced in discovery Discussion with K. Stebner re Brookdale insurance information produced in discovery
Kathryn Stebner	1/7/2020	5.00	\$1,300.00	\$6,500.00	Discussion with B. Umpierre re liability insurance policy review and scheduling call with insurance coverage consultant
Brian Umpierre Brian Umpierre	1/7/2020 1/8/2020	4.00 0.50	\$925.00 \$925.00	\$3,700.00 \$462.50	Review and index insurance policies produced in discovery for coverage consultant Review and index insurance policies produced in discovery for coverage consultant Review and index insurance policies produced in discovery for coverage consultant
Brian Umpierre Brian Umpierre	1/9/2020	0.60 1.20	\$925.00 \$925.00	\$555.00 \$1,110.00	Work with internal staff on BelAire/putative class member callbacks and corresponding SharePoint updates including script and protocol. Review and index insurance policies produced in discovery for coverage consultant.
Brian Umpierre	1/9/2020	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 Umpierre Brian Umpierre	1/10/2020 1/13/2020	2.70 0.40	\$925.00 \$925.00	\$2,497.50 \$370.00	Insurance policy project - index for coverage consultant Review draft discovery meet and confer letter re-documents evidencing resident complaints
Kathryn Stebner Kathryn Stebner	1/14/2020 1/14/2020	0.60	\$1,300.00 \$1,300.00	\$780.00 \$390.00	Review package of tiability insurance policy materials to send to consultant Discussion with B. Umplereree insurance policy coverage materials for consultant
Brian Umpierre	1/14/2020	1.20	\$925.00	\$1,110.00	Prepare package for coverage consultant and forward same to K. Stebner
Brian Umpierre Brian Umpierre	1/21/2020 1/22/2020	0.40	\$925.00 \$925.00	\$370.00 \$277.50	Review email correspondence re ES discovery and search terms Discussion with internal staff er class outreach communications
Brian Umpierre Kathryn Stebner	1/22/2020 1/23/2020	0.40 0.50	\$925.00 \$1,300.00	\$370.00 \$650.00	Review email correspondence from G. Willisce re search terms f custodian tasks in advance of team call re same Meet with B. Ungelier for update on class outerach / communications project
Brian Umpierre	1/23/2020	1.00	\$925.00	\$925.00 \$520.00	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 Stebner Brian Umpierre	1/24/2020 1/24/2020	0.40 0.20	\$1,300.00 \$925.00	\$185.00	Review industry article re Brookdale's purchase of additional assisted living facilities and forward same to team Case/fact development - review article from K. Stebner re Brookdale purchase of additional assisted living facilities
Brian Umpierre Kathryn Stebner	1/24/2020 1/25/2020	2.00 0.70	\$925.00 \$1,300.00	\$1,850.00 \$910.00	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 Meet with B. Umpierre re proposed search terms and custodians and concepts from previous RCFE cases
Brian Umpierre	1/25/2020	0.50	\$925.00	\$462.50	Conference call with G. Wallace, S. Colby, D. Marks re proposed ESI search terms and document custodians
Brian Umpierre Brian Umpierre	1/25/2020 1/27/2020	0.60 0.50	\$925.00 \$925.00	\$555.00 \$462.50	Meeting with K. Stebner re proposed search terms and custodians and concepts from previous RCFE cases Review Waymo case re obligation to produce readily accessible responsive documents even if not technically responsive to search terms
Brian Umpierre Kathryn Stebner	1/28/2020 1/31/2020	0.30	\$925.00 \$1,300.00	\$277.50 \$650.00	Review summary of discovery meet and confer call re production of documents evidencing resident complaints Discussion with 8. Umpierre re status of outstanding discovery disputes and motions to compel
Brian Umpierre	1/31/2020	0.30	\$925.00	\$277.50	Review draft discovery meet and confer letter re outstanding discovery disputes and potential resolution
Brian Umpierre Brian Umpierre	2/3/2020 2/4/2020	1.00 0.50	\$925.00 \$925.00	\$925.00 \$462.50	Relativity database searches re Brookdale's company-wide use of Yardi as assessment software Emails with G. Wallace re discovery meet and confer letter regarding production of resident assessment data; phone call with M. Johnson re same
Brian Umpierre Brian Umpierre	2/5/2020 2/6/2020	6.50 0.50	\$925.00 \$925.00	\$6,012.50 \$462.50	Draft meet and confer letter re production of assessment/payroll data for staffing analysis Discussion with 6, Wallace, M. (Johnson or assessment/payroll data for staffing analysis
Kathryn Stebner Brian Umpierre	2/7/2020	0.70	\$1,300.00	\$910.00	Meet with B. Umpierre re request for assessment / payroll data and discuss meet and confer letter to counsel re same
Brian Umpierre	2/7/2020 2/7/2020	1.00 0.50	\$925.00 \$925.00	\$925.00 \$462.50	Edits to assessment/payroll data meet and confer letter, circulate to G. Wallace, M. Johnson for review, comment Finalize assessment/payroll meet and confer letter and send to defense
Brian Umpierre Brian Umpierre	2/7/2020 2/7/2020	0.40	\$925.00 \$925.00	\$370.00 \$370.00	Meet with K. Stebner re request for assessment / payroll data and discuss meet and confer letter to counsel re same Review operative and near-final list of proposed search terms
Brian Umpierre Brian Umpierre	2/10/2020 2/10/2020	0.50	\$925.00 \$925.00	\$462.50 \$740.00	Review operative draft of Statement of [Discovery] issues Review key documents on Relativity database re service alignment, labor tracking, interpretive guidelines
Brian Umpierre	2/11/2020	0.50	\$925.00	\$462.50	Review operative draft of Statement of (Discovery) Issues; email to G. Wallace re same
Brian Umpierre Brian Umpierre	2/12/2020 2/12/2020	0.50 0.60	\$925.00 \$925.00	\$462.50 \$555.00	Review operative Statement of [Discovery] issues; email comments/edit to 6. Wisilaze Review operative Statement of [Discovery] issues; email comments/edit to 6. Wisilaze Review oddfinous key ofccuments on Resitativity database re-service adjument; email to M. Johnson re-same
Kathryn Stebner Kathryn Stebner	2/13/2020 2/13/2020	1.00 0.60	\$1,300.00 \$1,300.00	\$1,300.00 \$780.00	Phone call with B. Umpierre, Alex Stuart (consultant) re Brookdale insurance policies / coverage, discussion with B. Umpierre re same. Discussion with B. Umpierre re follow up items following call with coverage consultant
Brian Umpierre	2/13/2020	1.00	\$925.00	\$925.00	Phone call with K. Stebner and Alex Stuart [insurance consultant] re Brookdale insurance policies / coverage
Brian Umpierre Brian Umpierre	2/13/2020 2/13/2020	0.60	\$925.00 \$925.00	\$555.00 \$185.00	Discussion with K. Sebere re follow up items following call with insurance consultant Pione call with K. Waltee re Brookstide insurance coverage and discussion with coverage consultant
Brian Umpierre Brian Umpierre	2/13/2020 2/14/2020	0.40	\$925.00 \$925.00	\$370.00 \$185.00	Review Brookstate's portion of discovery letter brief re production of documents evidencing resident complaints Review A. Kelhn (Brookstate Executive Director) deposition notice
Brian Umpierre	2/17/2020	0.30	\$925.00	\$277.50	Review discovery meet and confer letter re Brookdale's overbroad production
Kathryn Stebner Brian Umpierre	2/18/2020 2/18/2020	0.70 0.40	\$1,300.00 \$925.00	\$910.00 \$370.00	Meet with B. Umpiere ne discovery - status of meet and confers and joint statements/MTCs re staffing analysis discovery Email correspondence with M. Johnson ne 2/19 meet and confers session; download assessment software / task time documents relevant to same
Brian Umpierre Brian Umpierre	2/18/2020 2/18/2020	1.80	\$925.00 \$925.00	\$1,665.00 \$277.50	Prepare for 2/19 meet and confer session - review PSS documents produced in discovery, meet and confer letter, final Joint Statement, Brookdale's Set 4 RPD responses Review and comment on Brookdale's portion of loint statement on scheduling
Brian Umpierre	2/18/2020	0.60	\$925.00	\$555.00	Meet with K. Stebner re discovery update - status of meet and confers and joint statements/MTCs re staffing analysis discovery
Kathryn Stebner Brian Umpierre	2/18/2020 2/19/2020	0.50 1.20	\$1,300.00 \$925.00	\$650.00 \$1,110.00	Meet with B. Umplerre re discovery update Telephonic meet and confer with G. Wallace re production of assessment/payroll data
Brian Umpierre Kathryn Stebner	2/19/2020 2/20/2020	0.30	\$925.00 \$1,300.00	\$277.50 \$390.00	Email correspondence with G. Wallace re results of 2/19 meet and confer session regarding discovery, assessment/payroll data production Receive update from B. Umpierre re meet and confer on staffing analysis discovery
Brian Umpierre	2/20/2020	0.70	\$925.00 \$925.00	\$647.50	Discussion with G. Wallace and M. Johnson re discovery plan
Brian Umpierre Brian Umpierre	2/20/2020	0.40 0.40	\$925.00 \$925.00	\$370.00 \$370.00	Review further edits to Joint Statement re-schedule following insertion of Brookdale's portion Review M. Johnson summary of 2/19 discovery meet and confer and respond
Brian Umpierre Brian Umpierre	2/21/2020 2/21/2020	0.50	\$925.00 \$925.00	\$462.50 \$277.50	Review draft M. Johnson letter demanding a pre-motion to compel final meet and confer on Defendants' production or playroll and assessment data Review and recomment on M. Johnson email identified in deruments needed from individuals to rillies no traffel in a certaria (position in
Brian Umpierre	2/21/2020 2/24/2020	0.70 0.30	\$925.00 \$925.00	\$647.50 \$277.50	Review budget-related materials produced in discovery, email to M. Johnson re strategy
Brian Umpierre Kathryn Stebner	2/26/2020	0.50	\$1,300.00	\$650.00	Email to M. Johnson re Brookdale's production of budgets / budget information Meet with B. Umpletre re update on discovery meet and confers re staffing analysis and production of assessment and payroll data
Brian Umpierre Brian Umpierre	2/26/2020 2/26/2020	0.20 0.50	\$925.00 \$925.00	\$185.00 \$462.50	Phone call with G. Wallace re production of assessment / payroll data for staffing analysis Meeting with K. Stebner re update on discovery meet and confers re staffing analysis and production of assessment and payroll data
Kathryn Stebner Brian Umpierre	3/3/2020 3/3/2020	0.40	\$1,300.00 \$925.00	\$520.00 \$277.50	Discuss draft stipulation on class certification schedule with B. Umpierre Phone call with Beláire contact / putative class member (BP); email summany of same
Brian Umpierre	3/3/2020	0.20	\$925.00	\$185.00	Review stipulation on schedule for class certification
Brian Umpierre Kathryn Stebner	3/3/2020 3/3/2020	0.30 0.20	\$925.00 \$1,300.00	\$277.50 \$260.00	Meet with K. Stebner to discuss proposed schedule for class certification briefing Discuss proposed class certification briefing schedule with B. Umpierre
Brian Umpierre Brian Umpierre	3/4/2020 3/5/2020	0.80	\$925.00 \$925.00	\$740.00 \$555.00	Phone call (cont'd) with BelAire contact / putative class member (BP) re background and options; email summary to internal staff with follow up tasks Review draft brint discovery letter brief re ESI: email to M. Johnson re same
Brian Umpierre Kathryn Stebner	3/5/2020	0.70	\$925.00 \$1.300.00	\$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 Meet with B. Umpierre re plan for Plaintiffs' discovery responses
Brian Umpierre	3/6/2020	1.00	\$925.00	\$925.00	Review / comment on proposed ESI search term spreadsheet; email to M. Johnson re same
Brian Umpierre Brian Umpierre	3/6/2020 3/6/2020	0.40	\$925.00 \$925.00	\$370.00 \$462.50	Meeting with K. Stebner re Pisinitiffs' written discovery responses and responsibilities/assignments Conference call among co-counted re Pisinitiffs' isocowery responses
Brian Umpierre Brian Umpierre	3/6/2020 3/7/2020	0.40 2.50	\$925.00 \$925.00	\$370.00 \$2,312.50	Review and comment re defense counset's response to discovery letter briefs re ESI and staffing analysis data Review Brookdale facility management agreements and draft memo re control
Brian Umpierre Brian Umpierre	3/9/2020 3/9/2020	0.50 0.20	\$925.00 \$925.00	\$462.50 \$185.00	Review draft proposed class representative declarations supporting class certification
Brian Umpierre Brian Umpierre	3/9/2020	0.20	\$925.00	\$277.50	Review M. Johnson email responding to defense re discovery letter briefs Internal email correspondence following discovery meet and confer re number of permissible internogatories
Brian Umpierre Brian Umpierre	3/10/2020 3/10/2020	0.40	\$925.00 \$925.00	\$370.00 \$370.00	Review Plaintiffs' portion of draft letter brief re production of residency agreements Review email correspondence between parties re proposal for addressing discovery issues
Brian Umpierre	3/10/2020 3/11/2020	0.50	\$925.00 \$1,300.00	\$462.50 \$780.00	Review J. Yellin email summarizing call with former Brookdale ED - case/fact development Discuss status of discovery regionations / joint statements and status of plaintiffs' responses with B. Umpierre
Kathryn Stebner Brian Umpierre	3/11/2020	0.60 0.50	\$925.00	\$462.50	Review ongoing email correspondence between parties re proposal for addressing discovery issues
Brian Umpierre Brian Umpierre	3/11/2020 3/11/2020	0.50 0.50	\$925.00 \$925.00	\$462.50 \$462.50	Review Brookdate's portion of letter brief seeking re production of assessment / payroll data Review and comment Brookdate's portion of letter brief re production of ESI
Brian Umpierre Brian Umpierre	3/11/2020 3/11/2020	0.50	\$925.00 \$925.00	\$462.50 \$370.00	Update K. Stebner on status of discovery negotiations / joint statements and status of plaintiffs' responses Review Plaintiffs' portion of letter brief on identifies of residents with disabilities
Brian Umpierre	3/14/2020	1.60	\$925.00	\$1,480.00	Finalize memo re evidence of Brookdale control from management agreement(s)
Brian Umpierre Brian Umpierre	3/19/2020 3/20/2020	0.70 0.50	\$925.00 \$925.00	\$647.50 \$462.50	Review internal emails re change of defense counsel, look up new counsel backgound Review mit to D. Marks restricting data and analysis, next steps and strategy
Kathryn Stebner Brian Umpierre	3/25/2020 3/26/2020	0.60 0.30	\$1,300.00 \$925.00	\$780.00 \$277.50	Review B. Limpierre memo re management agreement language indicating BSL, Inc. control. Review email from defense following introductory call and plan for resolving outstanding discovery issues
Brian Umpierre	3/31/2020 4/2/2020	1.00	\$925.00 \$925.00 \$1,300.00	\$925.00 \$390.00	Review draft Stiner interrogatory responses
Kathryn Stebner Brian Umpierre	4/2/2020	0.30	\$925.00	\$370.00	Receive update from 8. Umpierre re M&C on staffing analysis discovery Review and comment re M. Johnson email to defense re status of outstanding discovery, pending letter briefs re same, and plan for resolving without court intervention
Brian Umpierre Brian Umpierre	4/2/2020 4/3/2020	0.10 0.50	\$925.00 \$925.00	\$92.50 \$462.50	Email correspondence with M, Johnson re payroll data codes required for staffing analysis Review draft template responses to Brookdale's document requests
Brian Umpierre	4/6/2020 4/6/2020	1.00	\$925.00 \$925.00	\$925.00 \$370.00	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 Umpierre Brian Umpierre	4/8/2020	1.10	\$925.00	\$1,017.50	Review D. Marks email re data required for staffing analysis Review detense email summarzing previous day's discovery call; review and comments re Brookdale's portions of letter discovery briefs
Kathryn Stebner Brian Umpierre	4/12/2020 4/13/2020	0.70 1.50	\$1,300.00 \$925.00	\$910.00 \$1,387.50	Meet with B. Umpierre re staffling expert (Flores, Schroyer) reply declarations and rebuttal points Review Plaintiffs draft ROG/RPD responses and outstanding issues; notes re name; in preparation for and in advance of 1 pm call with team
Brian Umpierre Brian Umpierre	4/13/2020 4/13/2020	1.70	\$925.00 \$925.00	\$1,572.50	Team discovery conference call re Plaintiffs' ROG/RPD responses
Brian Umpierre	4/14/2020	0.20 0.30	\$925.00	\$185.00 \$277.50	Review defense email with update on outstanding discovery still owed Forward discovery responses in similar understaffing tiligation to team for review/reference in drafting Plaintiffs' responses
Kathryn Stebner Brian Umpierre	4/16/2020 4/16/2020	0.50 0.40	\$1,300.00 \$925.00	\$650.00 \$370.00	Meet with B. Umpierre re status/strategy following co-counsel team call re discovery Meeting with K. Stebner to update re status/strategy following co-counsel team call re discovery
Kathryn Stebner Kathryn Stebner	4/18/2020 4/18/2020	0.20	\$1,300.00 \$1,300.00	\$260.00 \$260.00	Review B. Umpierre re- enable to objections to declarations from residents with POAs Email to B. Umpierre re- re- objections to declarations from residents with POAs
Kathryn Stebner	4/21/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre re offensive Daubert motions against Defendants' 'staffing' experts and reply declarations from additional of Plaintiffs' experts in response
Brian Umpierre Brian Umpierre	4/22/2020 4/22/2020	1.50 0.20	\$925.00 \$925.00	\$1,387.50 \$185.00	Email correspondence to M. Johnson re data fields in Kronos payroll software; review meet and confer correspondence in similar Bitigationand exemplar reports re same in advance of meet and confer session with defense on 4/23 Review D. Marks email re necessary data for staffing analysis
Kathryn Stebner Brian Umpierre	4/24/2020 4/24/2020	1.00	\$1,300.00 \$925.00	\$1,300.00 \$462.50	Review 9th Circuit menorandum order on motion to compel arbitration Review 9th Circuit menorandum order on motion to compel arbitration Review order and confer correspondence need for employee wage data in connection with document requests seeking payroll data; email to M. Johnson re same
Brian Umpierre	4/24/2020	0.70	\$925.00	\$647.50	Review 9th Cir memorandum and order on motion to compet
Brian Umpierre Kathryn Stebner	4/24/2020 4/25/2020	0.40 0.30	\$925.00 \$1,300.00	\$370.00 \$390.00	Review PSS (assessment) data produced by Brookdale for use in staffing analysis Review team emails re order denying motion to compel arbitration
Kathryn Stebner Brian Umpierre	4/26/2020 4/27/2020	0.70	\$1,300.00 \$925.00	\$910.00 \$370.00	Phone call with S. Collay re order on motion to compel arbitration and next steps Review draft stipulation regarding production of residency agreements; email to M. Johnson re same
Kathryn Stebner	4/28/2020	0.30	\$1,300.00	\$390.00	review unan supulation regarding production or residently agreements, emant of recommender in a supulation regarding production or desidently agreements, emant of recommender in a supulation of the supulation o

Kathryn Stebner	4/28/2020	0.40	\$1,300.00	\$520.00	Discussion with 8. Umplerer er responsibility for Schmidt discovery / responses / deposition Discussion with 5. Shaher or Plaintiff Schmidt discovery / responses / deposition
Brian Umpierre	4/28/2020	0.30	\$925.00	\$277.50	Email correspondence with team re strategy for finalizing Plaintiffs' discovery responses and client contacts re same
Brian Umpierre	4/29/2020	0.40	\$925.00	\$370.00	
Brian Umpierre	4/29/2020	0.40	\$925.00	\$370.00	Email to B. Bien-Kahn re responsibility for Plaintiff Schmidt's discovery responses Review draft Schmidt and Fisher (Schmidt's conservator) proposed class representative declarations in support of class certification
Brian Umpierre	4/30/2020	0.50	\$925.00	\$462.50	
Brian Umpierre	4/30/2020	0.70	\$925.00	\$647.50	Review comprehensive internal analysis of staffling analysis data produced to date and next steps re same and response thereto
Brian Umpierre	4/30/2020	0.80	\$925.00	\$740.00	Review final draft of 20(f) reply and email to G. Wallace re same
Kathryn Stebner	5/1/2020	0.30	\$1,300.00	\$390.00	Meet with 8. Umpierre re internal analysis of staffing analysis data produced to date and next steps Review and edit draft meet and confer letter re production of resident assessment data; email to M. Johnson re same
Brian Umpierre	5/1/2020	0.40	\$925.00	\$370.00	
Brian Umpierre	5/1/2020	0.30	\$925.00	\$277.50	Review discovery overview memo re outstanding items and plan of action Review understraffing class action complaint field against Revokald Revokald in Int case/flact development
Brian Umpierre	5/5/2020	0.80	\$925.00	\$740.00	
Brian Umpierre	5/6/2020	0.50	\$925.00	\$462.50	Review draft stipulation in production of residency agreements and email correspondence with team re same Email correspondence with 1, blancinon in Brooklaid end counters indicating Brook State seistin is falkabas formant for all residents; forward notes re same
Brian Umpierre	5/8/2020	0.80	\$925.00	\$740.00	
Brian Umpierre	5/20/2020	0.50	\$925.00	\$462.50	Email correspondence with A. Xu and internal staff re putative class member contact and further follow up Review Brookdale written discovery propounded to Plaintiff Schmidt in advance of belephone calls with his conservators in order to respond to discovery requests
Brian Umpierre	5/26/2020	1.50	\$925.00	\$1,387.50	
Brian Umpierre Brian Umpierre	5/26/2020 5/27/2020	0.70	\$925.00 \$925.00	\$647.50 \$740.00	Compile list of interview questions / docs to inquire about re class rep discovery Emails to Mary Gallagher, Heather Fisher re Schmidt written discovery responses and scheduling phone conferences
Brian Umpierre	5/27/2020	5.50	\$925.00	\$5,087.50	Review Plaintiff Schmidt documents on Relativity database and draft written discovery responses based thereon Email correspondence with M. Gallagher, H. Fisher re Plaintiff Schmidt and scheduling meeting time
Brian Umpierre	5/27/2020	0.50	\$925.00	\$462.50	
Kathryn Stebner	5/28/2020	0.50	\$1,300.00	\$650.00	Meet with B. Umplere re discovery update - Schmidt preparation and responses and status of other plaintiffs' responses following co-counsel team call re same
Brian Umpierre	5/28/2020		\$925.00	\$1,387.50	Telephone conversation with M. Galladher (former conservator) in Rajoh Schmidt's exercisence at Brooksidae for presaration of Schmidt draft ROCRPD responses
Brian Umpierre	5/28/2020	5.40	\$925.00	\$4,995.00	recipionic curves savion with r. Ostangian (rouns curves variety in english curves variety in consumer on preparation or occumulation and construct responses. Review Plantiff so discurrents in Relativity database and of aft 80G, RPD responses including new information from former conservator N. Exhauster conservator N.
Brian Umpierre	5/29/2020	2.30	\$925.00	\$2,127.50	
Brian Umpierre	5/29/2020	0.40	\$925.00	\$370.00	Review B. Bien-Kahn email and attached materials re class representative discovery responses in advance of team call re same
Brian Umpierre	6/1/2020	0.70	\$925.00	\$647.50	Conference call among team re draft written discovery responses - status/strategy Email to S. Gebhardt (family) re Plaintiff Schmidt, experience at Brookdale, discovery responses, and requesting phone conference
Brian Umpierre	6/1/2020	0.20	\$925.00	\$185.00	
Brian Umpierre	6/1/2020	6.50	\$925.00	\$6,012.50	Draft RPD/ROG responses for Plaintiff Schmidt Draft ROG/RPD responses for Plaintiff Schmidt
Brian Umpierre	6/2/2020	6.20	\$925.00	\$5,735.00	
Brian Umpierre	6/2/2020	0.20	\$925.00	\$185.00	Email: correspondence re H. Frisher (Schmidt conservator) re Brooksfale personnel at Tracy while R. Schmidt in residence
Brian Umpierre	6/3/2020	4.50	\$925.00	\$4,162.50	Draft BOG/RPP responses for Palintif Schmidt
Brian Umpierre	6/3/2020	0.50	\$925.00	\$462.50	Email: correspondence with I. Fisher (Schmidt Conservator) listing additional questions related to Schmidt ROU/RPD responses
Brian Umpierre	6/4/2020	1.40	\$925.00	\$1,295.00	Telephone convensation with S. Gebrandt (Ismaliy) is Related (Ismaliy) and Rough Schmidt and death within discovery responses
Brian Umpierre	6/4/2020	0.30	\$925.00	\$277.50	Email: correspondence with I. Fisher (Schmidt Conservator) re discovery responses and search for responsive documents
Brian Umpierre	6/4/2020	4.20	\$925.00	\$3,885.00	Draft BOG/RPD responses for Palmidt Schmidt
Kathryn Stebner	6/5/2020	1.70	\$1,300.00	\$2,210.00	Review draft discovery responses for Plaintiff Schmidt Draft ROG/RPD responses for Plaintiff Schmidt
Brian Umpierre	6/5/2020	3.40	\$925.00	\$3,145.00	
Brian Umpierre Brian Umpierre	6/9/2020 6/10/2020	0.30	\$925.00 \$925.00	\$277.50 \$462.50	Peniew internal as sessment data email to D. Marks concerning databases Review draft letter breif re emergency evacuation and transportation policies and cover email re same
Kathryn Stebner	6/12/2020	2.20	\$1,300.00	\$2,860.00	Review draft discovery responses for Plaintiff Schmidt
Brian Umpierre	6/12/2020	0.40	\$925.00	\$370.00	
Brian Umpierre	6/12/2020	0.40	\$925.00	\$370.00	Email correspondence with Plaintiff Schmidt's representatives re document collection and production Review M. Johnson email update on assessment data production and meet and confer efforts re same
Kathryn Stebner	6/13/2020	0.30	\$1,300.00	\$390.00	Email to B. Umplerre re draft Schmidt discovery responses and phone call re same Meet with B. Umplerre status of Schmidt / all Plaintiffs discovery and Defendants' production of resident assessment data / staffing formula
Kathryn Stebner	6/15/2020	0.80	\$1,300.00	\$1,040.00	
Brian Umpierre	6/15/2020	0.30	\$925.00	\$277.50	Internal email correspondence regarding potentials data sepert and contact by defense counsed. Discuss with K. Scheene status of Scheme statu
Brian Umpierre	6/15/2020	0.60	\$925.00	\$555.00	
Brian Umpierre	6/18/2020	0.20	\$925.00	\$185.00	Email correspondence with N. Gallagiter (former consensator) is search for Plaintiff Schmidt documents responsive to Brooktale's document requests
Brian Umpierre	6/22/2020	0.80	\$925.00	\$740.00	Review Plaintiff Schmidt documents received from Consensator Patier
Brian Umpierre Brian Umpierre	6/23/2020 6/24/2020	0.50	\$925.00 \$925.00	\$462.50 \$647.50	Review email correspondence with defense counsel re further attempts to obtain assessment data for staffing analysis Email correspondence with G. Wallace regarding and attaching ESI search terms from similar understaffing cases
Brian Umpierre	6/26/2020	0.30	\$925.00	\$277.50	Review email correspondence re further update on production of useable resident assessment data
Kathryn Stebner	6/30/2020		\$1,300.00	\$650.00	Review B. Umpierre email correspondence re ESI discovery bottleneck and Defendants' responses to questions about assessment software capabilities
Kathryn Stebner Kathryn Stebner	7/1/2020 7/7/2020	0.30	\$1,300.00 \$1,300.00	\$390.00 \$650.00	Meet with B. Umplerer e Defendants' responses to questions about assessment software capabilities Meet with B. Umplerer e discovery status/stategy
Brian Umpierre Brian Umpierre	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 Umpierre	7/7/2020	0.50	\$925.00	\$462.50	Review delense response to targeted questions on assessment data production and capabilities and internal emails re-same
	7/10/2020	0.10	\$925.00	\$92.50	Email correspondence with M. Gallagher re responsive Schmidt documents for review/production
Brian Umpierre	7/10/2020	0.30	\$925.00	\$277.50	Review proposals for discovery conference with Magistrate Judge Beeler Draft / edit ROG/PPD responses for Plaintiff Schmidt
Brian Umpierre	7/17/2020	2.80	\$925.00	\$2,590.00	
Brian Umpierre	7/20/2020	0.20	\$925.00	\$185.00	Forward to team form of verification with language regarding reliance on information obtained from attorneys Draft / edit ROG/RPD responses for Plaintiff Schmidt
Brian Umpierre	7/20/2020	2.60	\$925.00	\$2,405.00	
Brian Umpierre Brian Umpierre	7/20/2020 7/22/2020	0.50	\$925.00 \$925.00	\$462.50 \$277.50	Team conference call or Palmintf discovery response status and strategy Prisons call with May you Staggler (Demon conservation is peach for responsive documents relevant to Plaintiff Schmidt
Brian Umpierre Brian Umpierre	7/27/2020 7/29/2020	0.10	\$925.00 \$925.00	\$92.50 \$925.00	Email to M. Gallaigher re-search for responsive documents relevant to Plaintiff Schmidt Review Brookdale's proposed ESI search terms; compare to Plaintiff Schmidt
Kathryn Stebner	7/30/2020 7/30/2020	0.10	\$1,300.00	\$130.00 \$520.00	Review B. Umpierre email re Defendants' responses to questions about assessment software capabilities
Kathryn Stebner Brian Umpierre	7/30/2020	0.40 2.50	\$1,300.00 \$925.00	\$2,312.50	Meet with 8. Umplerre re Defendants' responses to questions about assessment software capabilities Review Brookdale's proposed ESI search terms and compare to Plainitifs' list (confd); email to 1. Close re same
Brian Umpierre	8/5/2020	2.10	\$925.00	\$1,942.50	Review G. Wallace edits to draft discovery responses and conform same to Schmidt responses as necessary Finalize operative draft of Plainitff Schmidt ROG/RPD responses to G. Wallace for review, comment
Brian Umpierre	8/6/2020	4.50	\$925.00	\$4,162.50	
Brian Umpierre	8/7/2020	0.60	\$925.00	\$555.00	Prepare drafts of Schmidt ROG/RPD responses for conservators Fisher/Gallagher; send with explanatory transmittal email for review highlighting key areas to consider Review G. Wallace comments on draft Schmidt ROG responses; incorporate into draft Schmidt RPD responses as applicable; finalize draft and circulate to team for review/comment.
Brian Umpierre	8/10/2020	7.80	\$925.00	\$7,215.00	
Brian Umpierre	8/10/2020	1.00	\$925.00	\$925.00	Finalize draft Schmidt ROG responses incorporating G. Wallace edits/answering questions; recirculate for review/comment Review draft discovery letter brief re production of audit documents
Brian Umpierre	8/10/2020	0.60	\$925.00	\$555.00	
Brian Umpierre	8/11/2020	0.20	\$925.00	\$185.00	Review draft meet and confer letter re production of Kronos data; email to M. Johnsson re same Further edits to draft Schmidt ROG responses; email to team re Bates number citations
Brian Umpierre	8/11/2020	1.40	\$925.00	\$1,295.00	
Brian Umpierre	8/11/2020	0.10	\$925.00	\$92.50	Email to M. Gallagher (former conservator) re Schmidt document collection Review final darks of Schmidt discovery reaponses:
Kathryn Stebner	8/12/2020	1.20	\$1.300.00	\$1.560.00	
Kathryn Stebner	8/12/2020	0.50	\$1,300.00	\$650.00	Discuss final draits of Schmidt discovery responses with B. Umplerre Further edits to Schmidt ROG/RPD responses email correspondence with H. Fisher (Schmidt conservator) re-same, including verification forms
Brian Umpierre	8/12/2020	7.50	\$925.00	\$6,937.50	
Brian Umpierre	8/12/2020	0.30	\$925.00	\$277.50	Review defense email proposal on ESI search terms
Brian Umpierre	8/13/2020	0.50	\$925.00	\$462.50	Finalize Plaintiff Schmidt ROG responses and verification and forward to co-coursel for final formatting and service
Brian Umpierre	8/13/2020	3.20	\$925.00	\$2,960.00	Further edits to Schmidt RPDs and circulate to team with additional questions before finalizing; email with A. Xu re same
Brian Umpierre	8/13/2020	0.50	\$925.00	\$462.50	Review M. Johnson's summary of meet and confer re payroll data production Finalize Schmidt RPD responses; email correspondence with team re outstanding questions therein; forward to RBGG for service
Brian Umpierre	8/14/2020	0.30	\$925.00	\$277.50	
Brian Umpierre	8/24/2020	1.10	\$925.00	\$1,017.50	Team call re preparing Plainiff documents for production and reductions; emails with R. Bonner re review/reductions of Plainifff Schmidf's documents Review Comments Review Comments Review Comments (Review Comments Comment on Plainifff's direct Education and Plainiff's direct Education Plainiff's direct Educat
Brian Umpierre	8/27/2020	0.90	\$925.00	\$832.50	
Brian Umpierre	8/27/2020	0.80	\$925.00	\$740.00	Review Schmidt documents to be produced in discovery for privilege/redactions; email to R. Bonner re same Final review/redactions to Schmidt documents to be produced in discovery and notes re same; forward to R. Bonner to prepare for production
Brian Umpierre	8/28/2020	0.50	\$925.00	\$462.50	
Brian Umpierre	8/28/2020	0.30	\$925.00	\$277.50	Review M. Johnson email to defense summarizing Plaintiffs' understanding of status of discovery re construction and alteration of Brookdate's facilities in CA
Brian Umpierre	9/3/2020	0.40	\$925.00	\$370.00	Review defense response to Plaintiffs' email re status of construction / alteration discovery
Kathryn Stebner Brian Umpierre	9/10/2020 9/10/2020	0.70	\$1,300.00 \$925.00	\$910.00 \$647.50	Meet with B. Limpierre re status of ESI search term negotiations and discovery re dates of facility construction / alteration Meet with K. Stebner re status of ESI search term negotiations and discovery re dates of facility construction / alteration
Brian Umpierre Kathryn Stebner	9/15/2020 9/16/2020	0.90	\$925.00 \$1,300.00	\$832.50 \$260.00	Review further edits to ESI search terms, emails with team re same Review B. Umolerre email re edits to Brookdak's proposed search terms and custodians and proposal re same
Kathryn Stebner Brian Umpierre	9/16/2020 9/16/2020	0.20	\$1,300.00 \$925.00	\$260.00 \$925.00	Remail to B. Umpierer re-edits to Brookshie's proposed estate from an autocardinate and proposale same Remail to B. Umpierer re-edits to Brookshie's proposed ESI search terms and custodians and proposale results Review additional edits to Brookshie's proposed ESI search terms and document custodians; email to M. Johnson, S. Colby, G. Wallace, re-same
Brian Umpierre Brian Umpierre Brian Umpierre	9/18/2020	1.00 0.50	\$925.00	\$462.50	Review draft response to discovery meet and confer letter re Plaintiffs' responses to first set of requests for documents
Kathryn Stebner	9/29/2020 10/1/2020	0.50 0.40	\$925.00 \$1,300.00	\$462.50 \$520.00	Review defense response to Plaintiffs' meet and confer letter re Plaintiffs' responses to first set of document requests Meet with B. Umplerre for update on meet and confers on Plaintiffs' discovery responses and proposal to extend class certification deadline 6 months
Brian Umpierre Brian Umpierre	10/1/2020 10/1/2020	0.30	\$925.00 \$925.00	\$277.50 \$277.50	Review email correspondence re proposal to extend deadline to move for class certification by 6 months Discussion with K. Stebner re continuing class certification briefing schedule
Brian Umpierre	10/6/2020	0.40	\$925.00	\$370.00	Review draft stipulation and edits re proposal for new class certification schedule Email to 14. Jahonson re status of efforts to bothal occurrent from Parintiff Schemidt's previous conservator Mary Gallagher
Brian Umpierre	10/8/2020	0.30	\$925.00	\$277.50	
Brian Umpierre	10/9/2020	1.50	\$925.00	\$1,387.50	Compile list of document/sources detailing Raphs Schmidt's disabilities Meet with B. Umpierre e status of negotistions on calcus certification schedule
Kathryn Stebner	10/16/2020	0.20	\$1,300.00	\$260.00	
Brian Umpierre Brian Umpierre	10/16/2020 10/16/2020	0.40	\$925.00 \$925.00	\$370.00 \$185.00	Review further correspondence re proposals for case / class certification schedule Discussion with N. Scheder re continuing class certification briefing schedule
Brian Umpierre Kathryn Stebner	10/29/2020 10/30/2020	0.40	\$925.00 \$1.300.00	\$370.00 \$650.00	Review meet and confer correspondence from defense re document custodians and ESI search terms Discuss status of written discovery negotiations, including custodians and search terms, and impact on class certification with 8. Umpierre
Brian Umpierre	10/30/2020	0.50	\$925.00	\$462.50	Update K. Stebner on status of written discovery negotiations, including custodians and search terms, and impact on class certification Review meet and confer correspondence in preparation for telephonic discovery meet and confer with G. Wallace; email to G. Wallace re proposed custodians
Brian Umpierre	11/4/2020	1.80	\$925.00	\$1,665.00	
Brian Umpierre Brian Umpierre	11/5/2020 11/5/2020	0.50	\$925.00 \$925.00	\$462.50 \$647.50	Phone call with G. Wallace in preparation for discovery meet and confer with defense re document custodians Telephonic meet and confer with G. Wallace, N. Jacobsen, G. Mastman re document custodians, production of documents evidencing Plaintiff' disabilities, requests for communications that may implicate privilege, and other specific interrogatories
Brian Umpierre Brian Umpierre	11/5/2020 11/5/2020 11/5/2020	0.50	\$925.00 \$925.00	\$462.50 \$370.00	Prepare notes of 11/5 discovery meet and confer and forward to G. Wallace for review and comment
Kathryn Stebner	11/10/2020	0.50	\$1,300.00	\$650.00	Review defense letter following today's discovery meet and confer Meet with B. Umplerre re discovery M&C re Plaintiffs' discovery responses
Brian Umpierre	11/10/2020	0.40	\$925.00	\$370.00	Meeting with K. Stehner re discovery M&C re Plaintiffs' discovery responses Email to G. Wallace re privilege log and attaching exemplar used in similar understaffing litigation
Brian Umpierre	11/11/2020	0.40	\$925.00	\$370.00	
Brian Umpierre	11/12/2020	0.50	\$925.00	\$462.50	Team call re Plainitffs' supplemental discovery responses following meet and confer with defense re same
Brian Umpierre	11/12/2020	0.70	\$925.00	\$647.50	Email to team summarizing process for compiling privilege log used in similar understaffing Bitigation and attaching exemptar documents
Kathryn Stebner Brian Umpierre	11/13/2020 11/16/2020	0.30	\$1,300.00 \$925.00	\$390.00 \$370.00	Discuss potential supplemental discovery responses from Plaintiffs with 8. Umpierre Emails with 8. Seyer re complication of privilege log
Brian Umpierre Kathryn Stebner	11/16/2020 11/20/2020	0.40	\$925.00 \$1,300.00	\$370.00 \$650.00	Review internal correspondence re potential additional document custodians Meet with B. Umpierre re status of search terms negotiations and counter-proposal on further discovery of Plaintiffs
Brian Umpierre Brian Umpierre	11/20/2020 11/20/2020	0.50	\$925.00 \$925.00	\$462.50 \$185.00	Review draft meet and confer letter re ESI and search terms; email to M. Johnson re same Forward email regarding Plaintiffs' counter-proposal for discovery seeking Plaintiffs' email addresses and social media user names, including proposed revision
Brian Umpierre Kathryn Stebner	11/20/2020 12/1/2020	0.40	\$925.00 \$1,300.00	\$370.00 \$390.00	Meet with K. Stebner re status of search terms negotiations and counter-proposal on further discovery of Plaintiffs Discuss result of co-counsel meeting re-outstanding discovery
Brian Umpierre Brian Umpierre	12/1/2020 12/1/2020	1.10	\$925.00 \$925.00	\$1,017.50 \$277.50	Team discovery call re status / strategy / next steps Email correspondence to Schmidt conservators H. Fisher and M. Gallagher re supplemental interrogatory responses
Brian Umpierre Brian Umpierre	12/4/2020 12/4/2020	0.40	\$925.00 \$925.00	\$370.00 \$462.50	Perpare for following bother call with H. Esher (Schmidt conservator) re supplemental BIOG responses Telephone call with H. Fisher (Schmidt conservator) re supplemental BIOG responses Telephone call with H. Fisher (Schmidt conservator) re supplemental RIOG responses and production of documents
Brian Umpierre	12/7/2020	0.40	\$925.00	\$370.00	Review defense response to targeted questions regarding production of payroll/timkeeping data
Brian Umpierre Brian Umpierre	12/8/2020 12/8/2020	0.60	\$925.00 \$925.00	\$555.00 \$370.00	Discovery team call re Plaintiff document productions and search/review for additional responsive documents - strategy and protocol Phone call with G. Wallace re propounding damages discovery
Brian Umpierre	12/8/2020	2.30	\$925.00	\$2,127.50	Draft written discovery re Plaintiff' damages Review Plaintiff Schmidt draft supplemental discovery responses
Kathryn Stebner	12/9/2020	0.60	\$1,300.00	\$780.00	
Brian Umpierre	12/9/2020	2.00	\$925.00	\$1,850.00	Review written discovery propounded to date re new damagies-oriented requests; finalize draft requests; email to G. Wallace re same Draft supplemental Schmidt RDG responses and review previous drafts and notes re same; email to H. Fisher (Schmidt conservator) re same
Brian Umpierre	12/9/2020	3.00	\$925.00	\$2,775.00	
Kathryn Stebner	12/10/2020	0.20	\$1,300.00	\$260.00	Discuss with B. Umpierre draft supplemental discovery responses re damages for Plaintiff Schmidt Further edits to supplemental Schmidt RDG response re damages including review notes re move in fees, medication fees
Brian Umpierre	12/10/2020	0.80	\$925.00	\$740.00	
Brian Umpierre	12/11/2020	4.30	\$925.00	\$3,977.50	Ferriew documents between the Chimid It constructs to busings a recommendation records to the miscal moderate and the construction of the construc
Brian Umpierre	12/16/2020	2.30	\$925.00	\$2,127.50	
Brian Umpierre Brian Umpierre Brian Umpierre	12/16/2020 12/16/2020 12/16/2020	1.00 0.30	\$925.00 \$925.00 \$925.00	\$2,127.50 \$925.00 \$277.50	Future desits a supplemental common Nu of responses, circulate among team for review Discovery learn call it estatus of Palmittifs' supplemental discovery responses Phone call with G. Wallace re damages discovery
Brian Umpierre	12/16/2020 12/16/2020 12/17/2020	0.30 0.40 0.30	\$925.00 \$925.00 \$1,300.00	\$277.50 \$370.00 \$390.00	Prince call with G. Wallace re dranges discovery Review M. Johnson email re combined review of assessment and staffing data Discuss result of or o-coursed meeting re supplemental discovery responses
Kathryn Stebner Brian Umpierre	12/17/2020	2.10	\$925.00	\$1,942.50	Further edits and finalize supplemental ROG responses and circulate among Team and to H. Fisher (Schmidt conservator): review docs from H. Fisher (Schmidt conservator) and email to M. Johnson and G. Wallace re production of same
Brian Umpierre	12/17/2020	0.40	\$925.00	\$370.00	Review M. Johnson response to defense email re combined review of assessment and staffing data
Kathryn Stebner	12/18/2020		\$1,300.00	\$390.00	Review B. Umplerne email re class rep successor in interest
Brian Umpierre	12/18/2020	0.30	\$925.00	\$277.50	Phone call with H. Fisher (Schmidt conservator) re Schmidt discovery responser; send same to co-counsel for service Email correspondence with G. Wallace, M. Johnson re resident move out date data for use in staffing analysis; review document requests propounded to date re same
Brian Umpierre	12/18/2020	0.70	\$925.00	\$647.50	
Brian Umpierre	12/18/2020	0.30	\$925.00	\$277.50	Emails to A. Xu re supplemental RPD response for Plaintiff Schmidt Emails with S. Colby, M. Johnson re Colby's email/hext communications with S. Stiner
Brian Umpierre	12/18/2020	0.40	\$925.00	\$370.00	
Brian Umpierre	12/18/2020	0.50	\$925.00	\$462.50	Phone call with A.Xu re successor in interest declaration for grandaughter of now-deceased class rep; internal Stebner email communications re same
Brian Umpierre	12/18/2020	0.30	\$925.00	\$277.50	Review Plaintiffs' portion of discovery letter brief seeking to compel Brooksale's production of ESI
Brian Umpierre Brian Umpierre	12/22/2020	0.40	\$925.00 \$925.00	\$370.00 \$462.50	Download and foot of M. Johnson Co. Collay emails with S. Silver on Selector server - case/fact development and discovery responses Perilew Brookfalle's portion of discovery letter brief seeking to compel Brookfale's production of ESI
					· · · · · · · · · · · · · · · · · · ·

Kathryn Stebner	12/23/2020	0.40	\$1,300.00	\$520.00	Review B. Umpierre memo re status of discovery owed and owing and going forward plan
Brian Umpierre Brian Umpierre	12/23/2020 12/31/2020	0.40	\$925.00 \$925.00	\$370.00 \$185.00	Review and comment re-mail to defense requesting status of outstanding discovery items. Review Plaintiffy portion of meet and confer letter on Biocodaldris motion to compet, email to M. Johnson re-same
Brian Umpierre	1/4/2021	0.30	\$925.00	\$277.50	Review email summary of contents of latest document production
Brian Umpierre Brian Umpierre	1/5/2021 1/11/2021	0.30 2.50	\$925.00 \$925.00	\$277.50 \$2,312.50	Spot review of contents of Brookstalin's 12/31 ESI production Email to M. Juhimon or status of documents received from Patients's conservators in response to Brookstalin's document requests and forward same
Brian Umpierre Kathryn Stebner	1/11/2021	2.50 0.50	\$925.00 \$1,300.00	\$2,312.50 \$650.00	Meet with B. Umplerre re discovery / class certification update
Brian Umpierre Brian Umpierre	1/13/2021 1/13/2021	0.50	\$925.00 \$925.00	\$462.50 \$277.50	Review email summary of discovery meet and conter re pendant data, task time info, move-in/move-out dates, and floor plans Discuss discovers value and olan pilm N. Scheiner
Brian Umpierre Brian Umpierre	1/13/2021	0.30	\$925.00	\$277.50	uiscus discovery status an pain with a subsenier literature litera
Brian Umpierre	1/20/2021 1/25/2021	0.40	\$925.00	\$370.00	Review email re current status of discovery and outstanding items / timeline
Brian Umpierre Kathryn Stebner	1/25/2021	0.40	\$925.00 \$1,300.00	\$370.00 \$390.00	Email correspondence re CA requirements for maintaining pendunt response data Review email correspondence re Los periods for different proposed subclasses Grand Control of the Control
Brian Umpierre	1/27/2021	0.30	\$925.00	\$277.50	Email to K. Slebner re class periods for different subclasses as reflected in Compilaint
Brian Umpierre Kathryn Stebner	1/28/2021 1/29/2021	0.50	\$925.00 \$1,300.00	\$462.50 \$1,170.00	Review A. Xu email and memors to Booksdake potential deponents, including indo on A. Xelhn, Executive Director at BKD Tracy Meet with B. Universities researching device deposition strategy When the Ministry of the Company of the C
Brian Umpierre	1/29/2021	0.60	\$925.00	\$555.00	Review index of documents pulled for ED depos in prep for team meeting re same
Brian Umpierre Brian Umpierre	1/29/2021 2/1/2021	0.90	\$925.00 \$925.00	\$832.50 \$462.50	Meeting with K. Sitchier re Executive Director deposition strategy Team call re depositions of defendants witnesses - strategy and assignments
Brian Umpierre	2/1/2021	2.00	\$925.00	\$1,850.00	Prepare searches for Kielnh deposition (ED at Brookskie Tracy) including custodial file and spot check for responsiveness
Brian Umpierre Brian Umpierre	2/2/2021 2/3/2021	1.00 0.20	\$925.00 \$925.00	\$925.00 \$185.00	Draft dranages interrogatories; formard same to S. Wallace for review, comment Email to M. Mannon re librich deposition and scheduling same Email to M. Mannon re librich deposition and scheduling same
Brian Umpierre	2/3/2021	0.20	\$925.00	\$277.50	crisis to Pr. Journal of Ir Committed or Section depositions and a Scienciaring Sealor. Review of drift or ROGS (Cartison Del 1) per agreement and sufficiency of same for our expert; emails to M. Johnson re same
Brian Umpierre Brian Umpierre	2/3/2021	2.00	\$925.00	\$1,850.00	Keihn deposition preparation - document review and outline
Brian Umpierre Brian Umpierre	2/3/2021 2/4/2021	0.50	\$925.00 \$925.00	\$462.50 \$370.00	Review D. Marks email re missing punch detail (lata and other payroll data issues - re understaffing analysis Email to M. Johnson re revised ROSE rebasic service fees and Responsed and Responsed residences
Brian Umpierre	2/5/2021	1.50	\$925.00	\$1,387.50	Keihn deposition preparation - document review and outline
Brian Umpierre Brian Umpierre	2/6/2021 2/8/2021	0.40 0.50	\$925.00 \$925.00	\$370.00 \$462.50	Forward to M. Johnson briefing in similar understaffing illigation on work product protection for communications and documents with/from putative class members Team call redeocitions, discovery, status:
Brian Umpierre	2/8/2021	2.50	\$925.00	\$2,312.50	Keihn deposition preparation - document review and outline
Kathryn Stebner Brian Umpierre	2/9/2021 2/9/2021	0.50 8.20	\$1,300.00 \$925.00	\$650.00 \$7,585.00	Meet with B. Umpierre re executive director depo prey fatuus Keihn deposibility on geveration - downteent review and outline
Brian Umpierre	2/10/2021	5.90	\$925.00	\$5,457.50	Keiltin deposition preparation - document review and outline
Brian Umpierre Brian Umpierre	2/11/2021 2/11/2021	3.00 0.50	\$925.00 \$925.00	\$2,775.00 \$462.50	Kelhin deposition preparation - document review and outline Review Philantify Fortion of document tereit was doutline Review Philantify Fortion of document tereit and outline Review Philantify Fortion of document tereit barried on production of site inspection photos taken by expert
Brian Umpierre	2/12/2021	3.20	\$925.00	\$2,960.00	Review Kiehn saved searches re deposition preparation
Brian Umpierre Kathryn Stebner	2/14/2021 2/15/2021	0.50	\$925.00 \$1,300.00	\$462.50 \$520.00	Review M. Johnson email to D. Marks et al. nr sufficiency of data for completion of staffing analysis and review PSP interpretive guidelines Review memor sufficiency of data for completion of staffing analysis Review memor sufficiency of data for completion of staffing analysis
Brian Umpierre	2/15/2021	2.50	\$925.00	\$2,312.50	Review Kiehn saved searches re deposition preparation
Brian Umpierre Brian Umpierre	2/16/2021 2/16/2021	4.50 0.30	\$925.00 \$925.00	\$4,162.50 \$277.50	review Sichn saved searchers er deposition preparation to the same of the same
Brian Umpierre	2/16/2021	0.30	\$925.00	\$277.50	review internal correspondence re deposition schedule strategy
Brian Umpierre Brian Umpierre	2/16/2021 2/17/2021	0.30	\$925.00 \$925.00	\$277.50 \$370.00	review Plaintiffs portion of discovery letter brief seeking to compet ED depositions team call re-deposition scheduling
Brian Umpierre	2/17/2021	0.40	\$925.00	\$370.00	team Last re deposition to Schrebung review / Comment on draft 30(b)(5) deposition notice topics
Brian Umpierre Brian Umpierre	2/17/2021 2/18/2021	2.50 0.20	\$925.00 \$925.00	\$2,312.50 \$185.00	Kiehn depozition preparation - compile hot document list review assignment for 300(()(6) deposition takers
Brian Umpierre	2/18/2021	5.40	\$925.00	\$4,995.00	Kien deposition preparation - compile hot document list including job descriptions, policies/procedures
Kathryn Stebner	2/19/2021 2/19/2021	0.50	\$1,300.00	\$650.00 \$1,572.50	meet with B. Umplerre re deposition schedule and strategy - executive directors and 30(b)(6)
Brian Umpierre Brian Umpierre	2/19/2021	1.70 7.10	\$925.00 \$925.00	\$1,572.50 \$6,567.50	Team call ite document review and 30(b)(6) deposition preparation Within depo pre-putaged search briview or Service (imperiment and policies/procedures regarding same
Brian Umpierre	2/19/2021	0.40	\$925.00	\$370.00	phone call with K. Stebner re deposition schedule and strategy - executive directors and 30(b)(6)
Kathryn Stebner Brian Umpierre	2/23/2021 2/23/2021	1.70 0.50	\$1,300.00 \$925.00	\$2,210.00 \$462.50	review draft Klein deposition outline and key documents review M. Enhance nearlist to Marker 4 is it nearly produced staffing into including Brookladle norms and benchmark calculations / standards
Brian Umpierre	2/24/2021	0.20	\$925.00	\$185.00	phone call with A. Xu re substituting deceased plaintiff
Brian Umpierre Kathryn Stebner	2/25/2021 2/26/2021	0.20	\$925.00 \$1,300.00	\$185.00 \$390.00	email to S. Colby re substituting for deceased plaintiff discuss Shink deposition preparation with B. Umplerer
Brian Umpierre	2/28/2021	0.40	\$925.00	\$370.00	review spreadsheet overview of Brookdale's document production to date
Kathryn Stebner Brian Umpierre	3/5/2021 3/5/2021	2.20 1.50	\$1,300.00 \$925.00	\$2,860.00 \$1,387.50	review revised likehi deposition outline and key documents Wehn deposition on prevantion, of comment review and until the
Brian Umpierre	3/8/2021	0.40	\$925.00	\$370.00	review Mark analysis of unique residents who require visual or mobility aids
Brian Umpierre Brian Umpierre	3/9/2021 3/10/2021	1.00 0.80	\$925.00 \$925.00	\$925.00 \$740.00	discovery meet and confer session with M. Johnson and defense re Brookdale's responses and objections to Rog Set 2
Brian Umpierre Brian Umpierre	3/10/2021	0.40	\$925.00	\$370.00	Zoon with court reporting service re upcoming deport. Team meeting or strategy/inputed for same review Palmittly sceled input itself the research presents to Carbon's ROOs; review meet and confer notes re same; email to M. Johnson re same
Brian Umpierre Brian Umpierre	3/18/2021 3/23/2021	0.40	\$925.00 \$925.00	\$370.00 \$647.50	review Atalen depo summary re Klehn deposition preparation
Brian Umpierre Brian Umpierre	3/23/2021 3/24/2021	0.70	\$925.00 \$925.00	\$647.50 \$370.00	review draft Harris deposition outline re: Kehn deposition preparation review Harris deposition southerner: Technique and the control of the
Kathryn Stebner	3/25/2021	1.60	\$1,300.00	\$2,080.00	review Atalen deposition summary and Harris deposition outline and summary notes re Kiehn/Executive Director deposition preparation
Brian Umpierre Brian Umpierre	3/25/2021 3/26/2021	0.40	\$925.00 \$925.00	\$370.00 \$370.00	review summany of pendant data subposen aresponses review G. Wallastone declaration is on Right 7.11 motion or reclass cent schedule
Brian Umpierre	3/29/2021	0.50	\$925.00	\$462.50	review M. Johnson summary of meet and confer with defense re 30(b)(6) deposition and topics
Kathryn Stebner Brian Umpierre	3/30/2021 4/2/2021	1.00 0.30	\$1,300.00 \$925.00	\$1,300.00 \$277.50	call with J. Noe (Rem County DA) re class case, experts. review Paintiff's request for discovery case management conference; email comments to M. Johnson
Brian Umpierre	4/2/2021	0.20	\$925.00	\$185.00	review correspondence re Silversphere subpoena for pendant data
Brian Umpierre Kathryn Stebner	4/2/2021 4/6/2021	0.30	\$925.00 \$1,300.00	\$277.50 \$650.00	review and comment re defense email demanding withdrawal of request for discovery case management conference review email correspondence re Painfilts' request for discovery conference, 20(s)(b)(6) depo topics, and pendant data request/responses
Brian Umpierre	4/7/2021	0.20	\$925.00	\$185.00	review A. M. email. summary of discovery meet and confer concerning orderion of pendint response data
Brian Umpierre Brian Umpierre	4/7/2021 4/9/2021	0.30 1.00	\$925.00 \$925.00	\$277.50 \$925.00	review summary of discovery meet and confer will Blookside re production of pendant response time data Go To-Meeting Will. Thornton, G. Walter, re expert discovery, staffing shorted an analysis
Brian Umpierre Brian Umpierre	4/9/2021	0.20	\$925.00	\$925.00 \$185.00	Go Oreleang with J. Inormon, G. Walace, ie expert oiscovery, starting aniorata analysis review draft A.X untest and confer orrespondence relievable draft A.X untest and confer orrespondence relievable draft A.X untest and confer orrespondence relievable size positions of pendant data
Brian Umpierre	4/9/2021	0.20	\$925.00	\$185.00	review working list of outstanding discovery
Brian Umpierre Brian Umpierre	4/10/2021 4/12/2021	0.30	\$925.00 \$925.00	\$277.50 \$555.00	review stiffing-related questions for ED depos no cross-staining. *Leichn deposition preparation review dark filters from or discovery letter for 200(b)(g) deposition and remail to N. Nizhoon er same
Brian Umpierre	4/13/2021	0.30	\$925.00	\$277.50	review draft A. Xu meet and confer correspondence re deficiencies in Brookdale's privilege logs
Kathryn Stebner Brian Umpierre	4/21/2021 4/21/2021	0.40	\$1,300.00 \$925.00	\$520.00 \$277.50	review memo to filte re status of expert discovery and staffing shortfall analysis review A. Xu emilla unumany of staffing chartfall analysis review A. Xu emilla unumany of staffin of efforts to obtain pendant response data from Brookdale
Brian Umpierre	4/21/2021	0.40	\$925.00	\$370.00	review T. Close email re outstanding discovery and potential motions to compel / areas requiring further follow up
Brian Umpierre Kathryn Stebner	4/21/2021 4/22/2021	0.40	\$925.00 \$1,300.00	\$370.00 \$390.00	review summary email nr F. Bout (ED) deposition - Kehn deposition preparation review summary email nr F. Bout (ED) deposition - Kehn deposition preparation
Brian Umpierre	4/23/2021	0.30	\$925.00	\$277.50	review Plaintiffs' 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 Kathryn Stebner	4/26/2021 4/27/2021	0.30	\$925.00 \$1,300.00	\$277.50 \$520.00	review emails to defense e the brobulatie's deficient production of emails from Brobulatie's K.E. Bownam discussion with B. Unipriere rec (IAM to PET And assisted from Jen CA - the subsquerous for the Johnson depo prep
Brian Umpierre	4/27/2021	0.50	\$925.00	\$462.50	us. cosoni win is. dirigine in er curve va mure, and asserted uning at curve in cosonic organ prop phone call with N Johnson in CVGC Va RDEF and assisted luring in Curve in edepo prep, emails with K. Steber re same
Brian Umpierre Brian Umpierre	4/27/2021 4/28/2021	0.50	\$925.00 \$925.00	\$462.50 \$277.50	email/phone call with M. Johnson re CCRC vs. At En preparation for Toomer deposition review G. Counted demail e call an exhalf or scientific subscription issue
Kathryn Stebner	4/29/2021	1.00	\$1,300.00	\$1,300.00	review to creating the report for positions associated in successful and review emails re-same.
Brian Umpierre	4/29/2021	0.50	\$925.00	\$462.50	conference call re substituting successors-in-interest for deceased plaintiffs and review emails re same
Brian Umpierre Kathryn Stebner	4/30/2021 5/1/2021	0.30 1.50	\$925.00 \$1,300.00	\$277.50 \$1,950.00	review Plaintiffs' portion of draft letter brief re production of post-April 2020 ESI/Bowman emails
Kathryn Stebner Brian Umpierre	5/1/2021 5/1/2021	0.60 2.00	\$1,300.00		review Brookdale's motion to deny class certification and supporting papers; discussion with B. Umpierre re same.
Brian Umpierre Brian Umpierre	5/1/2021			\$780.00	review Brookdale's motion to deny class certification and supporting papers; discussion with 8. Umplerer re same. review motion for substitution of deceased Ps and supporting papers; discussion with 8. Umplerer re same.
Kathryn Stebner	5/3/2021	1.00	\$925.00 \$925.00	\$780.00 \$1,850.00 \$925.00	review Possidatie's motion to deury class certification and supporting apares; discussion with BL Umpleme re same. review motion for statistation of descared and an apporting ingener, dark and apporting apares; discussion with BL Umpleme re same. review motion to deury class certification and supporting apares; review motion to deury discuss certification and supporting apares; review motion to deury discuss certification and supporting apares; review motion to deury discuss certification accession with ASI is reason.
Kathryn Stebner Brian Umpierre		1.00 0.40	\$925.00 \$925.00 \$1,300.00	\$1,850.00 \$925.00 \$520.00	review motion for substitution of decased Ps and supporting papers, discussion with 8. Unpierer se same. review Bedoublist, most one deep size succification and supporting pages review motion to deep sizes certification, discussion with IXE at same review and only sizes certification, discussion with IXE at same review under during mellinon bedny sizes certification.
Brian Umpierre	5/3/2021 5/3/2021	1.00 0.40 0.20	\$925.00 \$925.00 \$1,300.00 \$1,300.00	\$1,850.00 \$925.00 \$520.00 \$260.00	review motion for substitution of decleased Ps and supporting papers discussion with B. Umplerer es same. review Brooksides roots on dever disca certification and supporting papers review motion to devery class certification, discussion with KLS resame review under deriving motion to devery class certification, discussion with KLS resame review under deriving motion to devery class certification discuss order deriving motion to devery class certification with EL Umplerer
	5/3/2021 5/3/2021	1.00 0.40 0.20 0.30 0.40	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50 \$370.00	review motion for substitution of decisional frame planting papers, discussion with it. Unpierer ex same, review Bookshifts and on some to deep discuss certification and supporting pages; review motion to deep discuss certification, discussion with IX. All or same review under the deep discuss certification, discussion with IX. All or same review under the deep discussion development of the desire discussion with IX. All or same review under the deep discussion development of the deep deep deep discussion development of the deep deep deep deep deep deep deep de
Brian Umpierre Brian Umpierre	5/3/2021	1.00 0.40 0.20 0.30	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50	review motion for substitution of decisional frame in the process of the process
Brian Umpierre Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50 \$370.00 \$555.00 \$925.00 \$647.50	review motion for substitution of deceased Pa and supporting papers, discussion with BL Umpierre re-same. **review Behadulish** provises to deep days care fiction and supporting pages per review motion to deep values certification; discussion with MLS for same review order deningly motion to deep values certification and supporting review and review order deningly motion for deep values certification with BL Umpierre verview Order deningly motion to deep values certification with BL Umpierre verview Order deningly motion to deep values certification with BL Umpierre verview Order deningly motion to deep values certification with BL Umpierre verview Order deningly motion to deep values certification with BL Umpierre verview Order deningly motion to deep values conditionated in a value of the value of value of the value of value of value of values
Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50 \$370.00 \$555.00 \$925.00	review motion for substitution of decisional frame in the process of the process
Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021 5/6/2021 5/7/2021 5/7/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50 \$370.00 \$555.00 \$925.00 \$647.50 \$185.00 \$277.50	review motion for substitution of decisional frame gapers, discussion with & Umplerer es same. Where Mechanism's motion to deep's cass certification, ediscussion with & Mark es ame review motion to deny's cass certification, ediscussion with Mark es ame review or decide deny's motion to deny's cass certification with discuss under denying motion to deny's cass certification with discuss under denying motion to deny's cass certification with Carlos and the control of
Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Kathryn Stebner	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021 5/5/2021 5/7/2021 5/7/2021 5/10/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$520.00 \$260.00 \$277.50 \$370.00 \$555.00 \$925.00 \$647.50 \$185.00 \$555.00 \$277.50	review motion for substitution of decisional frame in the control of the control
Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021 5/5/2021 5/7/2021 5/7/2021 5/10/2021 5/10/2021 5/10/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30 0.40 0.70 0.20 0.50 0.30	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$220.00 \$260.00 \$277.50 \$377.00 \$555.00 \$925.00 \$185.00 \$555.00 \$277.50 \$647.50 \$185.00 \$277.50 \$650.00 \$277.50 \$650.00 \$1,387.50	review motion for substitution of decisional frame planting papers, discussion with it. Unplanter en same, review Bookshifts and protein the deep class certification, educacion with MLA for same review and produce of the control of
Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/4/2021 5/5/2021 5/7/2021 5/7/2021 5/10/2021 5/10/2021 5/10/2021 5/10/2021 5/10/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30 0.50 0.20 0.20 0.30	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$220.00 \$260.00 \$277.50 \$370.00 \$555.00 \$647.50 \$185.00 \$555.00 \$277.50 \$185.00 \$185.00 \$1,875.00 \$1,875.00 \$1,875.00	review motion for substitution of decisional pages, discussion with 8. Unipager en same, eventure bloodshifts price to the dept class certification and supporting pages, review motion to deny class certification, discussion with 8.6 in same discuss or disc enging motion to service, stace certification with 8.0 in same discuss ordine denyi genote to service, stace certification with 8.1 burgers review ordined design genote to service, stace certification with 8.0 integers review to discrete design genote to service, stace certification with 8.0 integers review motion and state correspondence or gloodscale stonewalling review met and control correspondence production of the states, stone brackmarks, steffing norms review visual and states correspondence production of the states, stone brackmarks, steffing norms review visual and states or glood to service design of configuration of services and stress, stone brackmarks, steffing norms review visual and states or glood to service design of configuration of services and
Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/4/2021 5/6/2022 5/7/2021 5/7/2022 5/10/2021 5/10/2021 5/10/2021 5/11/2021 5/14/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.50 0.30 0.50 0.20 0.50 0.20 0.50	\$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$220.00 \$260.00 \$277.50 \$370.00 \$555.00 \$647.50 \$185.00 \$555.00 \$185.00 \$185.00 \$277.50 \$680.00 \$1887.50 \$277.50 \$462.50	review motion for substitution of decisional frame in the control of the control
Brian Umpierre Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021 5/5/2021 5/7/2021 5/10/2021 5/10/2022 5/10/2022 5/10/2022 5/14/2022 5/14/2022 5/14/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.50 0.30 0.50 0.30 0.50 0.30 0.50 0.50 0.50 0.50 0.50 0.50 0.70 0.50	\$925.00 \$1,300.00 \$1,300.00 \$925.00	\$1,850.00 \$225.00 \$220.00 \$220.00 \$277.50 \$370.00 \$555.00 \$925.00 \$447.50 \$185.00 \$555.00 \$277.50 \$680.00 \$1,387.50 \$1,387.50 \$47.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50 \$447.50	review motion for substitution of decisional final supporting papers, discussion with BL Unipierre re-same. Investive Booksidiar since the deep dissi confliction and supporting papers, review motion to deny class certification, discussion with ML dire same review and the deny dissi confliction, discussion with ML dire same review rate denying motion to deny class certification with L Unipierre discuss sold denying motion to deny class certification with L Unipierre discuss sold denying motion to deny class certification with L Unipierre review meet and confliction of the denyi den
Brian Umpierre	5/3/2021 5/3/2021 5/4/2021 5/4/2021 5/5/2021 5/5/2021 5/7/2021 5/10/2021 5/10/2022 5/10/2022 5/10/2022 5/14/2022 5/14/2021 5/14/2021 5/14/2021 5/14/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30 0.50 0.20 1.50 0.30 0.70 0.70 0.40 0.40 0.40	\$9.75.00 \$3,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$225.00 \$220.00 \$277.50 \$377.00 \$377.00 \$555.00 \$975.00 \$647.50 \$685.00 \$555.00 \$687.50 \$685.00 \$185.00 \$185.00 \$186.00 \$187.50 \$487	review motion for substitution of decisional Francisco with M. Empirere re-same, review broatches from the decision of succession with M. Empirere re-same, review broatches from the decision of succession with M. Empirere review motion to demy class certification, efficiaction with M. Empirere review or decision of succession of the M. Empirere review of the decision of succession of the M. Empirere review of the decision of succession of the decision with B. Uniquere review of the decision of succession of succession of the decision of
Brian Umpierre	5/3/2021 5/4/2021 5/4/2021 5/4/2021 5/5/2021 5/5/2021 5/7/2021 5/7/2021 5/10/2021 5/10/2021 5/10/2021 5/10/2021 5/14/2021 5/14/2021 5/14/2021 5/14/2021 5/14/2021 5/14/2021 5/14/2021 5/14/2021	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30 0.50 0.30 0.50 0.20 0.50 0.30 0.70 0.40 0.40 0.40 0.40 0.30 0.20	\$925.00 \$1,200.00 \$1,200.00 \$1,200.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$925.00 \$200.00 \$200.00 \$277.50 \$3770.00 \$925.00 \$9275.00 \$925.00 \$185.00 \$277.50 \$185.00 \$185.00 \$277.50 \$447.50 \$185.00 \$277.50 \$447.50 \$377.00 \$377.00 \$377.00 \$377.00 \$377.00 \$377.00 \$377.50	review motion for substitution of decisional Fast disappointing papers, discussion with BL Uniparer en same. Invelve Bookshifts and store to deep class certification and supposing papers, review motion to deep class certification, discussion with AL data same review and designing motion to deep class certification review motion and designing motion to deep class certification review the Althorists discovery met and content correspondence re production of six times, but present review of Outside diverging motion to deep class certification review motion and discovery met and content correspondence re production of six times, but prescribed review motion and discovery met and content correspondence re production of six times, but prescribed review motion and diverging letter of decreas certification review motion and diverging letter of decreas certification review motion and diverging letter of decreas certification devial and review motion and diverging letter of decreas certification devial and review motion and diverging letter of decreas certification devial and review motion and diverging letter of decrease certification devial and review motion and devial believe from the content of the content o
Brian Umpierre	\$1,00021 \$4,40021 \$4,40021 \$5,40021 \$5,00021 \$5,00021 \$7,70021 \$1,000021 \$1,	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.60 0.30 0.50 0.20 1.50 0.30 0.70 0.70 0.40 0.40 0.40	\$9.75.00 \$3,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$1,850.00 \$220.00 \$220.00 \$277.50 \$377.00 \$377.00 \$555.00 \$975.00 \$647.50 \$685.00 \$555.00 \$647.50 \$685.00 \$185.00 \$185.00 \$186.00 \$187.50 \$487	review motion for substitution of decisional Flash disappoint in general circuits on with it. Uniporer en same. In view Bookshaft in a motion to deep class certification, educacion with M.A. for same energy and control of the deep class certification, educacion with M.A. for same energy and control of the energy disable in the
Bana Umpierre	\$0,00021 \$4,40021 \$4,40021 \$6,40021 \$6,60021 \$7,70021 \$7,70021 \$10,00021 \$10,00021 \$11,00021 \$14	1.00 0.40 0.20 0.30 0.40 0.60 1.00 0.70 0.20 0.80 0.30 0.30 0.30 0.30 0.30 0.30 0.3	\$925.00 \$1,200.00 \$1,200.00 \$1,200.00 \$1,200.00 \$925.00	\$1,800,00 \$500,00 \$500,00 \$500,00 \$277,50 \$277,50 \$555,00 \$555,00 \$555,00 \$555,00 \$555,00 \$555,00 \$555,00 \$555,00 \$557,50	review bookshifts with officessed Plan of supporting papers, discussion with B. Unipriere re-same. Invelve Bookshifts with once to deep class certification and supporting papers, proview review bookshifts with the province of the provinc
Brian Umpierre	\$1,00021 \$4,40021 \$4,40021 \$5,40021 \$5,00021 \$5,00021 \$7,70021 \$1,000021 \$1,	1.00 0.40 0.20 0.30 0.40 0.80 1.00 0.70 0.20 0.80 0.30 0.50 0.30 0.50 0.30 0.70 0.50 0.30 0.70 0.50 0.30 0.70 0.50 0.30 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.7	\$925.00 \$1,200.00 \$1,200.00 \$1,200.00 \$925.00	\$1,850.00 \$50.00 \$50.00 \$50.00 \$20.00 \$277.50 \$377.00 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$555.50 \$557.70 \$555.50 \$557.70 \$555.50 \$557.70 \$555.50 \$557.70 \$555.50 \$577.70 \$555.70 \$577.70	review brookship is decisional for substitution of decisional fraging papers, discussion with BL Uniparer in summer. In view Brookship is stored to deep class certification, discussion with ML and summer control to deep class certification, discussion with ML and summer control to deep class certification, discussion with ML and summer control to deep class certification. In view of the decision of the decision of the control decisi
Bana Umpierre	\$1,70021 \$4,47001 \$4,47001 \$4,47001 \$5,47001 \$5,47001 \$5,77001 \$5,	1.00 0.46 0.20 0.30 0.46 0.66 0.66 0.67 0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.3	\$9225.00 \$1,200.00 \$1,200.00 \$9225.00	\$1,800.00 \$520.00 \$520.00 \$520.00 \$277.50 \$277.50 \$555.50 \$555.50 \$555.50 \$567.50 \$555.50 \$567.50 \$555.50 \$567.50 \$555.50 \$557.50 \$555.50 \$5277.50 \$5187.50	review motion for substitution of decision of part of supporting papers, discussion with BL Uniparer en same, review brookshifts in price to the dept class certification, effectacion with KL for same decision of the deep class certification, effectacion with KL for same decision of the deep class certification, effectacion with KL for same decision of the deep class certification with BL Uniparer review of the decision of the complete composition of the class certification with BL Uniparer review of the decision of the complete composition of the class certification with BL Uniparer review of the decision of the complete composition of the data free, blood benchmarks review. H. Libration decision with the Class certification with BL Uniparer review of the data free composition of the data free, blood benchmarks, stiffing comms review of the data free composition of the data free, blood benchmarks and certification of the composition of the data free, blood benchmarks review of the data free composition of the data free, blood benchmarks review of the data free composition of the complete contraction review of the data free composition of the complete contraction review of the data free composition of the complete contraction review of the data free contracting decovery and benchmarks of the composition of the complete contraction of the composition of the com
Brian Umpierre	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$6,000	1.00 0.44 0.20 0.30 0.44 0.66 0.66 0.70 0.70 0.70 0.70 0.86 0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.3	\$9225.00 \$1,200.00 \$1,200.00 \$9225.00	\$1,850.00 \$520.00 \$520.00 \$520.00 \$520.00 \$527.50 \$5370.00 \$527.50 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5370.00	review bookshifts in decisional for substitution of decisional Fast supporting papers, discussion with BL Uniparer es same, view bookshifts with come to deep discuss certification and supporting papers, estimated by the support of the decision of the dec
Brank Umpierre Brank	\$1,00021 \$4,470021 \$4,470021 \$5,470021 \$5,00021 \$5,00021 \$7,70021 \$7,70021 \$1,100021	1.00 0.46 0.20 0.30 0.46 0.60 1.00 0.70 0.30 0.40 0.70 0.30 0.30 0.70 0.30 0.30 0.70 0.30 0.40 0.40 0.40 0.40 0.40 0.40 0.50 0.5	\$922.5.00 \$1,200.00 \$1,200.00 \$21,200.00 \$9225.00	\$1,850.00 \$50.00 \$50.00 \$50.00 \$50.00 \$50.00 \$207.50 \$207.50 \$50.	review broadchaff some deceased Ps and supporting papers, discussion with BL Uniparer en same. Invelow Broadchaff some to the deep class creditation and supporting papers, review motion to deep class creditation, discussion with AL des same review and designing and/orthor soleny class creditation review and control correspondence as production of sax times, but preview review All buttors descripted and control sate free, soleny and review and review and review and control correspondence as production of sax times, staffing comes review with BL Blein Schin and W. Blein credit enterplace and review and review and soleny and the BLein Schin and with BLein Schin Schin and with BLein Schin and with BLein Schin Schi
Brian Umpierre	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$6,000	1.00 0.44 0.20 0.30 0.44 0.66 0.66 0.70 0.70 0.70 0.70 0.86 0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.3	\$9225.00 \$1,200.00 \$1,200.00 \$9225.00	\$1,850.00 \$520.00 \$520.00 \$520.00 \$520.00 \$527.50 \$5370.00 \$527.50 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5350.00 \$5370.00	review bookship is in checkens of Pan disappointing papers, discussion with BL Uniparer ex same. In view Bookship is the checkens of security of the Common
Bank Umpierre Brank U	\$1,00021 \$4,40001 \$4,40001 \$4,40001 \$4,40001 \$4,40001 \$5,70001 \$7,70001 \$7,70001 \$1,000001 \$1,000	1.00 0.40 0.20 0.30 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$922.5.00 \$1,100.00 \$1,100.00 \$1,100.00 \$922.5.00	\$1,850,00 \$507,00 \$507,00 \$507,00 \$507,00 \$277,30 \$507,00 \$507	review bookship is the responsible to decision of a successful page pages. discussion with BL Uniperer in summer with the design and the summer summer with the summer sum
Bana Umpierre Ba	9/1/2021 94/2021 94/2021 94/2021 94/2021 94/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2021 95/2022 95/2022 95/2022 95/2022 95/2022 95/2022 95/2022 95/2022	1.00 0.46 0.20 0.30 0.46 0.66 0.60 0.70 0.20 0.20 0.20 0.20 0.20 0.20 0.2	\$922.5.00 \$1,100.00 \$1,100.00 \$21,200.00 \$9225.00	\$1,850.00 \$520.00 \$520.00 \$520.00 \$5277.50 \$5277.50 \$550.00 \$5	review motion for substitution of decision of part of supporting papers, discussion with BL Uniporter es same, review motion the dray class certification, discussion with ML six same discussed of self-indication, discussion with ML six same discussed of self-indication with ML six same discuss
Bank Umpierre	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$5,000	1.00 0.40 0.20 0.30 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0.5	9072.00 \$1,100.0	\$1,850.00 \$507.00 \$507.00 \$507.00 \$507.00 \$507.00 \$507.70 \$507	review bookshift story decision of the decision of an adaption of pages. review review to the decision of the decision of the decision of a security of the decision of the d
Bank Umpierre	\$1,00021 \$4,47021 \$4,47021 \$5,47021 \$5,47021 \$5,47021 \$5,70021 \$7,70021 \$7,70021 \$1,170021	1.00 0.40 0.20 0.20 0.20 0.40 0.60 0.60 0.60 0.60 0.20 0.60 0.20 0.60 0.20 0.2	\$922.00 \$1.300.00 \$1.300.00 \$1.300.00 \$922.00	\$1,850.00 \$507	review Poolschilds Frost Centeral Control Cont
Bana Umpierre	\$1,70021 \$4,47001 \$4,47001 \$4,47001 \$4,47001 \$5,47001 \$5,77001	1.00 0.40 0.20 0.30 0.40 0.50 0.60 0.50 0.50 0.50 0.50 0.50 0.5	\$922.500 \$31,200.200 \$31,200.200 \$31,200.200 \$31,200.200 \$31,200.200 \$30,200.2	\$1,850.00 \$500	review bootshift is rice decased Ps and supporting papers, discussion with IL Uniporter re-same. Inceive Bootshift is rice to the dep class certification, ediscussion with IL Uniporter Inceive Bootshift is rice to the dep class certification, ediscussion with IL Uniporter Inceive Bootshift is rice to the dep class certification, ediscussion with IL Uniporter Inceive Bootshift is rice and i
Bank Umpierre Brank U	\$1,00021 \$4,00021 \$4,00021 \$4,00021 \$4,00021 \$5,	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.60 0.60 0.60 0.50 0.50 0.50 0.5	\$922.00 \$1.300.0	\$1,850.00 \$507	review bookship is their responsible to developate can feel the control of the co
Bank Umpierre Brank U	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$5,000	1.00 0.40 0.20 0.30 0.40 0.60 0.70 0.50 0.60 0.60 0.70 0.50 0.60 0.70 0.50 0.60 0.70 0.50 0.70 0.50 0.70 0.50 0.70 0.7	\$922.00 \$1,100.0	\$1,850.00 \$507	review broadcast review and control correspondence in control and supporting pages. review broadcast review and control in deep vacas control control and supporting pages. review motion to deep vacas control control and supporting pages. review motion to deep vacas control control control and supporting pages. review motion to deep vacas control control control and supporting pages. review motion to deep vacas control control control control control and supporting pages. review motion deep vacas control con
Bana Umpierre Ba	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$5,000	1.00 0.40 0.30 0.30 0.40 0.40 0.50 0.40 0.40 0.40 0.40 0.4	\$922.00 \$3.1,000.00 \$3.1,000.00 \$3.1,000.00 \$3.1,000.00 \$3.1,000.00 \$402.1,00 \$402.1,00 \$402.1,00 \$402.1,00 \$402.1,00 \$402.1,00 \$402.2,0	\$1,850.00 \$5070.00 \$5	review brookship is an decisional for an individual of decisional fragility and provided to the product are further control and supporting papers, discussion with ML site same discussion with ML site same discussional for an individual for an ino
Bank Umpierre Ba	\$1,00021 \$4,00021 \$4,00021 \$4,00021 \$4,00021 \$4,00021 \$5,	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.40 0.40 0.50 0.50 0.5	\$922.00 \$1.300.0	\$1,850.00 \$507	review motion for substitution of decisional Fra and supporting papers. Increview blookship is the production and daugeorized papers review motion the disprication and control and decisional papers review motion the disprication and control and decisional papers review motion the disprication and control and the papers review motion the disprication and support and control and the papers review for disprication and support and control and the papers review for disprication and support and control and the papers review motion and discoveryment and control correspondence re production of the attempts, stiffing comes review work motion and discoveryment and control correspondence reproduction of the attempts, stiffing comes review work motion and control and the and
Bana Umpierre Ba	\$1,70021 \$4,47001 \$4,47001 \$4,47001 \$4,47001 \$5,47001 \$5,77001	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.50 0.40 0.50 0.50 0.5	\$922.00 \$3.1,000.20 \$3.1,000.20 \$3.1,000.20 \$3.1,000.20 \$3.1,000.20 \$3.2,00 \$3	\$1,850.00 \$50.00	review bookshift with or decisional from an disposition general, discussion with M. Europer en same, review bookshift with or place of temporal control and supporting pages. I review bookshift with the production of decisional discussion with M. But same discussed entire support gains control and supporting pages. I review bookshift with the production of survival and street, but per entire review of bookshift with the production of the p
Bank Umpierre Ba	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$6,000	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.40 0.40 0.50 0.50 0.5	\$922.00 \$1.300.0	\$1,850.00 \$507	review bookshaft store to deep class careful passer, discussion with Libropiere resume. Invelow Bookshaft protection to deep class carefulcation, discussion with Libropiere review on the discipance review on the discipance review on the discipance review of the discipance review on the discipance review on the discipance review of the discipance review or the discipance representation of the discipance representation of the discipance representation of the discipance review or the discipance representation of the discipance review or the d
Bank Umpierre	\$1,70021 \$4,470021 \$4,470021 \$4,470021 \$4,470021 \$5,470021 \$5,470021 \$5,7700	1.00 0.40 0.20 0.30 0.40 0.60 0.70 0.50 0.60 0.60 0.50 0.50 0.50 0.50 0.5	\$922.00 \$1,100,100 \$1,	\$1,850.00 \$507	review motion for substitution of decision of part discontinuous motion of the substitution of decision of the substitution of the sub
Bana Umpierre	\$1,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$4,0001 \$6,000	1.00 0.40 0.30 0.30 0.40 0.40 0.40 0.40 0	\$922.00 \$3.100.00	\$1,850.00 \$50.00	review bookship is not decisionally on decisional for substitution of decisional from the depot state certification and supporting pages. review motion the deep classic certification, decisional value of the substitution of the decisional certification with St. Uniquere review of bookship with professional certification with St. Uniquere review of bookship with professional certification with St. Uniquere review of bookship decisional certification with St. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of review of review of the review of the st. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of review of review of the st. Uniquere review of bookship decision of
Bank Umpierre Ba	\$1,00021 \$4,00021 \$4,00021 \$4,00021 \$4,00021 \$4,00021 \$5,	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.40 0.40 0.40 0.40 0.4	\$922.00 \$1,300.0	\$1,850.00 \$507	review books the scheduled on deceased Ps and supporting papers, discostant with B. Unpriere e same, review books the review
Bank Umpierre Brank U	\$1,70021 \$4,47001 \$4,47001 \$4,47001 \$4,47001 \$5,47001 \$5,77001 \$5,	1.00 0.40 0.20 0.30 0.40 0.40 0.50 0.40 0.40 0.40 0.40 0.4	\$922.00 \$3.1200.20 \$3.1200.20 \$3.1200.20 \$3.1200.20 \$4.	\$1,850.00 \$50.00	review broads for substitution of decased Ps and supporting papers, discussion with B. Umpierre et zeme. Increw Broads for motion to leany data certification and supporting against process which the discuss certification (activation and supporting against process which the discuss certification (activation and supporting against process aga
Bana Umpierre Ba	\$1,70021 \$4,47021 \$4,47021 \$4,47021 \$4,47021 \$5,47021 \$5,77021	1.00 0.40 0.30 0.30 0.40 0.40 0.40 0.40 0	\$922.00 \$3.100.00	\$1,850.00 \$50.000 \$50.000 \$50.00000 \$50.00000 \$50.00000 \$50.00000 \$50.000000 \$50.0000000000	review blookable in some to deep date cancers of a set deep conting papers, discossion with 18. Unprierre et ame. Inverview blookable in some to deep date certification, education with 18. Unprierre review or solder in some to deep date certification, education with 18. Unprierre review of book direct grant of the certification with 18. Unprierre review of book during motion to day visas certification with 18. Unprierre review of book during motion to day visas certification with 18. Unprierre review of book during motion to day visas certification with 18. Unprierre review of book during motion to day visas certification with 18. Unprierre review of book during motion to day visas certification with 18. Unprierre review of the day of the certification of the 18. White the certification with 18. Unprierre review of the 18. White the certification with 18. Unprierre review of the 18. White the certification with 18. Unprierre review of the 18. White the

Kathryn Stebner	6/15/2021	0.50	\$1,300.00	\$650.00	phone call with B. Umplerne re further documentation evidencing Brookdale's ownership, operation of RCFEs and designee's further testimony on additional topics
Brian Umpierre Brian Umpierre	6/15/2021 6/15/2021	0.30	\$925.00 \$925.00	\$277.50 \$370.00	email to US Legal ordering expedited 30(b)(6) to pic 2 (own/operatur) deposition transcript review J. Veillum memor econversation with former Excessive Direction Excessive Steel Baster leads to the steel of the steel of the steel of the steel of the steel steel steel steel the steel of the steel of t
Brian Umpierre	6/15/2021 6/17/2021	0.20	\$925.00 \$925.00	\$185.00 \$370.00	review meet and confer letter to defense addressing outstanding discovery review meet and confer letter to defense addressing outstanding discovery review eards surrounary of 20(t)(e) description logic 1 0
Brian Umpierre Brian Umpierre	6/17/2021 6/18/2021	0.40	\$925.00 \$925.00	\$370.00 \$277.50	email to B. Bien-Kahn attaching class representative declarations submitted in similar understaffing case to support motion for class certification
Brian Umpierre Brian Umpierre	6/25/2021 7/12/2021	0.40	\$925.00 \$925.00	\$370.00 \$185.00	review summary of today's discovery meet and confer re production of performance review/corrective actions; operations plans; personnel reports; ownership/management, move-in/move-out and assessment data; labor detail reports; Rubin depo; 2000 ESI; pendant data email to 1. Heli re supporting class certification declarations from Plantifif Rubin Schmidt's conservation.
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 Brian Umpierre	7/13/2021 7/13/2021	0.40	\$925.00 \$925.00	\$370.00 \$277.50	emil to A. Xu re class representative declarations supporting motion for class certification and contents thereof emil to team stabuling exemples inter requesting resident filt for mRCFs. 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 Stebner Brian Umpierre	7/21/2021 7/21/2021	0.30	\$1,300.00 \$925.00	\$390.00 \$277.50	review email correspondence re production of product data and use in staffing analysis review A. use mail ir meeting with D. Ardas. J. Thornton revoluction of neodant data and use in staffing analysis review A. use mail ir meeting with D. Ardas. J. Thornton revoluction of neodant data and use in staffing analysis
Kathryn Stebner	7/28/2021	1.60	\$1,300.00	\$2,080.00	review draft class representative declarations in support of class certification
Brian Umpierre Brian Umpierre	7/28/2021 7/30/2021	0.10	\$925.00 \$925.00	\$92.50 \$92.50	email to G. Wallace re Plantiff R. Schmidt 5 disabilities amali to J. Vallece re Plantiff Schmidt statistication amali to J. Vallece re Plantiff Schmidt statistication class representative declarations in support of class certification
Brian Umpierre	8/2/2021	0.20	\$925.00	\$185.00	email to M. Gallagher (former conservator) re declaration as R. Schmidt's former conservator in support of motion for class certification
Kathryn Stebner Brian Umpierre	8/3/2021 8/3/2021	1.80 0.30	\$1,300.00 \$925.00	\$2,340.00 \$277.50	review Bowman 30(b)(6) Estimony, discuss ownership/operations testimony with C. Lee. Hutther emils with M. Gallisgher reductation as R. Exhibition of the control of the co
Brian Umpierre	8/3/2021	0.50	\$925.00	\$462.50	excerpt Bowman 30(b)(6) testimony on Brookdate ownership, operations control, and forward same to K. Stebner
Brian Umpierre Kathryn Stebner	8/3/2021 8/4/2021	7.50 1.10	\$925.00 \$1,300.00	\$6,937.50 \$1,430.00	dath H. Fisher declaration (if Schmidt conservation in support of motion for class certification review mail re-condensatility of Sevent and 30((s)) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent and 30((s))) in stemper (sever wall re-condensatility of Sevent wall re-condensati
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 Brian Umpierre	8/4/2021 8/4/2021	0.70	\$925.00 \$925.00	\$647.50 \$277.50	team meeting re status, update, and class certification multiple (September 2014) (ed.) (e
Brian Umpierre	8/4/2021	4.00	\$925.00	\$3,700.00	draft M. Gallagher declaration (R. Schmidt former conservator) in support of motion for tasks certification
Kathryn Stebner Kathryn Stebner	8/5/2021 8/5/2021	0.30	\$1,300.00 \$1,300.00	\$390.00	discussion with B. Umpirer re conversations with C. Lee re ownership, control issues discussion with B. Umpirer re re sinch of class certification preparations and related assignments
Kathryn Stebner	8/5/2021	0.70	\$1,300.00	\$910.00	review draft Stebner declaration iso motion for class certification; phone call with B. Umpierre re same.
Brian Umpierre Brian Umpierre	8/5/2021 8/5/2021	1.80 2.30	\$925.00 \$925.00	\$1,665.00 \$2,127.50	draft M. Gallagher declaration (R. Schmidt former conservator) in support of motion for class certification, bravand same for review/comment draft M. Stellander declaration in support of motion for class certification; forward same for review/comment draft M. Stellander declaration in support of motion for for last certification; forward to X. Stellant for review/comment draft M. Stellander declaration in support of motion for for last certification; forward to X. Stellant for review/comment draft M. Stellander declaration in support of motion for forward certification; forward same for review/comment draft M. Stellander declaration in support of motion for forward certification; forward same for review/comment draft M. Stellander declaration in support of motion for forward certification; forward same for review/comment draft M. Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in support of motion for forward or in Stellander declaration in Stellander decla
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 under staffing case
Brian Umpierre Brian Umpierre	8/11/2021 8/11/2021	0.50 6.80	\$925.00 \$925.00	\$462.50 \$6.290.00	team call er status, update, clars certification review disability access exert resorts - del barrier (lats
Kathryn Stebner	8/12/2021	0.60	\$1,300.00	\$780.00	review revised Stebner declaration iso motion for class certification; discussion with B. Umpierre re same.
Brian Umpierre Brian Umpierre	8/12/2021 8/12/2021	7.50 0.10	\$925.00 \$925.00	\$6,937.50 \$92.50	review disability access oper reports - edit burier lists; emais with J. Valliu, and experts G. Walter, and J. Mastin re same mani lot S. Beheven attability access oper at produce in a data Potter development of the control of the
Kathryn Stebner	8/13/2021	0.40	\$1,300.00	\$520.00	review Stebner declaration edits; discussion with B. Umpierre re same.
Brian Umpierre Brian Umpierre	8/13/2021 8/13/2021	0.80	\$925.00 \$925.00	\$740.00 \$277.50	further edits to Fisher (Schmidt conservator) declaration; email to 1 Fisher attaching same and scheduling call to review and discuss email to 1. Schemier or Schemict conservator) declaration; email to 1 Fisher attaching same and scheduling call to review and discuss email to 1. Schemier or Schemict Conservation decision code:
Brian Umpierre	8/13/2021	0.30	\$925.00	\$277.50	email to A. Securier to a tension tectularium tectular
Brian Umpierre Brian Umpierre	8/13/2021 8/13/2021	8.80 1.60	\$925.00 \$925.00	\$8,140.00 \$1,480.00	review disability access sepert reports - edit barrier lists; emails with J. Viellin and seperts G. Waters and J. Mastin re same review and edits to draft of class conficiention brief and supporting G. Walking- declaration
Brian Umpierre Brian Umpierre	8/13/2021 8/13/2021	1.00	\$925.00	\$925.00	review and exists to drart or classe cermication after and supporting to, wailable deciatation team call for exacts certified and supporting to, wailable deciatation team call for exacts certifiling status and logistics.
Brian Umpierre Brian Umpierre	8/14/2021 8/14/2021	0.70 5.20	\$925.00 \$925.00	\$647.50 \$4,810.00	email correspondence and plane call with H. Fibhr (Schmid conservator) re class cert declaration; finalize same review Plantifity disability access part proptors - cell brainer lists
Brian Umpierre	8/16/2021	0.30	\$925.00	\$277.50	forward executed Fisher (Schmidt conservator) and Stebner declarations supporting motion for class certification to co-counsel for filing
Brian Umpierre Brian Umpierre	8/16/2021 8/16/2021	1.40 1.50	\$925.00 \$925.00	\$1,295.00 \$1,387.50	proposed reductions to Plaintiffs' experts Cross and Kalles class certification declarations; forward same to A. Xu
Brian Umpierre	8/16/2021	1.10	\$925.00	\$1,017.50	proposed reductions to Plainiffs open't Schroyer's class certification declaration; broward same to A. Xu proposed medications to Plainiffs open't Floor's class certification declaration; broward same to B. Bien Kalm for the Control of the Contro
Kathryn Stebner Brian Umpierre	8/17/2021 8/17/2021	3.00 1.30	\$1,300.00 \$925.00	\$3,900.00 \$1,202.50	review memorandum is un militor for class certification and supporting stalling declarations, discussion with B, Umpierre re same, proposed medication to Psilaritif Sendage seport Kennerig Sectionation in support of class certifications of class certifications, grant of class certifications are made to Assure same.
Kathryn Stebner	8/17/2021	0.70	\$1,300.00	\$1,202.50	discuss strengths and weaknesses of class certification submission with B. Umplerre
Brian Umpierre	8/18/2021 8/18/2021	0.70	\$925.00 \$925.00	\$647.50 \$462.50	discuss strengths and weaknesses of class certification submission with S. Debner edits to G. Willacce class criteriation declaration; forward De. Bert Ashn
Brian Umpierre Brian Umpierre	8/18/2021 8/25/2021	0.50	\$925.00 \$925.00	\$462.50 \$277.50	edits G. Wallace class certification declaration; forward to B. Ben-Ashn relies and the control of the control
Brian Umpierre Kathryn Stehner	8/26/2021	0.90	\$925.00	\$832.50	email correspondence with G. Wallace, B. Steper no obtaining decisanal resident files; statutory authority and subtorizations for records; provard exemplar requests, severe correspondence not also no brotation crises control into decisant resident files; statutory authority and outlook and only control into the
Kathryn Stebner Brian Umpierre	8/31/2021 8/31/2021	0.40	\$1,300.00 \$925.00	\$520.00 \$740.00	review correspondence or plan to obtain class certification declarant resident tiles in connection with class certification and discovery emails with C. Wallace, M. Johnson or requesting discount resident tiles in connection with class certification and discovery emails with C. Wallace, M. Johnson or requesting discount resident tiles and attaching document requests from similar understalling 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 Brian Umpierre	9/10/2021 9/15/2021	0.80	\$925.00 \$925.00	\$740.00 \$462.50	tetephonic discovery meet and confer with M, Johnson ne production of declarant resident filles and pre-call discussion with M, Johnson re same emails with D, Tanks attaching document requests and Johnson meeting of the production of expert materials the
Brian Umpierre	9/20/2021	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 understaffing case re same
Brian Umpierre Brian Umpierre	9/21/2021 9/21/2021	0.70	\$925.00 \$925.00	\$647.50 \$370.00	emails with M. Johnson re request for production of MOD files used in staffing analysis software and potential confidentially issues phone call with N. Oklabca and M. Johnson re Revokabler spreages for production of MOD followskips files used in staffing analysis software and practice in similar understaffing cases
Brian Umpierre	9/21/2021	0.50	\$925.00	\$462.50	review meet and confer letter re deposition errata
Brian Umpierre Kathryn Stebner	9/21/2021 9/24/2021	0.40	\$925.00 \$1.300.00	\$370.00 \$390.00	emails with H. Fisher (Filamitif Schmidt conservator) ne deposition availability and protocol review memor set 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 Brian Umpierre	9/24/2021 9/27/2021	0.30 1.50	\$925.00 \$925.00	\$277.50 \$1,387.50	upload and provide link to team of Brooklatide insurance policies produced in Jan 2020 emils land planne call with A. Nur. 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 understaffing litigation
Brian Umpierre Brian Umpierre	9/30/2021	0.20	\$925.00 \$925.00	\$185.00 \$370.00	email to J. Yellin re H. Fisher (Plantiff Schmidt's conservator) deposition availability (dates) browned staffing growt whenes declarations submitted in similar understaffing ligitation in referral court to O. Wallace
Kathryn Stebner	10/4/2021	0.30	\$1,300.00	\$390.00	review draft stipulation on class certification briefing schedule
Brian Umpierre Brian Umpierre	10/4/2021 10/5/2021	0.40	\$925.00 \$925.00	\$370.00 \$185.00	review class cert birding/ischeduling dipulation email correspondence with F. History Plantiff Schmidt consensator) 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 sevice plan data; email to M. Johnson re same
Brian Umpierre Kathryn Stebner	10/7/2021 10/8/2021	3.40 0.50	\$925.00 \$1,300.00	\$3,145.00 \$650.00	H. Fisher (Plantiff Schmidt conservation) deposition preparation - compile relevant documents and review; prepare deposition invited meet with EL (Implier re plantiff schmidt projection preparation - compiler relevant documents and review; prepare deposition prepared active involved and statistic or projection for or greater resident assessment data for staffing analysis
Brian Umpierre	10/8/2021	3.70	\$925.00	\$3,422.50	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - binder/review documents
Brian Umpierre Brian Umpierre	10/8/2021 10/8/2021	0.50	\$925.00 \$925.00	\$462.50 \$925.00	discussion with K. Steben er Fisher (Schmidt conservator) deposition preparation and schedule and status of production of complete resident assessment data for staffing analysis team call restribute, guidate, data secretification
Brian Umpierre	10/8/2021	3.00	\$925.00	\$2,775.00	pull good defense deposition questions for class representatives for class representative deposition preparation and forward to G. Wallace
Brian Umpierre Brian Umpierre	10/11/2021 10/11/2021	6.50 0.30	\$925.00 \$925.00	\$6,012.50 \$277.50	H. Fisher (Plantiff Schmidt conservator) deposition preparation - draft Yough questions for prep: continue doc review/binder preparation review admin monitor or additional time on population to class certification.
Brian Umpierre	10/12/2021	6.90	\$925.00	\$6,382.50	H. Fisher (Plaintiff Schmidt conservator) deposition preparation - draft 'tough' questions for prep; continue doc review/binder preparation
Brian Umpierre Brian Umpierre	10/15/2021 10/15/2021	4.50 0.80	\$925.00 \$925.00	\$4,162.50 \$740.00	H. Fisher (Planniff Schmids conservator) deposition preparation - draft "hough" questions for prey; continue doc reviewbrinder preparation. Box and send to H. Fisher review draft opposition to motion to set reset the read with L. Annieron sequent for the control of the contro
Brian Umpierre	10/15/2021	0.40	\$925.00	\$370.00	review meet and confer correspondence re Plaintiffs' production of MOD/package files used in staffing analysis software
Kathryn Stebner Brian Umpierre	10/18/2021 10/18/2021	1.80 0.30	\$1,300.00 \$925.00	\$2,340.00 \$277.50	review draft Fischer (Schmidt consensator) deposition outline phone call with Johnson, O. Natis, J. Inervitors reproduction of WIOD/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 Kathryn Stebner	10/27/2021 10/28/2021	0.20	\$925.00 \$1,300.00	\$185.00 \$390.00	review correspondence re Plaintiff 's/cass representative deposition scheduling discuss Paintiff 'deposition scheduling discuss Paintiff 'deposition scheduling with 80. Implienter discuss Paintiff 'deposition scheduling 'deposition scheduling' discuss Paintiff 'deposition scheduling' disc
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 Stebner Kathryn Stebner	11/1/2021 11/1/2021	0.40	\$1,300.00 \$1,300.00	\$520.00 \$260.00	review discovery order re production of unprotected package files for class cert staffing analysis; discussion with B. Umpierre re same. discuss with B. Umpierre discovery order re production of unprotected package files and import for class cert staffing analysis discuss with B. Umpierre discovery order re production of unprotected 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 comel facility management agreements
Brian Umpierre Brian Umpierre	11/1/2021 11/1/2021	0.40 1.00	\$925.00 \$925.00	\$370.00 \$925.00	review discovery order re production of unprotected package MOD files; email to K. Stebane re same email to M. Johnson e meet and confer call it is fall. Produced in the common stem of the common stem or
Brian Umpierre	11/2/2021	0.40	\$925.00	\$370.00	email correspondence with J. Yellin, H. Fisher (Plaintiff Schmidt conservator) redeposition scheduling
Brian Umpierre Kathryn Stebner	11/4/2021 11/5/2021	0.40	\$925.00 \$1,300.00	\$370.00 \$780.00	review meet and confer correspondence re Plaintiffs' motion to compet facility management agreements; email to M. Johnson re same review BL Uniquier email and discuss re Florer subponent, and reresponse; pessing class cert related materials.
Brian Umpierre	11/5/2021	1.00	\$925.00	\$925.00	telephonic meet and confer re Plaintiffs' motion to compet facility managements agreements, etc. with M. Johnson
Brian Umpierre Brian Umpierre	11/5/2021 11/5/2021	0.70 1.40	\$925.00 \$925.00	\$647.50 \$1,295.00	review Marks/Thomton audit re assessment data production and missing information legal research re responding to PFO 49 subpowers - service, objections, quastly, thing
Brian Umpierre Brian Umpierre	11/5/2021	0.80	\$925.00 \$925.00	\$740.00 \$277.50	phone call with M. Johnson, G. Wallace, D. Marks ir ensponse to Flores subpones for documents and materials relied upon; email to K. Stebner re same shone call with K. Scherier z. Flores in Subpones are renouse.
Kathryn Stebner	11/8/2021	0.30 0.70	\$1,300.00	\$910.00	phone call with K. Stehner in Flores subponen response redwel joint streament / MTC resident files and requirements under CA law to provide same to resident upon request
Kathryn Stebner Brian Umpierre	11/8/2021 11/8/2021	0.20 0.50	\$1,300.00 \$925.00	\$260.00 \$462.50	discuss discovery joint statement re real-lest fills with B. Umpierre emails with D. Wards, C. Waldzer, M. Rivers repress, suppose response, including public domain materials in similar understuffing case that were previously confidential
Brian Umpierre	11/8/2021	5.00	\$925.00	\$4,625.00	draft Plaintiffs' portion of joint letter brief / motion to compel re resident files for class certification declarants
Brian Umpierre Kathryn Stebner	11/8/2021 11/9/2021	0.40	\$925.00 \$1,300.00	\$370.00 \$3,250.00	email to M. Johnson re ligals claim for failure to provide resident records pursuant to CA regulation review Protective Order is militar unarchatfulfil tigistion to use certain informational in Resolutable (ligation or the control or the control order is militar unarchatfulfil tigistion to the control order is military understalling (ligation use certain informational in Resolutable (ligation).
Kathryn Stebner	11/9/2021	0.50	\$1,300.00	\$650.00	discussion with 8. Umpierre re Protective Orders and use of information from/in similar understaffing liigation
Brian Umpierre Brian Umpierre	11/9/2021 11/9/2021	0.50	\$925.00 \$925.00	\$462.50 \$647.50	review file for record of coursed designating flores' deposition transcript in similar federal court understaffing case confidential pursuant to protective order -re-Flores subpoema response data remail 0.5. Listing counset for relaying to production of long de occurrent in finished
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 Brian Umpierre	11/9/2021 11/9/2021	0.90	\$925.00 \$925.00	\$832.50 \$462.50	emails with M. Johnson, O. Wallace, D. Marker: impact of protective order in Aegis litigation on Brookdaile discovery discussion with N. Esbener reade protective Order in Aegis litigation on Brookdaile discovery discussion with N. Esbener reade 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 Kathryn Stebner	11/12/2021 11/15/2021	1.00 0.50	\$925.00 \$1,300.00	\$925.00 \$650.00	review Broakshir's portion or joint letter brief or Pulamithf: motion to compet declarant resident files; edits to Plaintiffs' section based thereon and forward to M. Johnson, G. Wallace for review and comment review Defendantly protion of joint statement JMTC on existent files
Brian Umpierre	11/15/2021	0.50	\$925.00	\$462.50	review Broodale's portion of joint letter brief; emails with G. Wallace, M. Johnson re same; email to M. Jacobsen requesting Defendants edit their portion to 2.5 allotted pages
Brian Umpierre Brian Umpierre	11/16/2021 11/17/2021	0.30	\$925.00 \$925.00	\$277.50 \$277.50	emails with M. Johnson in splint letter brief on declarant resident files; finalize and send for filing review data; fur little the brief on declarant resident files; finalize and send for filing review data; fur little the brief i month to be compel our transportation policies; en mail to M. Johnson re same
Brian Umpierre	11/17/2021	1.00	\$925.00	\$925.00	team call re discovery, depos, assignments, status
Kathryn Stebner Brian Umpierre	11/18/2021 11/22/2021	0.40	\$1,300.00 \$925.00	\$520.00 \$185.00	review memo re status of outstanding discovery review memo re status of outstanding discovery review memi from G. Gurutel attanding discovery review memi from G. Gurutel attanding dunning letter to H. Febber (Plaintiff Schmidt conservator)
Brian Umpierre	11/22/2021	0.40	\$925.00	\$370.00	emails with D. Marks re anticipated depo testimony of staffing expert Flores and ability to disclose / whether 'confidential' pursuant to protective orders in Aegis or Sunrise litigations
Brian Umpierre Brian Umpierre	11/23/2021 12/1/2021	0.50 1.00	\$925.00 \$925.00	\$462.50 \$925.00	telephonic meet and confer re production of updated resident files; email summary to M. Johnson re same Plaintiffs saffing expert Rorse object proper - refer Angle got portscripts re 2 person assist and oblobel time; email to J. Hornton re same
Brian Umpierre	12/1/2021	1.20	\$925.00	\$1,110.00	team call re discovery, strategy
Brian Umpierre Brian Umpierre	12/1/2021 12/1/2021	0.80	\$925.00 \$925.00	\$740.00 \$370.00	legal research re stability opfenition or RPEF and the cilillers falling within same email to G. Wilson. A Unidors. I entating a description of in-service training at RPEFs
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 understaffing litigation when offering testimony in Brookdale litigation
Brian Umpierre Brian Umpierre	12/2/2021 12/2/2021	2.40 2.00	\$925.00 \$925.00	\$2,220.00 \$1,850.00	phone call with D. Marks in staffling apperts' compliance with protective corders in similar understaffling (litigation when offering testimony in Brookdale (litigation) emails with D. Marks in exame dark responses and objections to 3 of set of ROSo or Sinantifi R. Schmidt
Kathryn Stebner	12/3/2021	0.80	\$1,300.00	\$1,040.00	discuss with B. Umpierre Aegis confidential info and Flores depo / protective order in Brookdale litigation
Brian Umpierre Brian Umpierre	12/3/2021 12/3/2021	1.70	\$925.00 \$925.00	\$1,572.50 \$832.50	dat letter to counsel in similar understämlig litigation er compliance with protective order, emails with D. Naria, M. Johnson, J. Thomton er same GoT-lov-leting livib. D Naria, J. Thomton, D. Johnson er salling experts' compliance with protective corders is insiliary understämling litigation and Plantifity-Flores Appx 17
Brian Umpierre	12/3/2021	0.60	\$925.00	\$555.00	phone call with M. Johnson re staffing experts' compliance with protective orders in similar understaffing litigation when offering testimony in Brookdale litigation
Brian Umpierre Brian Umpierre	12/3/2021 12/3/2021	0.80 1.90	\$925.00 \$925.00	\$740.00 \$1.757.50	phone call with X. Stellener in Augit Protective Order further editor to dark letter to counts in inimizar understatffing (ligidation re Brooksidae discovery requests; edits to letter to Brooksidae outside of sources of the Augit Protective Order; phone calls with M. Johnson, J. Thomton re same
Brian Umpierre	12/3/2021	0.50	\$925.00	\$462.50	finalize letter (and attachments) and send to opposing coursel in similar understaffing litigation re staffing experts' compliance with protective order when offering testimony in Brookdale litigation; follow up phone call with coursel re same
Brian Umpierre Brian Umpierre	12/3/2021 12/4/2021	0.10	\$925.00 \$925.00	\$92.50 \$740.00	forward draft responses and objections to 26 set of PIOSs to R. Schmidt to M., Johnson and O. Wallace for review and comment plane call with D. Natis and emails with M. Anktron or seam, concerning degree to which A.M/PC congregate ross over and provide care to other sections - re Plaintiff's staffing expert Flores deposition preparation
Brian Umpierre	12/6/2021	3.00	\$925.00	\$2,775.00	targeted Relativity database searches re "direct care staff" defined
Brian Umpierre Brian Umpierre	12/6/2021 12/7/2021	0.30	\$925.00 \$925.00	\$277.50 \$1.387.50	emails with D. Marks, I. Thomston re confidentiality of Flores deposition testimony proffered in similar understaffing litigation (Sunviso) - re-Plaintiffs' staffing expert Flores deposition preparation targetical Relativity searchers or "descrate staff' defined, care staff' defined.
Brian Umpierre	12/7/2021	1.20	\$925.00	\$1,110.00	review docket and pull Plainitiff expert Schroyer deposition excerpts filed in the public record in similar understaffing case (Sunrise) re Schroyer deposition preparation
Brian Umpierre Brian Umpierre	12/7/2021 12/9/2021	0.70	\$925.00 \$925.00	\$647.50 \$462.50	retrieve order on production of MediFolded package [files; formand same to 1. Thernton telephonic discovery meet and context or braining records with M. Johnson and defense to the context of the cont
Brian Umpierre	12/16/2021	0.40	\$925.00	\$370.00	email to A. Xu attaching revised ownership spreadsheet produced by Brookdale in July 2021
Brian Umpierre Kathryn Stebner	12/22/2021 12/23/2021	1.30 0.30	\$925.00 \$1.300.00	\$1,202.50 \$390.00	telephonic met and confer with M. Johnson and defense re management agreements; declarant resident flies; resident constant into, local transportation policies; identification of employees required to provide direct care; performance reviews; financial docs; staffing analysis docs review summany of met and confer re production of resident files. Tradition contact into, local transposition policies, for existing analysis of the conference of

Brian Umpierre	12/23/2021	0.60	\$925.00	\$555.00	draft email summary of 12/21 meet and confer and forward to M. Johnson for review and comment
Brian Umpierre		0.10	\$925.00	\$92.50	email with H. Fisher (Plaintiff Schmidt conservator) re availability for deposition preparation session
Brian Umpierre Brian Umpierre	1/3/2022	0.10 0.20	\$925.00 \$925.00	\$92.50 \$185.00	email to S. Where I was the control was the co
Brian Umpierre Kathryn Stebner	1/4/2022	0.30 2.10	\$925.00 \$1,300.00	\$277.50 \$2,730.00	elation was in r. Frame (Fastinian Collision Collision September (Fastinian Collision Collision) (Fastinian Collision Collisio
Brian Umpierre	1/10/2022	4.20	\$925.00	\$3,885.00	H. Fisher (Schmidt conservator / class rep) deposition preparation session via Zoom
Brian Umpierre	1/10/2022	0.40	\$925.00	\$370.00	review new Schmidt-related emails and correspondence from conservator Fisher - class representative deposition preparation discuss preliminary Fisher deposition preparation session with B. Umpierre
Kathryn Stebner	1/11/2022	0.40	\$1,300.00	\$520.00	
Brian Umpierre	1/11/2022	0.30	\$925.00	\$277.50	discuss preliminary Flaher (Schmidt conservator) deposition preparation session with K. Stebner review new documents from H. Flaher and prepare for production; email to M. Johnson, G. Wallace re same
Brian Umpierre	1/13/2022	2.00	\$925.00	\$1,850.00	
Brian Umpierre	1/13/2022	0.40	\$925.00	\$370.00	phone call with M. Johnson neme Flaher documents to be produced and status of deposition preparation
Brian Umpierre	1/13/2022	3.00	\$925.00	\$2,775.00	prepare Flaher/Schmid documents for reads-confugoration, legal research re conservator and printing (II any)
Brian Umpierre	1/14/2022	2.60	\$925.00	\$2,405.00	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 edit Fisher (Schmidt conservator) deposition defense outline
Kathryn Stebner	1/17/2022	0.40	\$1,300.00	\$520.00	
Brian Umpierre	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 witness of 'key points' to remember emails with C. Wildszer e-Fisher deposition preparation
Brian Umpierre	1/17/2022	0.30	\$925.00	\$277.50	
Brian Umpierre	1/18/2022	2.50	\$925.00	\$2,312.50	review smalls/inotes and revise draft outline for today's depo prep session with H. Fisher H. Fisher (Schmidt consentator Lices steep) deposition preparation session in J. A Zoom
Brian Umpierre	1/18/2022	4.00	\$925.00	\$3,700.00	
Kathryn Stebner	1/19/2022	0.60	\$1,300.00	\$780.00	discussion with B, Umijerire re Fisher deposition defense. If, Fisher deposition reperation - review other class no deposition of the second
Brian Umpierre	1/19/2022	5.00	\$925.00	\$4,625.00	
Brian Umpierre Brian Umpierre	1/19/2022	0.80	\$925.00 \$925.00	\$740.00 \$8,325.00	prepare for H. Fisher (Schmidt conservator / class rep) deposition - review notes/outline and discussion with K. Stebner H. Fisher (Schmidt conservator / class rep) deposition via Zoom
Kathryn Stebner Brian Umpierre	1/21/2022	0.50 0.50	\$1,300.00 \$925.00	\$650.00 \$462.50	meet with S. Stehen re Fisher deposition - outcome and highlights
Brian Umpierre	1/21/2022	0.60	\$925.00	\$555.00	review Protective Order re designating testimony confidential; email to M. Jacobson re same
Brian Umpierre	1/21/2022	1.00	\$925.00	\$925.00	team call re strategy, discovery, class certification projects email correspondence with defense re request for stipulation on Daubert briefing page limitations; email to G. Wallace, M. Johnson re same
Brian Umpierre	1/24/2022	0.30	\$925.00	\$277.50	
Brian Umpierre Brian Umpierre	1/28/2022 1/28/2022	0.20	\$925.00 \$925.00	\$185.00 \$370.00	review draft discovery letter brief and forward edits re same to M. Johnson, G. Wallace email to R. Silver et class member lette trengible email to R. Silver et class member lette trengible email to R. Silver et class member destinated and the silver email to R. Silver et class member destinated and the silver email to R. Silver et also member destinated and the silver email to R. Silver et also member destinated and the silver email to R. Silver et also member destinated and the silver experience and the s
Brian Umpierre	1/28/2022	1.50	\$925.00	\$1,387.50	download and review H. Falher (Schmidt consensator) deposition transcript, circulate to transcr, notes/sammany for life
Brian Umpierre	2/1/2022	0.40	\$925.00	\$370.00	review defense senal ret tests during Falher deposition; en and to G. Wallace, N. Johnson en same, reviewed defense senal ret tests during Falher deposition; en and to G. Wallace, N. Johnson en same, reviewed depos transcript en same
Brian Umpierre	2/3/2022	0.50	\$925.00	\$462.50	observe discovery motion to competi hearing re training and budget compliance materials review draft of Plaintiff Schmidt supplemental responses to Rog Set 2; email to M. Johnson re same
Brian Umpierre	2/3/2022	0.50	\$925.00	\$462.50	
Brian Umpierre Brian Umpierre	2/4/2022	1.00	\$925.00 \$925.00	\$925.00 \$370.00	team conference call re discovery status, class certification, Daubert oppositions compile class certification pleadings (redacted) in similar understaffing class case and circulate to team
Brian Umpierre	2/4/2022	2.50	\$925.00	\$2,312.50	review Defendants' Daubert motions against Plaintiffs' experts Flores and Schroyer and notes re same
Kathryn Stebner	2/7/2022	0.70	\$1,300.00	\$910.00	discussion with B. Umpierre restrengths and weaknesses re Schroper/Force Daubert motions / motions to exclude
Brian Umpierre	2/7/2022	0.60	\$925.00	\$555.00	email to H. Fird weight Schmidt consensative) attaching deposition transcript and engial-initing process for identifying prefata
Brian Umpierre	2/7/2022	7.70	\$925.00	\$7,122.50	draft oppositions to Florer/Schroyer Daubert motions - review Florer, Schroyer declarations is support of class certification, pencil outline of oppositions; discussion with K. Stebner re-same discuss strengths and weaknesses is Sechorer/Florez bublet motions of motions to exclude with K. Stebner
Brian Umpierre	2/7/2022	0.60	\$925.00	\$555.00	
Brian Umpierre	2/8/2022	7.30	\$925.00	\$6,752.50	draft oppositions to Flores/Schroyer Daubert motions - review Flores deposition transcript, further edits to draft outline of oppositions conference call among d. Wallisse, N. Horbnorn, D. Harsy, J. Immotine re ReviewSchroyer Daubert propositions conference call among d. Wallisse, N. Horbnorn, D. Harsy, J. Immotine re ReviewSchroyer Daubert propositions
Brian Umpierre	2/9/2022	1.00	\$925.00	\$925.00	
Brian Umpierre	2/9/2022	6.70	\$925.00	\$6,197.50	draft oppositions to Flore#Schroyer Daubert motions - review Schroyer deposition transcript, further edits to draft outline of oppositions discussion with B. Umplerre re Schroyer/Flores Daubert motions and briefing schedule
Kathryn Stebner	2/10/2022	0.40	\$1,300.00	\$520.00	
Brian Umpierre Brian Umpierre	2/10/2022	5.80 0.40	\$925.00 \$925.00	\$5,365.00 \$370.00	discussion with K. Stebner re-Piorest Schroyer Daubert of processions - legisla research, duck discussion with K. Stebner re-Piorest Schroyer Daubert of processions to estude oppositions and briefing schedule
Kathryn Stebner	2/11/2022	0.70	\$1,300.00	\$910.00	review B. Umpierre email re motion to enlarge time on Daubert oppositions and draft langage for Stebner firm's professional commitments during Feb-Mar; discussion with B. Umpierre re same.
Brian Umpierre	2/11/2022	0.40	\$925.00	\$370.00	email to K. Stebner re motion to enlarge time on Daubert opposition; draft language for Stebner-firm's professional commitments during Feb Mar
Brian Umpierre	2/11/2022	9.50	\$925.00	\$8,787.50	draft Rores Daubert opposition
Brian Umpierre	2/12/2022	2.50	\$925.00	\$2,312.50	draft Flores Daubert opposition; forward same to G. Wallace for review and comment
Brian Umpierre	2/14/2022	8.50	\$925.00	\$7,862.50	draft Schroyer Daubert opposition - legal research, draft
Brian Umpierre Brian Umpierre	2/15/2022 2/15/2022	0.30 6.50	\$925.00 \$925.00	\$277.50 \$6,012.50	forward absent class member voice mail contact to Schneider Wallace outreach team for follow up draft Schroper Dabert opposition or legisle research; draft aft draft Schroper Dabert opposition or legisle research; draft
Brian Umpierre	2/16/2022	3.40	\$925.00	\$3,145.00	review Flather (Schmidt conservator) deposition transcript and compile list of errata; forward same to H. Flisher for review/confirmation legal research re-computer simulations in light of Daubert standard
Brian Umpierre	2/16/2022	4.20	\$925.00	\$3,885.00	
Kathryn Stebner Brian Umpierre	2/17/2022	1.80	\$1,300.00 \$925.00	\$2,340.00 \$370.00	super scheme in the composition in region of contact is desirative to receive virtual Protect Subsect apposition of contact is desirated in the contact in the contact is desirated in the contact in the
Brian Umpierre	2/17/2022	2.00	\$925.00	\$1,850.00	draft Flores Daubert opposition - further edits
Kathryn Stebner	2/18/2022	0.60	\$1,300.00	\$780.00	discussion with B. Umplierre re' corporate control' by Brookdale and case theory vs evidence; scheduling cont call with RBGG re same. review DSS subpoena to centralized applications bureau in Sacramento re complaint investigation and facility reports; email to M. Johnson re same
Brian Umpierre	2/18/2022	0.40	\$925.00	\$370.00	
Brian Umpierre	2/18/2022	2.50	\$925.00	\$2,312.50	legal research for Daubert oppositions - legal standard review corporation control manufacture of the control manufacture of the control men and the control men and the control men and the control men and the control men
Brian Umpierre	2/18/2022	0.90	\$925.00	\$832.50	
Brian Umpierre	2/18/2022	0.70	\$925.00	\$647.50	team call re status or shortfall staffing earlayis, discovery motions, and offensive/defensive Baubert motions meet with B. Uniperine restatus of shortfall analysis, discovery motions, Dauberts where the most projective restatus of shortfall analysis, discovery motions, Dauberts
Kathryn Stebner	2/19/2022	0.40	\$1,300.00	\$520.00	
Brian Umpierre	2/19/2022	0.40	\$925.00	\$370.00	meeting with K. Stebner re shortfall staffing analysis update and Daubert motions status conference call with B. Umpierre, RBGG (AX, GGG) re corporate liability discussion with B. Umpierre re same.
Kathryn Stebner	2/22/2022	1.00	\$1,300.00	\$1,300.00	
Brian Umpierre Brian Umpierre	2/22/2022	2.00	\$925.00 \$925.00	\$1,850.00 \$462.50	review case files in similar understaffing cases against large chains for relevant "after ego" liability information in preparation for conference call with co-counsel firm re import of same issue for Brookdale conference call with K. Stebner, A. Xu, G. Gruntfeld re corporate liability
Brian Umpierre Kathryn Stebner	2/22/2022	5.00 0.50	\$925.00 \$1.300.00	\$4,625.00 \$650.00	Flores Daubert opposition - further edits and additional legal research discussion with B. Umpierre recover/operator issue and Bowman 30/b/6/i testimony re same and update on expert/Daubert motions.
Brian Umpierre	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 Umpierre	2/23/2022	6.70	\$925.00	\$6,197.50	Florest'Schroyer Daubert oppositions: distinguishi Defendants' cases review met an act order letter requisiting production of Problematis and the Company of
Brian Umpierre	2/24/2022	0.20	\$925.00	\$185.00	
Brian Umpierre	2/24/2022	0.30	\$925.00	\$277.50	email to H. Fisher (Schmidt conservator) with statchments re depo errata finalize dath of Rivers Dubather opposition; froward same for D. Wallace for review, comment
Brian Umpierre	2/24/2022	1.30	\$925.00	\$1,202.50	
Brian Umpierre	2/24/2022	4.10	\$925.00	\$3,792.50	Schroyer Daubert opposition - further edits, drafting forward absent class member contact to Schneider Wallace outreach team for follow up
Brian Umpierre	2/25/2022	0.20	\$925.00	\$185.00	
Brian Umpierre	2/25/2022	5.20	\$925.00	\$4,810.00	Schroyer Daubert opposition - further edits, drafting, legal research emails with H. Fisher (Schmidt consensator) re deposition errata
Brian Umpierre	2/28/2022	0.20	\$925.00	\$185.00	
Brian Umpierre Brian Umpierre	2/28/2022	0.30 6.50	\$925.00 \$925.00	\$277.50 \$6,012.50	Section of the Contract Contraction of the Contract
Kathryn Stebner	3/1/2022	0.50	\$1,300.00	\$650.00	discussion with B. Umpierre re Schroyer Daubert opposition.
Brian Umpierre	3/1/2022	6.60	\$925.00	\$6,105.00	Schroyer Daubert opposition - Nurther edits, drafting, legal research; update K. Stebner re same Flores Daubert opposition - review G. Wallace redline and incorporate edits
Brian Umpierre	3/2/2022	1.50	\$925.00	\$1,387.50	
Brian Umpierre	3/2/2022	5.80	\$925.00	\$5,365.00	Schreyer Daubert opposition - further edits, dating, legal research review data (Schreyer Daubert opposition)
Kathryn Stebner	3/3/2022	0.80	\$1,300.00	\$1,040.00	
Brian Umpierre	3/3/2022	6.00	\$925.00	\$5,550.00	Schroyer Daubert opposition - draft and forward same to G. Wallace for review, comment
Kathryn Stebner	3/4/2022	4.40	\$1,300.00	\$5,720.00	review Defendant's oppisition to Lass certification and supporting papers experts
Brian Umpierre	3/4/2022	7.30	\$925.00	\$6,752.50	review Defendants' Opposition to Class Certification and supporting papers, including declarations of Saad and Jacobson re understaffing email to defense re Eribiti A for Sackon Declarations, emplais with J. Thorston, b., Oploson es same
Brian Umpierre	3/4/2022	0.30	\$925.00	\$277.50	
Brian Umpierre	3/4/2022	1.50	\$925.00	\$1,387.50	team call re class certification opposition filing, strategy, assignments meet with B. Universe and analyse Optomatric class certification opposition meet with B. Universe and analyse Optomatric class certification opposition
Kathryn Stebner	3/5/2022	1.20	\$1,300.00	\$1,560.00	
Brian Umpierre Brian Umpierre	3/5/2022 3/7/2022	1.20	\$925.00 \$925.00	\$1,110.00 \$462.50	meet with K. Stebner and analyze Defendants' class certification opposition emails with D. Marks re-contract labor document request, as regards Floreu/Schroyer Daubert oppositions
Brian Umpierre	3/7/2022	0.70	\$925.00	\$647.50	review Jacobson Declaration Ex A (CV); emails with J. Thornton re same
Brian Umpierre	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 Flores/Schroyer Daubert oppositions - review Jacobson website and information contained therein; email to J. Thomton re same
Brian Umpierre	3/8/2022	1.50	\$925.00	\$1,387.50	
Brian Umpierre	3/8/2022	0.70	\$925.00	\$647.50	phone call with D. Marks, J. Thornton re Flores and Schroyer Daubert oppositions and class certification opposition (generally); forward draft oppositions emails with team re defense expert Saad Declaration Ex A (CV) and attaching same
Brian Umpierre	3/8/2022	0.20	\$925.00	\$185.00	
Brian Umpierre	3/8/2022	4.00	\$925.00	\$3,700.00	Review detense expert Saad Declaration is support of opposition to class certification and notes to file further edits for Rows and Schroyer published positions in consideration of Class Cert Opposition and Saad/Jacobson declarations in support thereof
Brian Umpierre	3/8/2022	1.50	\$925.00	\$1,387.50	
Brian Umpierre Brian Umpierre	3/9/2022 3/9/2022	0.60	\$925.00 \$925.00	\$555.00 \$740.00	email correspondence with J. Thornton re meaning of job code 999 and salaried employees; review correspondence re same - regarding Flores/Schroyer Daubert oppositions 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 Umpierre	3/9/2022	0.40	\$925.00	\$370.00	phone call with J. Thorston in pilo-code/room number into for staffing analysis: - ne Piones/Schroyer Daubert oppositions
Brian Umpierre	3/9/2022	4.00	\$925.00	\$3,700.00	targited Relativity database searcher is room numbers / into final intelligence for piones/Schroyer Daubert oppositions
Brian Umpierre	3/9/2022	0.50	\$925.00	\$462.50	research re peer reviewed literature on transfer trauma - re reply in support of motion for class certification team call re class certification reply - strategy / assignments
Brian Umpierre	3/9/2022	1.00	\$925.00	\$925.00	
Brian Umpierre Brian Umpierre	3/9/2022 3/10/2022	1.00	\$925.00 \$925.00	\$925.00 \$2,220.00	review Daubert cases addressing use of computer simulations forwarded by D. Marks re Schroyer Daubert opposition review Daubert cases addressing use of computer simulations forwarded by D. Marks re Schroyer Daubert opposition
Brian Umpierre	3/10/2022	0.70	\$925.00	\$647.50 \$1,850.00	review discovery letter brief requesting Brookdale's production of benchmark staffing formula; compare draft Flores Daubert opposition and conform
Brian Umpierre	3/10/2022	2.00	\$925.00	\$1,850.00	search/relevel transfer trauman gener relevened literature in connection with reply in support of motion for class certification discriberiow with 8. Uniquere re transfer traumar - reclass cert reply. review transfer traumar rejocation stress androwne count afficient, discussion with K. Stebner re same in support of class certification reply
Kathryn Stebner	3/11/2022	0.50	\$1,300.00	\$650.00	
Brian Umpierre	3/11/2022	4.00	\$925.00	\$3,700.00	
Brian Umpierre	3/11/2022	0.50	\$925.00	\$462.50	review D. Marks email and attachments re production of SAS software in other titigation
Brian Umpierre	3/11/2022	0.30	\$925.00	\$277.50	emails with beam ne propounding newest set of document requests on Brooksidale conference call with G. Wallace, P. Hormon or Schroper, Pierze Daubert oppositions
Brian Umpierre	3/11/2022	1.40	\$925.00	\$1,295.00	
Brian Umpierre	3/14/2022	1.00	\$925.00	\$925.00	review transfer traums journal articles; date memo excepting citable portions; forward same to G. Wallace for inclusion in class certification reply phone call with O. Marks re Schroy, Fores Daubert oppositions and production on materials in discovery
Brian Umpierre	3/14/2022	0.30	\$925.00	\$277.50	
Brian Umpierre	3/14/2022	3.40	\$925.00	\$3,145.00	pull 2020-2021 joint discovery statements and review; dath insert / declaration re discovery, missing data, follow up re non-manipulation, for inclusion in class certification reply materials review defense sevent Sac Declaration re class certification reply and Database repositions.
Brian Umpierre	3/14/2022	3.80	\$925.00	\$3,515.00	
Brian Umpierre	3/15/2022	10.30	\$925.00	\$9,527.50	Schroye Daubert opposition - Incorporate D. Marks edits and further revisions shone call with N. O. Whates collis and further revisions shone call with N. O. Whates er Revision Schroer Daubert oppositions and filing the control of
Brian Umpierre	3/15/2022	0.30	\$925.00	\$277.50	
Brian Umpierre Kathryn Stebner	3/15/2022 3/16/2022	0.20	\$925.00 \$1,300.00	\$185.00 \$2,340.00	toward operative Flores Daubert opposition to G. Wallace with explanation of recent changes review final drafts of Flores and Schrover Daubert oppositions
Kathryn Stebner	3/16/2022	0.30	\$1,300.00	\$390.00	Section of the Control of the Contro
Brian Umpierre	3/16/2022	9.50	\$925.00	\$8.787.50	
Brian Umpierre	3/17/2022	12.30	\$925.00	\$11,377.50	draft B. Umpierre declarations supporting Flores / Schroyer Daubert oppositions and compile exhibits and cover pages; phone calls with D. Marks and G. Wallace re smac; review Schroyer declaration and insert cites
Brian Umpierre	3/18/2022	8.80	\$925.00	\$8,140.00	finalize and prepare Schroyer/Flores Daubert oppositions for filing including reductions; cells to briefs and B. Umpierre declarations; review/edit Flores declaration; finalize briefs/declarations, cites; phone calls with J. Yellin, G. Wallace, D. Marks, J. Thomton Go/ToMeeting with J. Thornton, G. Wallace, M. Johnson re Saad production and deposition preparation
Brian Umpierre	3/21/2022	0.40	\$925.00	\$370.00	
Brian Umpierre	3/22/2022	0.70	\$925.00	\$647.50	read/review draft discovery letter briefs re dann of operations and local transportation policies: review meet and confer correspondence per expose of Brookladis's search for transportation policies review A. X. unall relief berlief on Set & PRDs; review notes or management and relational cross association with BSL, Inc.; preva scale to be A. X.U.
Brian Umpierre	3/23/2022	1.00	\$925.00	\$925.00	
Brian Umpierre	3/23/2022	0.60	\$925.00	\$555.00	team call re class certification reply status/assignments and strategy team call re class certification reply status/assignments and strategy team control replacements of the control replacement of the control
Brian Umpierre	3/23/2022	4.00	\$925.00	\$3,700.00	
Kathryn Stebner	3/24/2022	0.30	\$1,300.00	\$390.00	meet with B. Umplerer e class certification reply strategy and status including ownership aspects
Brian Umpierre	3/24/2022		\$925.00	\$5,087.50	review management agreements re aspects of BSL, inc. 'control' re class certification reply
Brian Umpierre Brian Umpierre	3/24/2022 3/24/2022 3/24/2022	0.70	\$925.00 \$925.00	\$647.50 \$740.00	review image interns agreements in eagues to lock, inc. Currior to class certification in the control of the co
Brian Umpierre	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 Umpierre	3/28/2022	0.50	\$925.00	\$462.50	review draft letter brief re additional depositions over 10-depo limit email to A. Xu re management agreements / categories for class cert reply
Brian Umpierre	3/28/2022	0.50	\$925.00	\$462.50	
Brian Umpierre	3/30/2022	1.00	\$925.00	\$925.00	team call re class certification reply status and strategy, and discovery status and strategy observed iscovery hearing re additional depositions over 10-depo limit
Brian Umpierre	3/31/2022	0.20	\$925.00	\$185.00	
Brian Umpierre	4/6/2022	0.60	\$925.00	\$555.00	team call re class certification reply status and strategy, and discovery status and strategy discussion with B. Umplerer re propriety of obtaining declaration from elder resident who has duly authorized POA.
Kathryn Stebner	4/7/2022	0.50	\$1,300.00	\$650.00	
Brian Umpierre Brian Umpierre	4/7/2022 4/8/2022	0.40	\$925.00 \$925.00	\$370.00 \$277.50	discussion with K. Stebene re propriety of obtaining declaration from resident who has a duly authorized POA; email to R. Steyer re same phone call with G. Wallace re status of class certification reply and discovery projects related thereto
Brian Umpierre Brian Umpierre	4/11/2022 4/11/2022	0.80	\$925.00 \$925.00	\$740.00 \$277.50	point contained to the state and the state of the state o
Brian Umpierre Brian Umpierre	4/11/2022 4/11/2022 4/11/2022	1.00 3.20	\$925.00 \$925.00	\$925.00 \$2,960.00	prioritical want 2. Horistonia re lone Laser emanages pro unescriptions durines targeted Relabilitys searches in RN Caser manages plot descriptions review Sand class certification declaration and compile rebustial points
Brian Umpierre	4/11/2022	2.00	\$925.00	\$1,850.00	review Jacobson class cert declaration and compile rebuttal points
Brian Umpierre	4/12/2022	6.10	\$925.00	\$5,642.50	draft outlines/buillets of staffing expert (Piones, Schroyer) reply declarations supporting class certification
Brian Umpierre	4/12/2022	1.40	\$925.00	\$1,295.00	expert deposition preparation (defense expert Jacobson) - pull job descriptions for D. Marks
Brian Umpierre	4/12/2022	0.50	\$925.00	\$462.50	email correspondence re Jacobson expert deposition preparation and Schmidt allegations in Complaint; forward class certification declaration and email to J. Thornton re same targeted search re average length of stay at Brookdale facility, email to G. Wallace re same in support of class certification reply
Brian Umpierre	4/12/2022	0.70	\$925.00	\$647.50	
Brian Umpierre	4/13/2022	7.00	\$925.00	\$6,475.00	review G. Wallace outline for unhappy camper declaration project; review/edit unhappy camper declaration reply review/edit to unhappy camper declarations - re class certification reply review/edit to unhappy camper declarations - re class certification reply
Brian Umpierre	4/14/2022	4.80	\$925.00	\$4,440.00	

Brian Umpierre	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 Umpierre Brian Umpierre	4/15/2022 4/15/2022	1.00 2.30	\$925.00 \$925.00	\$925.00 \$2,127.50	email correspondence and phone call with R. Steyer re unhappy camper declaration edits reviewed/etil subappy camper declarations
Brian Umpierre Brian Umpierre	4/15/2022 4/15/2022	0.50 2.00	\$925.00 \$925.00	\$462.50 \$1,850.00	review defense experts Jacobson, Anderson depo summary notes the defense experts Jacobson, Anderson depo summary notes there exits to Perey/Schrover recyr declaration outlines/bullets following defense expert Jacobson deposition testimony
Brian Umpierre	4/15/2022	1.00	\$925.00	\$925.00	phone call with J. Thornyon re expert/Daubert argument strategy
Brian Umpierre Brian Umpierre	4/18/2022 4/18/2022	3.50 0.80	\$925.00 \$925.00	\$3,237.50 \$740.00	reviewedit unhappy camper declarations; forward same to R. Steyer email to Team e class certification of extraortises with PDAs email to Team e class certification of extraortises with PDAs
Brian Umpierre Brian Umpierre	4/18/2022 4/19/2022	3.20 4.00	\$925.00 \$925.00	\$2,960.00 \$3,700.00	draft Schroyer Reply Declaration in support of motion for class certification review region is support of Defination in motions to stills reply. Endows principles to sufficiently subject to the desired in motions to still reply. Exchinger principles to sufficiently support of Defination in motions to still reply. Exchinger principles are support of Defination in motions to still reply. Exchinger principles are support of Defination in motions to still reply and the support of Defination in motions to still reply and the support of Defination in motions to still reply and the support of Defination in motions to still reply and the support of Defination in the support of Defin
Brian Umpierre	4/19/2022	1.70	\$925.00	\$1,572.50	draft Schroyer Reply Declaration in support of motion for class certification
Brian Umpierre Brian Umpierre	4/19/2022 4/19/2022	0.40 1.00	\$925.00 \$925.00	\$370.00 \$925.00	review Brooktails 2.03 set of document requests to Plaintiffs review new Brooktaile document production ne ownership/combrol
Brian Umpierre Brian Umpierre	4/20/2022 4/20/2022	5.20 1.00	\$925.00 \$925.00	\$4,810.00 \$925.00	reviewedst unhappy camper declarations phone call with J. Thoreton is eScheye/Horse Reply declarations in support of motion for class certification
Brian Umpierre	4/20/2022	0.80	\$925.00	\$740.00	team call - class certification reply and supporting materials - status of assignments
Brian Umpierre Brian Umpierre	4/21/2022 4/22/2022	7.40 7.20	\$925.00 \$925.00	\$6,845.00 \$6,660.00	offensive Dauberts/motions to exclude against defense experts Saad and Jacobson - review respective declarations and outline/legal research re zame re abandoned and/or unreliable opinions legal research to Dauberts/motions to exclude - offensive (accionos/losa) and indensive (Poress/Schreger) - legal standards
Brian Umpierre	4/25/2022	1.00	\$925.00	\$925.00	phone call with G. Wallace, M. Johnson, J. Thornton, D. Marks re motions to exclude defense experts Saad and Jacobson
Kathryn Stebner Brian Umpierre	4/26/2022 4/26/2022	0.70 8.30	\$1,300.00 \$925.00	\$910.00 \$7,677.50	discussion with B. Umpierre re offensive Daubert motions directed at Brookstale experts Isodosson and Saad. draft motion to exclude defense experts Saad and Jacoboson - review Saad deposition transcription and draft undiline
Brian Umpierre Brian Umpierre	4/26/2022 4/27/2022	2.00 4.50	\$925.00 \$925.00	\$1,850.00 \$4,162.50	reviewed clit unhappy camper declarations targeted Relativity searches re LDR data produced by Brookdale; LDR data for Vallejo Hills and dates of Brookdale ownership; compile same; review and excerpt Saad depo testimony re same; emails and phone calls with 1. Thornton re same
Brian Umpierre	4/27/2022	0.50	\$925.00	\$462.50	review M. Johnson memo on evidentiany issues associated with class motion and reply
Brian Umpierre Brian Umpierre	4/27/2022 4/27/2022	0.50 0.50	\$925.00 \$925.00	\$462.50 \$462.50	phone call with D. Marker in Belson declaration in support of class certification reply phone call with R. Righter or unhappy camper declarations from continuous positions of the continuous properties of the continuous
Brian Umpierre Brian Umpierre	4/27/2022 4/27/2022	2.50 3.40	\$925.00 \$925.00	\$2,312.50 \$3,145.00	draft motion to exclude defense expert Saad unhappy camper declaration edits
Brian Umpierre	4/28/2022	2.50	\$925.00	\$2,312.50	D. Marks project refinding basis for expert reply declarations in opposition to class certification (not in response to Dauberts); email to D. Marks re same
Brian Umpierre Brian Umpierre	4/28/2022 4/28/2022	1.00 0.30	\$925.00 \$925.00	\$925.00 \$277.50	reviewdrif unhappyr camper declarations; forward same to R. Sityer reviewd. Wallaco untiline of the control of
Brian Umpierre Brian Umpierre	4/28/2022 4/29/2022	3.50 1.80	\$925.00 \$925.00	\$3,237.50 \$1,665.00	pull from Relativity additional LDR reports for I. Thornton analysis and forward same
Brian Umpierre	4/29/2022	0.30	\$925.00	\$277.50	review Ditus Heights Lifter is census su occupancy, email to J. Thornton re same email to D. Marks, T. Mornton, G. Wilster e DRF reports and notes/ariance explanations
Brian Umpierre Brian Umpierre	4/29/2022 4/29/2022	0.40	\$925.00 \$925.00	\$370.00 \$185.00	emails to G. Wallace, M. Johnson re timing of Jacobson/Baad motions to exclude / Dauberts and inclusion or LDRs as evidence of compliance with benchmarks review meet and confer correspondence to defense re-production of task times and labor benchmarks, meeting and conferring re-same, unrescondable delay
Brian Umpierre Brian Umpierre	4/30/2022 4/30/2022	2.00 2.00	\$925.00 \$925.00	\$1,850.00 \$1,850.00	review DBs re budget wrating reporting requirements review of the control of the
Kathryn Stebner	5/2/2022	1.00	\$1,300.00	\$1,300.00	review B. Umplerre outline of Jacobson/Saad Daubert motions and evidentiary bases for striking opinions
Kathryn Stebner Brian Umpierre	5/2/2022 5/2/2022	0.30 5.00	\$1,300.00 \$925.00	\$390.00 \$4,625.00	discuss darti outline of Disubertaimotions to arrisk Defendants' opports with B. Umpierre outline of Lisobertaimotion Sand Danker I motion to exclusion and evidentianty bassis or sinstituing opinions; phone call with J. Thomston re same
Brian Umpierre Brian Umpierre	5/2/2022 5/2/2022	2.50 1.80	\$925.00 \$925.00	\$2,312.50 \$1.665.00	targined Relativity database searches re-budget variance reporting requirements gould translated the search of the
Brian Umpierre	5/2/2022	0.30	\$925.00	\$277.50	pus troit retaining catastase as utilize register and vasing-resis utilized set uplicas for forwarding to 1. Informan discuss dark utiliser of Dauberthiomoto to strike defense experts Saad and Jacobson with K. Steheer
Brian Umpierre Brian Umpierre	5/3/2022 5/3/2022	0.20 2.20	\$925.00 \$925.00	\$185.00 \$2,035.00	review draft letter to counsel re deposition wongdoing allegations under the country of the coun
Brian Umpierre	5/3/2022	2.50	\$925.00	\$2,312.50	targeted Relativity database searches re budget oversight / (benchmark) variance reporting
Brian Umpierre Brian Umpierre	5/3/2022 5/3/2022	2.80 1.50	\$925.00 \$925.00	\$2,590.00 \$1,387.50	reviewells unhappy camper declarations, ferward same to R. Slayer team call re-clares certification rept. "status of assignments and update, further strategy team call re-clare scritication rept." status of assignments and update, further strategy
Kathryn Stebner Brian Umpierre	5/4/2022 5/4/2022	0.40	\$1,300.00 \$925.00	\$520.00 \$647.50	discussion with B, Umpilerre following co-coursed meeting for status of class certification reply and expert motiona/declarations related thereto reviewfeld trushings compare declarations, emails to 8, Steps yer same
Brian Umpierre	5/4/2022	1.20	\$925.00	\$1,110.00	pull from Relativity database LDRs and upload for forwarding to J. Thornton (Vacaville, Yorba Linda)
Brian Umpierre Brian Umpierre	5/4/2022 5/4/2022	6.50 0.50	\$925.00 \$925.00	\$6,012.50 \$462.50	benchmark variance report project (reviewing LD Risk for budget compliance/variance), including review operative draft of Reply G. Wallace declaration in support of class certification phone call with R. Stepur enumbage, campre declarations.
Brian Umpierre Brian Umpierre	5/4/2022 5/4/2022	1.00	\$925.00 \$925.00	\$925.00 \$370.00	phone call with D. Marks, J. Thornton, M. Johnson, G. Wallace re staffing expert reply declarations (Flores, Schroyer) and offensive Dauberts / motions to exclude defense experts Saad and Jacobson update K. Stebner following co-counsel call re-status of class certification reply and expert motional declarations related thereto
Brian Umpierre	5/5/2022	8.50	\$925.00	\$7,862.50	benchmark variance report project (reviewing LDRs for budget compliance/variance) - remaining initial set of facilities and email to G. Wallace re same
Brian Umpierre Brian Umpierre	5/5/2022 5/6/2022	0.30 2.00	\$925.00 \$925.00	\$277.50 \$1,850.00	review Protective Order re confidential designations; email to M. Johnson re same benchmark variance report project reviewing URS for to regide compliance-hard report project reviewing URS for the ordest compliance-hard
Brian Umpierre Brian Umpierre	5/6/2022 5/6/2022	0.40 0.50	\$925.00 \$925.00	\$370.00 \$462.50	review. Thorston draft of lones declaration supporting class certification and provide feedback phono call with J. Yellin, M. Obinons or motions to exclude (efferines Stadis/Locoton Dauberts)
Brian Umpierre	5/6/2022	0.70	\$925.00	\$647.50	email to J. Yellin re LDR project (variances/action plans) and phone call re same
Brian Umpierre Brian Umpierre	5/6/2022 5/6/2022	1.00 6.30	\$925.00 \$925.00	\$925.00 \$5,827.50	team call re Class Certification Reply and mollows to exclude defense experts Saad and Jacobson - status, strategy driff mollows to exclude defense experts Saad and solosoon of the status, strategy driff mollows to exclude defense experts Saad and solosoon of the status defense experts of the status defense exp
Brian Umpierre	5/6/2022 5/6/2022	0.50 0.50	\$925.00	\$462.50 \$462.50	phone call with J. Thornton re update on experts and motions to exclude
Brian Umpierre Brian Umpierre	5/7/2022	2.00	\$925.00 \$925.00	\$1,850.00	phone call with M. Johnson re update on experts and motions to exclude review draft flower class certification exploy declaration or letther support for staffing data analysis; emails with J. Thornton re same
Brian Umpierre Brian Umpierre	5/7/2022 5/8/2022	5.70 6.00	\$925.00 \$925.00	\$5,272.50 \$5,550.00	draft motion to exclude defense seperts Saud and Jacobson - Introduction and Jacobson section draft motion to exclude defense seperts Saud and Jacobson - Introduction and Jacobson section draft motion to reculted defense seperts Saud and Jacobson - Introduction and Jacobson section
Brian Umpierre	5/8/2022	0.60	\$925.00	\$555.00	emails with J. Yellin re LDR project and analysis for inclusion in class certification reply
Brian Umpierre Brian Umpierre	5/9/2022 5/9/2022	7.80 0.30	\$925.00 \$925.00	\$7,215.00 \$277.50	benchmark variance report project (reviewing LDRs for budget compliance/variance) - review LDRs for Alhambra, Corona, North Euclid, Paulin Creek, S. Tarzana, Irvine, Kettelman Lane, Lodi, Loma Linda emails with J. Thomstone redutant stating report declarations.
Brian Umpierre Brian Umpierre	5/9/2022 5/9/2022	0.60	\$925.00 \$925.00	\$555.00 \$277.50	draft control/discretion/LDR insert for class certification regly, froward same to G. Wallace for review, comment phone call with J. Velien to LDR poject and analysis for includion in class certification regly
Brian Umpierre	5/10/2022	1.00	\$925.00	\$925.00	team call - Class Certification Reply status and update on status of expert motions to exclude
Brian Umpierre Brian Umpierre	5/10/2022 5/10/2022	5.60 0.30	\$925.00 \$925.00	\$5,180.00 \$277.50	benchmark variance report project (reviewing LD Risk for budget compliance/variance) and emails with J. Yellin re same phone call with R. Stept re unhappe, campre declarations.
Brian Umpierre Brian Umpierre	5/10/2022 5/10/2022	0.80 1.40	\$925.00 \$925.00	\$740.00 \$1,295.00	phone call with J. Thorston re staffing expert declarations - status and further edits draft Rores Calls scribtation Response Declaration cultimate the declaration of the staffing the declaration call the staffing the declaration cultimate the staffing
Brian Umpierre	5/11/2022	2.20	\$925.00	\$2,035.00	reviewledit unhappy camper declarations; forward same to R. Steyer
Brian Umpierre Brian Umpierre	5/11/2022 5/11/2022	1.20 2.90	\$925.00 \$925.00	\$1,110.00 \$2,682.50	GoToMeeting with J. Thornton, D. Marix, M. Johnson, G. Wallace re staffing export reports LDR / branchmark / Action plan project for inclusion in least certification reply materials
Brian Umpierre Brian Umpierre	5/11/2022 5/11/2022	2.60 0.50	\$925.00 \$925.00	\$2,405.00 \$462.50	review draft motion to exclude defense expert Jacobson and draft Belson declaration resame subject marter, pull Jacobson deposition excerpts for declaration exhibit sphone call with Mr. Johnson re motion to exclude defense experts Sand and Jacobson deposition excerpts for declaration exhibit sphone call with Mr. Johnson re motion to exclude defense experts Sand and Jacobson deposition excerpts for declaration exhibit sphone call with Mr. Johnson re motion to exclude defense experts Sand and Jacobson declaration research.
Brian Umpierre	5/11/2022	0.30	\$925.00	\$277.50	emails with M. Johnson re what if anything relied on by defense expert Jacobson is under seal
Brian Umpierre Brian Umpierre	5/12/2022 5/12/2022	0.50	\$925.00 \$925.00	\$462.50 \$555.00	phone call with J. Thorriton re update on Jones class certification reply declaration; cmail to N. Johnson re same email to N. Johnson re revised structure for motion to exclude Sadul/scobson and filling status.
Brian Umpierre	5/12/2022	0.50	\$925.00	\$462.50	review/edit unhappy camper declaration; emails with R. Steyer re same
Brian Umpierre Brian Umpierre	5/12/2022 5/12/2022	3.90 5.90	\$925.00 \$925.00	\$3,607.50 \$5,457.50	draft motion to exclude defines staffing experts. Sassifix-obsonition to DR project-benchmark compliance and action items; resemplat from each facility for inclusion in class certification reply materials
Kathryn Stebner Brian Umpierre	5/13/2022 5/13/2022	0.60 10.80	\$1,300.00 \$925.00	\$780.00 \$9,990.00	discussion with BL Umpierre in Dauberts/motions no seclude Jacobona and Saad. draft motion to exclude defense staffing geperts - Saad/placeboson
Brian Umpierre	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 Umpierre Brian Umpierre	5/13/2022 5/13/2022	0.40	\$925.00 \$925.00	\$370.00 \$370.00	email to J. Thornton re ability of Dr. Flores to sponsor LDR exhibit reviewefuld unkappy camper declaration, fravenus area no Br. Styper proviewefuld unkappy camper declaration, fravenus area no Br. Styper
Brian Umpierre Brian Umpierre	5/13/2022 5/13/2022	0.50	\$925.00 \$925.00	\$462.50 \$277.50	email to G. Wallace re lunguage from Residency Agreement for lodging complaints with Brooklade, including re requests for accommodations - re class certification reply phone call with N. Inhomor, G. Wallace re class certification reply and stuffing open or pipul not stuffing volume or class certification reply and stuffing open or pipul not stuffing on the complaint of the comp
Brian Umpierre	5/13/2022	1.10	\$925.00	\$1,017.50	team call - class certification reply status and updates
Brian Umpierre Brian Umpierre	5/14/2022 5/14/2022	5.00 6.50	\$925.00 \$925.00	\$4,625.00 \$6,012.50	draft motion to exclude defense experts (accessors) acad IDR project - benchmark complaines and action items; exemplar for each facility for inclusion in class certification reply materials
Brian Umpierre	5/15/2022	12.00	\$925.00 \$925.00	\$11,100.00	draft Rores Class Certification Reply Declaration 1.08 moder to exhibit benchmark commissione and artification (Fig. 1) and K. Silber re-same.
Brian Umpierre	5/16/2022	2.70	\$925.00	\$2,497.50	LDR project re facility benchmark compliance and action items
Brian Umpierre Brian Umpierre	5/16/2022 5/16/2022	4.30 1.20	\$925.00 \$925.00	\$3,977.50 \$1,110.00	draft Rivers Class Certification Reply Declaration team call - Class certification and status team call - Class cert reply update and status
Brian Umpierre Brian Umpierre	5/16/2022 5/16/2022	2.50 0.20	\$925.00 \$925.00	\$2,312.50 \$185.00	review/recidine draft class certification reply brief phone call with M_Johnson re motion to exclude defense experts Saad and Jacobson testimony
Brian Umpierre	5/16/2022	1.70	\$925.00	\$1,572.50	further edits to motion to exclude defense experts Saad amnd Jacobson testimony
Brian Umpierre Brian Umpierre	5/17/2022 5/17/2022	8.50 1.10	\$925.00 \$925.00	\$7,862.50 \$1.017.50	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. Thomton re same team call recision secretification region under and attacks.
Brian Umpierre	5/17/2022 5/17/2022	3.60 0.50	\$925.00 \$925.00	\$3,330.00 \$462.50	death and further to Flores controlled to Flores cases and the following the claration, emails with East me same restatus review ledit unhappy camper declarations supporting class certification; emails with R. Steyer re same
Brian Umpierre Kathryn Stebner	5/18/2022	1.70	\$1,300.00	\$2,210.00	review draft reply memorandum iso class certification; discussion with B. Umpierre re same.
Brian Umpierre Brian Umpierre	5/18/2022 5/18/2022	3.00 1.10	\$925.00 \$925.00	\$2,775.00 \$1,017.50	reduct 'confidential' information from expert reply declarations in advance of filing team call re-clare scriftication reply guidate and status
Brian Umpierre Brian Umpierre	5/18/2022 5/19/2022	9.90	\$925.00 \$925.00	\$9,157.50 \$370.00	draft motion to exclude testimony of defense experts Saad and Jacobson - further edits
Brian Umpierre	5/19/2022	0.40	\$925.00	\$370.00	team call reclass certification reply update and status phone call with N. Inhorson remotion to exclude teaminony of defense experts Saad and Jacobson
Brian Umpierre Brian Umpierre	5/19/2022 5/20/2022	12.60 0.50	\$925.00 \$925.00	\$11,655.00 \$462.50	further edits to medion to exclude testimony of defense experts. Sasid and Jacobson review outer fluids are faulthers considered from the control of the co
Brian Umpierre	5/23/2022 5/23/2022	0.20	\$925.00 \$925.00	\$185.00 \$185.00	forward expert Belson's final unreducted declaration in support of class certification reply to D. Marks for review
Brian Umpierre Brian Umpierre	5/24/2022	0.20	\$925.00	\$277.50	review defense email re emingency status conference review team correspondence re subsequent/supplemental expert productions on information relied upon in connection with class certification reply briefing
Brian Umpierre Brian Umpierre	5/25/2022 5/25/2022	0.50	\$925.00 \$925.00	\$462.50 \$370.00	team call re subsequent expert productions/motion for timing on offensive Daubert motions re staffing experts review DSS records for evidence industriage quenerality-control by BSL, Inc.
Brian Umpierre	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 Umpierre Brian Umpierre	5/25/2022 5/26/2022	0.20	\$925.00 \$925.00	\$185.00 \$277.50	phone call with D. Marks or expert discovery and deposition timing emails with. Thomsome relatifies "staffing opener production post reply submission of class certification reply declarations."
Brian Umpierre Brian Umpierre	5/26/2022 5/27/2022	0.40	\$925.00 \$925.00	\$370.00 \$462.50	review draft letter brief re Protective Order and Brookstain's confidential designations thereunder, email to M. Johnsoon re same review and respond to. Willake earnie in exposition to nominion to strille supplemental Sand declarations
Brian Umpierre	5/31/2022 5/31/2022	3.50 1.30	\$925.00	\$3,237.50	review opposition to motion to strike supplemental Saad declaration; legal research re-same
Brian Umpierre Brian Umpierre	6/1/2022	2.00	\$925.00 \$925.00	\$1,202.50 \$1,850.00	draft insert re reply iso motion to strike supplemental Saad declaration; circulate to team for review and comment legial research re striking supplemental expert reports submitted on reply
Brian Umpierre Brian Umpierre	6/1/2022 6/2/2022	0.80 1.50	\$925.00 \$925.00	\$740.00 \$1,387.50	review and comments at dark of revised reply iso motion to exclude supplemental Saad declaration review and composition to motion is self-in Rehalfs supplemental / reply event declarations and edited to same
Brian Umpierre	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 Umpierre Brian Umpierre	6/2/2022 6/2/2022	1.80 0.40	\$925.00 \$925.00	\$1,665.00 \$370.00	review motion to strike Plantinitis' attorney declarations; notes and legal research re same for opposition review opposition to request for judicial notice
Brian Umpierre Brian Umpierre	6/2/2022 6/3/2022	2.00 0.50	\$925.00 \$925.00	\$1,850.00 \$462.50	fact 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 phone call with h. Therenter re class certification and expert price leadings and responses to motions to securities of strike same
Brian Umpierre	6/3/2022	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 Umpierre Kathryn Stebner	6/3/2022 6/5/2022	4.50 1.30	\$925.00 \$1,300.00	\$4,162.50 \$1,690.00	review Brookdairs' oppositions to motions to exclude defense expert. Saad and Jacobson and notes re same meet with B. Universities and the same of the
Brian Umpierre	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 Umpierre Brian Umpierre	6/5/2022 6/5/2022	2.50 1.50	\$925.00 \$925.00	\$2,312.50 \$1,387.50	draft region jungoport of motion to exclude testimony of edients experts. Saudi/acoboson - colline conference call width G. Wallace, M. Morson, D. Marks, J. Hormon ere region jungoport of motion to exclude defense experts Saud and Jacobson
Brian Umpierre Brian Umpierre	6/5/2022 6/5/2022	0.70	\$925.00 \$925.00	\$647.50 \$555.00	review I. Thornton notes on Brookladi's opposition to motion to exclude testimony from defense experts Sadd and accesson review M. Johnson, C. Wilslace easily highlight of points is ordered in Sadd particulation on replyirebuilati
Brian Umpierre	6/5/2022	1.00	\$925.00	\$925.00	meet with K. Stebner 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 Umpierre Brian Umpierre	6/6/2022 6/6/2022	8.30 8.10	\$925.00 \$925.00	\$7,677.50 \$7,492.50	draft rejpl in support of motion to exclude defense experts Saad and Jacobson draft rejpl in support of motion to exclude defense experts Saad and Jacobson, including email correspondence with Isam re same
Brian Umpierre Brian Umpierre	6/6/2022 6/7/2022	0.50 0.50	\$925.00 \$925.00	\$462.50 \$462.50	review draft opposition to motion to continue class certification hearing team call re-update/or stategy or Theorem 1997 of the continue class certification hearing team call re-update/or stategy or Theorem 1997 of the continue of the c
Brian Umpierre	6/7/2022	2.50	\$925.00	\$2,312.50	review G. Wallace memo re additional considerations for Saad/Jacobson exclusion motions
Brian Umpierre Kathryn Stebner	6/7/2022 6/8/2022	6.70 0.50	\$925.00 \$1,300.00	\$6,197.50 \$650.00	review edits/redlines to draft reply iso motion to exclude Saad/Jacobson and incorporate same; further edits and emails, phone calls with M. Johnson and G. Wallace re same meet with B. Umplerre status of class certification expert motions
Brian Umpierre Brian Umpierre	6/8/2022 6/8/2022	0.40	\$925.00 \$925.00	\$370.00 \$370.00	phone call with D. Marks re reply in support of motion to exclude defense experts Saad/Jacobson; email to G. Wallace and M. Johnson re same emails with J. Thomton re defense expert Saad's use of data not available to Plaintiffs and argument in reply in support of motion to exclude re same
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Brian Umpierre	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 Umpierre	6/8/2022	0.50	\$925.00	\$462.50	discuss status or Class certification expert motions with X. Stebner 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 sar
Brian Umpierre	6/9/2022	7.70	\$925.00	\$7,122.50	
Brian Umpierre	6/10/2022	0.20	\$925.00	\$185.00	emails with G. Walface re potential class certification hearing demonstratives
Brian Umpierre	6/13/2022		\$925.00	\$185.00	review correspondence re stipulating to continuing hearing dates
Brian Umpierre Brian Umpierre	6/14/2022 6/15/2022	0.40	\$925.00 \$925.00	\$370.00 \$185.00	email correspondence with team re Brookdale confidential designations / filing under seal review draft discovery letter brief re Brookdale's confidential designations
Brian Umpierre Brian Umpierre	6/15/2022 6/15/2022	1.00	\$925.00 \$925.00	\$925.00 \$555.00	Review/comment on draft opposition to exclude attorney declarations submitted in support of class certification review draft fletter brief motion to exclude attorney declarations submitted in support of class certification
Brian Umpierre Brian Umpierre	6/16/2022 6/17/2022	0.30	\$925.00 \$925.00	\$277.50 \$370.00	phone call with D. Marks re expert discovery, potential expert depositions, and timing re same review internal correspondence re expert production / package files
Brian Umpierre	6/20/2022	0.50	\$925.00	\$462.50	review internal contesponents or expert productions rackage runs emails and phone calls with 1. Thornton re discovery requests applicable to staffing experts email to 1. Thornton re Schroyer class a certification declaration and Belson class certification reply declaration in relation to defense expert Saad analysis
Brian Umpierre	6/21/2022	0.50	\$925.00	\$462.50	
Brian Umpierre	6/21/2022	0.20	\$925.00	\$185.00	review M. Johnson email to Brookstale re under seat filings
Kathryn Stebner	6/22/2022	0.40	\$1,300.00	\$520.00	meet with B. Umplerre re counsel meeting re expert discovery issues including potential depositions and outstanding document/data productions conference call with M. Johnson, G. Wallace, D. Marks, J. Thornton re expert discovery - timing, tasks
Brian Umpierre	6/22/2022	0.50	\$925.00	\$462.50	
Brian Umpierre	6/22/2022	0.40	\$925.00	\$370.00	phone call with K. Stebner re expert discovery issues including potential depositions and outstanding document/data productions
Brian Umpierre	6/22/2022	3.50	\$925.00	\$3,237.50	review class certification papers and draft questions for hearing preparation session
Brian Umpierre	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 review Defendants' reply in support of motion to stirke attorney declarations
Brian Umpierre	6/23/2022	1.00	\$925.00	\$925.00	
Brian Umpierre	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 compile list of undisputed facts from staffing expert declarations / review Jones, Belson - re class certification hearing preparation
Brian Umpierre	6/28/2022	2.50	\$925.00	\$2,312.50	
Brian Umpierre	6/28/2022	2.60	\$925.00	\$2,405.00	review moot questions - TransLinion and other standing-related issues - for class cert hearing preparation review summary of discovery meet and confer session including re-production of staffing expert materials
Brian Umpierre	6/28/2022	0.40	\$925.00	\$370.00	
Brian Umpierre Kathryn Stebner	6/30/2022 7/1/2022	1.80	\$925.00 \$1.300.00	\$1,665.00 \$1,300.00	moot court preg with G. Wallace and team meet with B. Umpierre re status of class certification hearing preparation and expert discovery
Brian Umpierre Brian Umpierre	7/1/2022 7/1/2022	1.00	\$925.00 \$925.00	\$925.00 \$925.00	conference call with M. Johnson, D. Maris, J. Thornton re expert discovery responses and production of further materials relied upon meeting with K. Stebner re class certification hearing or responses and production of further materials relied upon
Brian Umpierre Brian Umpierre	7/3/2022 7/3/2022 7/3/2022	1.30	\$925.00 \$925.00	\$1,202.50 \$555.00	conference call with G. Wallace, M. Johnson, J. Thornton, D. Marks re experts and class certification hearing
Brian Umpierre	7/5/2022	4.20	\$925.00	\$3,885.00	review G. Wallace questions re staffing analysis and class certification, in advance of call re same phone call with J. Thornton re Plaintiffs' expert Flores' class certification argument points; sources/cites for Flores arguments
Brian Umpierre	7/5/2022	0.50	\$925.00	\$462.50	compile and forward journal articles relied on by Plaintiffs' expert Flores in support of class certification to G. Wallace class certification hearing project - 3' best' stories of bad outcomes re Plaintiff Ralph Schmidt
Brian Umpierre	7/6/2022	1.30	\$925.00	\$1,202.50	
Brian Umpierre	7/6/2022	0.90	\$925.00	\$832.50	review Marks' answers to G. Wallace staffing analysis / class certification questions
Brian Umpierre	7/7/2022	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 Umpierre	7/7/2022	0.70	\$925.00	\$647.50	emails with JT re class cert demonstratives, citations to record. hearing on Ps' motion for class certification; ND Cst (Oakland); Judge Gilliam.
Kathryn Stebner	7/8/2022	3.00	\$1,300.00	\$3,900.00	
Brian Umpierre	7/8/2022	2.50	\$925.00	\$2,312.50	attend class certification hearing; N.D. Cal. (Dakland), Judge Gilliam email summany of class certification hearing; forward same to G. Wallace for review, comment
Brian Umpierre	7/8/2022	0.60	\$925.00	\$555.00	
Brian Umpierre Kathryn Stebner	7/8/2022 7/9/2022	0.60	\$925.00 \$1,300.00	\$555.00 \$910.00	discuss class certification hearing among team - perceived highlights and trouble points discuss class certification hearing with 8. Umpierre
Brian Umpierre Brian Umpierre	7/12/2022 7/15/2022	1.00	\$925.00 \$925.00	\$925.00 \$370.00	team call re under seal filing and strategy re Order re same review email correspondence re conflidentiality of Flores/Schrover depo testimony
Brian Umpierre	7/18/2022	0.50	\$925.00	\$462.50	conference with M. Johnson, J. Thornton, D. Marks re Plaintiffs' experts Flores and Schroyer materials that need to be filed under seal
Brian Umpierre	7/18/2022	0.20	\$925.00	\$185.00	review email re confidentially of Flores/Schroyer depo testimony
Brian Umpierre	7/19/2022	0.50	\$925.00	\$462.50	review Order in similar understaffing case denying motion to seal order granting motion for class certification; forward and email to G. Wallace re same
Brian Umpierre	7/21/2022	0.50	\$925.00	\$462.50	review draft sealing papers phone call with G. Wallace re under seal B. Umpierre declaration exhibits, review email re same
Brian Umpierre	7/21/2022	0.50	\$925.00	\$462.50	
Brian Umpierre	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, XX, LL, and email response to G. Wallace re Plaintiffs' position on need for sealing review updated discovery production spreadsheet re current status and required follow up
Brian Umpierre	8/8/2022	0.50	\$925.00	\$462.50	
Brian Umpierre Brian Umpierre	8/9/2022 8/18/2022	0.40	\$925.00 \$925.00	\$370.00 \$277.50	review and comment re list of potential summary judgment issues review draft discovery letter brief seeking to compet production of defense expert Anderson-related expert documents
Brian Umpierre Brian Umpierre	8/18/2022 8/26/2022	0.50	\$925.00 \$925.00	\$462.50 \$277.50	review summary of discovery meet and confer re production of defense expert (Andesson) materials and review draft discovery letter brief re same review Defendants' portion of discovery letter brief re production of defense expert Anderson materials
Brian Umpierre	8/26/2022	0.70	\$925.00	\$647.50	review directions. Some on a source years on the reproduction or contents experient intentions email to M. Johnson re defense expert Anderson materials letter brief and summary of Special Master Guilford's discovery ruling in similar understatting biggistion re same issue meet with B. Umpierre re status and strategy of offensive/defensive aummary judgment.
Kathryn Stebner	9/12/2022	0.90	\$925.00	\$1,170.00	
Brian Umpierre	9/12/2022	0.40	\$925.00	\$370.00	team call re update / summary judgment thoughts
Brian Umpierre	9/14/2022	0.50	\$925.00	\$462.50	review D. Mont. case re ADA standing, public accommodations
Brian Umpierre	9/16/2022	0.60	\$925.00	\$555.00	review draft of motion for relief from Magistrate's Order of 9/2/22.
Brian Umpierre	9/19/2022	0.10	\$925.00	\$92.50	review supplemental discovery order issued today re further discovery motions
Kathryn Stebner	9/30/2022	1.10	\$1,300.00	\$1,430.00	review Defendants' motion to stay discovery
Kathryn Stebner	9/30/2022	0.30	\$1,300.00	\$390.00	meet with B. Umplerre re Defendants' motion to stay discovery re potential impact
Brian Umpierre	9/30/2022	1.00	\$925.00	\$925.00	review Defendants' motion to stay discovery
Brian Umpierre	10/10/2022	1.00	\$925.00	\$925.00	review briefing in similar understaffing litigation re stay pending ruling on class cert; notes re same in preparation for call with A. Xu re opp to motion to stay phone call with A. Xu re oppositing motion to stay discovery pending class certification ruling in similar understaffing litigation
Brian Umpierre	10/10/2022	0.40	\$925.00	\$370.00	
Brian Umpierre	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 Umpierre	10/12/2022		\$925.00	\$185.00	email correspondence with D. Marks re class certification opposition and staffing analysis
Brian Umpierre Brian Umpierre	10/13/2022 10/14/2022	0.80	\$925.00 \$925.00	\$740.00 \$647.50	review draft opposition to motion for stay, email to A. Xu and team re same review operative draft of discovery letter brief re defense expert Anderson materials; email to learn re same strategy with stay motion
Brian Umpierre	10/14/2022	0.20	\$925.00	\$185.00 \$462.50	email with R. Bonner re defendants' privilege log produced yesterday
Brian Umpierre	10/18/2022	0.50	\$925.00	\$650.00	review operative draft of letter brief to compel defense expert Anderson expert materials
Kathryn Stebner	10/19/2022	0.50	\$1,300.00		receive update from B. Umplerre re discovery status pending ruling on class certification
Brian Umpierre	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 Umpierre	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 Umpierre	10/19/2022	0.50	\$925.00	\$462.50	meeting with K. Stebner re discovery status pending ruling on class certification
Kathryn Stebner	11/29/2022	0.40	\$1,300.00	\$520.00	email to B. Umplerre re composition of proposed subclasses
Kathryn Stebner Brian Umpierre	11/30/2022 11/30/2022	0.40	\$1,300.00 \$925.00	\$520.00 \$462.50	review B. Umplerre email re ADA subclasses and (b)[2]/[b)[3] certification email to K. Stebner re ADA subclasses and (b)[2]/[b)[3] certification
Brian Umpierre	12/9/2022	1.50	\$925.00	\$1,387.50	phone call with D. Marks, J. Thornton re expert information relied upon / production
Brian Umpierre	12/9/2022	0.40	\$925.00	\$370.00	discussion with J. Thornton re payroll data sample used in staffing analysis
Brian Umpierre Brian Umpierre	1/9/2023 1/17/2023	0.20	\$925.00 \$925.00	\$185.00 \$277.50	review M. Johnson email re expert photographs used in motions for summary judgment emails with G. Wallace re Rule 26 report
Brian Umpierre	1/19/2023	0.20	\$925.00	\$185.00	email correspondence with A. Xu re client correspondence (Fisher/Schmidt) re case update
Brian Umpierre	1/23/2023		\$925.00	\$555.00	review D. Marks email re possible additional discovery from 6' sample' facilities including pendant data, billing details, identities of staff, room numbers
Kathryn Stebner	2/17/2023	0.80	\$1,300.00 \$925.00	\$1,040.00 \$647.50	review B. Umpierre memo re case status, discovery status, potential summary judgment, efforts to obtain list of current residents
Brian Umpierre Brian Umpierre	2/17/2023 2/17/2023	0.70 0.60	\$925.00	\$555.00	Team call - re case status, discovery status, motion(s) for summary judgment, obtaining updated list of current residents review draft RPD Set 9 and letter re access improvement discovery and email correspondence re same
Brian Umpierre Brian Umpierre	2/21/2023 2/27/2023	0.40	\$925.00 \$925.00	\$370.00 \$185.00	email correspondence with G. Wallace re Smith v Apple and injury in fact review internal email correspondence re RPD Set 9 edits
Brian Umpierre Brian Umpierre	2/28/2023 3/1/2023	0.30	\$925.00 \$925.00	\$277.50 \$555.00	review revised discovery meet and confer letter re access improvement discovery, updated class list, and defense expert Anderson materials review discovery meet and confer letter to Brookdale re updated resident list, access improvements, production of defense expert Anderson materials
Brian Umpierre	3/9/2023	0.50	\$925.00	\$462.50	review defendants' motion to stay discovery review Order granting Defendants' motion to stay discovery pending ruling on class certification
Kathryn Stebner	3/10/2023	0.50	\$1,300.00	\$650.00	
Kathryn Stebner Brian Umpierre	3/10/2023 3/10/2023	0.30	\$1,300.00 \$925.00	\$390.00 \$462.50	meet with B. Umpierre on Order granting Defendants' motion to stay discovery pending class certification ruling review Order granting Defendants' motion to stay discovery pending class certification ruling and team email correspondence re-same
Brian Umpierre Brian Umpierre	3/17/2023 3/17/2023	0.50	\$925.00 \$925.00	\$462.50 \$185.00	team call re case status, discovery stay, motion(s) for summary judgment review discovery review/status memo in advance of team call re same
Kathryn Stebner	3/18/2023	0.40	\$1,300.00	\$520.00	meet with B. Umplerre re case status, discovery stay, and motion for summary judgment review class certification order
Kathryn Stebner	3/30/2023	2.00	\$1,300.00	\$2,600.00	
Kathryn Stebner	3/30/2023	0.60	\$1,300.00	\$780.00	discussion with G. Wallace and B. Umpierre of class certification order review class certification order, email/phone calls with K. Stebner and G. Wallace re surviving class claims and strategy
Brian Umpierre	3/30/2023	7.10	\$925.00	\$6,567.50	
Brian Umpierre	3/30/2023	0.70	\$925.00 \$925.00	\$647.50 \$3,237.50	team call re order granting (b)/(2) class certification and denying (b)/(3) classes review/edit/comment on Rule 2/4/10 edition: emails to G. Wallace and M. Johnson re-same
Brian Umpierre Kathryn Stebner	4/2/2023 4/3/2023	3.50 0.50	\$1,300.00	\$650.00	review draft Rule 23 petition for review denial of class certification
Brian Umpierre	4/3/2023	3.40	\$925.00	\$3,145.00	draft CLRA section of 23(f) petition; legisl research re same team call re Rule 23(f) petition
Brian Umpierre	4/3/2023	1.00	\$925.00	\$925.00	
Kathryn Stebner	4/4/2023	0.30	\$1,300.00	\$390.00	meet with 8. Umplerer re draft Rule 23 pebition re denial of class cert
Brian Umpierre	4/4/2023	4.30	\$925.00	\$3,977.50	draft CLRAI/fraud insent for Rule 23(f) pebition; legal research re same
Brian Umpierre	4/5/2023	9.30	\$925.00	\$8,602.50	draft Rule 23(f) Reply - misrepresentation and omissions and predominance insert
Brian Umpierre	4/6/2023	4.20	\$925.00	\$3,885.00	draft Rule 23(f) Reply - misrepresentation and omissions and predominance insert
Brian Umpierre	4/6/2023	0.50	\$925.00	\$462.50	team call re appellate petition status, further strategy on class certification in district court
Brian Umpierre	4/6/2023	2.60	\$925.00	\$2,405.00	review / edit operative Rule 23(f) draft; email to G. Wallace re same
Brian Umpierre	4/7/2023	5.00	\$925.00	\$4,625.00	draft shortened version of Rule 23(f) insert; forward same to group for review and comment
Kathryn Stebner	4/10/2023	0.40	\$1,300.00	\$520.00	review B. Umplierre memo re appeal, case status / strategy
Brian Umpierre Brian Umpierre	4/10/2023 4/10/2023	0.70	\$925.00 \$925.00	\$647.50 \$5,827.50	team call reappeal, status, strategy reviewledit to latest draft of Rule 23(f) petition
Brian Umpierre Brian Umpierre	4/10/2023 4/12/2023	0.30	\$925.00 \$925.00	\$277.50 \$3,515.00	discuss draft Rule 23(f) petition with K. Stebner (estal research / case cites for CLPA insert in Rule 23(f) petition
Brian Umpierre	4/12/2023 4/12/2023	0.50	\$925.00 \$925.00	\$462.50 \$555.00	tegine transcribe Caste many and Caste Market in the Lady position review draft CMC statement; each Go, Wallace re same team call its assessibilities of states of the Control of the Cont
Brian Umpierre Brian Umpierre	4/12/2023	0.60 1.50	\$925.00	\$1,387.50	team can re appear satus strategy review/edits to operative draft of Rule 23(f) petition review draft Rule 23(f) betition and discussion with B. Umolerre re same
Kathryn Stebner	4/13/2023	0.30	\$1,300.00	\$390.00	review operative draft of 23(f) petition; comments to G. Wallace
Brian Umpierre	4/13/2023	1.10	\$925.00	\$1,017.50	
Brian Umpierre	4/13/2023	0.50	\$925.00	\$462.50	team call re Rule 20(f) pebtion and CMC Statement - status legial research re class certification evidence sufficient to demonstrate predominance and standing
Brian Umpierre	4/17/2023	1.00	\$925.00	\$925.00	
Brian Umpierre	4/17/2023	0.80	\$925.00	\$740.00	team call re procedural strategi/case management conference request Legal research re successive class certification motions, leave to amend, permissive joinder.
Brian Umpierre	4/19/2023	6.50	\$925.00	\$6,012.50	
Brian Umpierre	4/20/2023	6.00	\$925.00	\$5,550.00	legial research and email memo re leave to amend the complaint to add new class reps and then seek facility-level class certification legial research re successive class certification motions, leave to amend, permissive joinder and memo re same to G. Wallace and team
Brian Umpierre	4/20/2023	5.50	\$925.00	\$5,087.50	
Brian Umpierre	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 Umpierre	4/21/2023	2.60	\$925.00	\$2,405.00	legal research re injunctive relief by estate
Brian Umpierre Kathryn Stebner	4/21/2023 4/24/2023	1.10	\$925.00 \$1,300.00	\$1,017.50 \$650.00	team call re-some management content or startery review Detendants' opposition to Rule 23 petition for review
Kathryn Stebner Brian Umpierre	4/24/2023 4/24/2023	0.30	\$1,300.00 \$1,300.00 \$925.00	\$390.00 \$370.00	review beam emails or status of new 2a person for review with 8. Umplierre review beam emails or status of new polarity outrests. A processor of the status of new polarity outrests have review beam emails or status of new polarity outrests have polarity outrests.
Brian Umpierre	4/24/2023 4/24/2023 4/25/2023	1.00	\$925.00 \$925.00 \$925.00	\$925.00 \$1,110.00	review Rule 23(f) Opposition
Brian Umpierre Brian Umpierre	4/25/2023	0.50	\$925.00	\$462.50	review 23(f) Opposition; notes re same team zoom receive was not some control of the control of
Brian Umpierre	4/25/2023	0.40	\$925.00	\$370.00	email with internal staff re communication with putative class member re status of class action case
Brian Umpierre	4/26/2023	4.80	\$925.00	\$4,440.00	draft inserts for 23(f) reply re CLRA and Elder Abuse claims; emails and phone calls with G. Wallace re same
Brian Umpierre	4/27/2023	4.50	\$925.00	\$4,162.50	draft inserts for 23(f) reply re CLRA and Elder Abuse claims; emails and phone calls with G. Waltace re same
Brian Umpierre	4/28/2023	7.00	\$925.00	\$6,475.00	draft CLRA portion of Rule 23(f) Reply; team Zooms re same; phone calls with G. Waltace re same
Brian Umpierre	4/29/2023	7.00	\$925.00	\$6,475.00	draft CLRA portion of Rule 23(f) reply; team Zooms re same; phone calls with G. Wallace re same
Kathryn Stebner	4/30/2023	0.50	\$1,300.00	\$650.00	meet with B. Umplerre re Elder Abuso/CLRA portions of Rule 23 Reply
Brian Umpierre	4/30/2023	0.40	\$925.00	\$370.00	phone call with G. Wallace re Reply in support of Rule 23(f) pebtion phone call with K. Stebner re Elder Abuse/CLPA portions of Rule 23(f) Reply
Brian Umpierre	4/30/2023	0.50	\$925.00	\$462.50	
Brian Umpierre Brian Umpierre	5/8/2023 5/25/2023	0.80	\$925.00 \$925.00	\$740.00 \$277.50	person to the man in Joseph I to Laboral Policies before provinting or lines. Deli yi spely review draft minor nequestaling noting or certification of 10 [10]; col ass emails with 8. Bien-Kahn re reply in support of limited (b)/2] class notice
Kathryn Stebner Brian Umpierre	5/26/2023 5/26/2023	0.80 0.40	\$925.00 \$1,300.00 \$925.00	\$277.50 \$1,040.00 \$370.00	emails with its little-marker length in support or limiting (o)(2) class notice review memor exalibility of limited class notice phonon call with B. Bien-fath in respirity in support of (b)(2) class notice
Brian Umpierre	5/26/2023	0.40	\$925.00	\$370.00	phone call with B. Blein-Main fer reply in support of (b)(2) class notice
Brian Umpierre	5/26/2023	5.30	\$925.00	\$4,902.50	review insert re-application of Pan Am for non-certified claims for insert in reply for request to notice to certified (b)(2) class; related legal research; draft insert
Kathryn Stebner	5/30/2023	1.00	\$1.300.00	\$1,300.00	review draft motion seekinel limited notice to (b)(2) class
Brian Umpierre	5/30/2023	0.60	\$925.00	\$555.00	review final draft of reply iso class notice
Kathryn Stebner Brian Umpierre	5/31/2023 5/31/2023	0.40	\$1,300.00 \$925.00	\$520.00 \$370.00	meet with B. Umplerre re denial of Rule 23 petition re denial of class certification - analysis and strategy re same review order denying Rule 23(1) petition for review; email to K. Stebner re same
Kathryn Stebner	8/7/2023	0.60	\$1,300.00	\$780.00	meet with B. Umpierre re plan to lift discovery stay, request further CMC, and proposed case schedule going forward meeting with K. Stebner re discovery stay and proposed case schedule going forward
Brian Umpierre	8/7/2023	0.60	\$925.00	\$555.00	
Brian Umpierre	8/8/2023	0.30	\$925.00	\$277.50	review draft administrative motion to lift discovery stay and set further case management conference

Brian Umpierre	8/10/2023	0.20	\$925.00	\$185.00	review meet and confer correspondence re filing admininstrative motion to lift discovery stay and further case management conference
Brian Umpierre Kathryn Stebner	8/23/2023 8/25/2023	0.30	\$925.00 \$1,300.00	\$277.50 \$520.00	Internal email: correspondence re case / motion schedule going forward review case management conference summany memo including overall status and next steps re class certification and schedule
Brian Umpierre Brian Umpierre	8/25/2023 8/25/2023	2.20	\$925.00 \$925.00	\$2,035.00	legal research re whether claim for injunctive relief survives deceased plaintiff; email to G. Wallace re same
Brian Umpierre	8/31/2023	0.70	\$925.00	\$647.50	phone call with G. Wallace re upcoming case management confence and next steps/strategy in light of class certification status and rulings read/review 8/24 case management conference transcript re-potential for subclasses
Brian Umpierre Brian Umpierre	8/31/2023 9/8/2023	0.50 1.00	\$925.00 \$925.00	\$462.50 \$925.00	telephone call with putative class member re case status team call re status/case schedule/briefing assignments - strategy in light of class certification rulings
Kathryn Stebner Brian Umpierre	9/10/2023 9/11/2023	0.50	\$1,300.00 \$925.00	\$650.00 \$462.50	meet with B. Umpierre plan for renewed motion for class certification and summary judgment motions meeting with B. Stehner re-renewed motion for class certification
Kathryn Stebner	9/20/2023	0.30	\$1,300.00	\$390.00	discuss certifiability of financial elder abuse claim with B. Umpierre
Brian Umpierre Brian Umpierre	9/20/2023 9/20/2023	0.50	\$925.00 \$925.00	\$462.50 \$277.50	phone call with G. Wallace re renewed class cert motion - assigned tasks email correspondence with G. Wallace and M. Johnson re feasibility of pursuing class elder financial abuse claim given case history
Brian Umpierre Brian Umpierre	9/21/2023 9/22/2023	0.50 1.10	\$925.00 \$925.00	\$462.50 \$1,017.50	review G. Wallace outline re new class cert motion / motion for subclasses
Brian Umpierre Brian Umpierre	9/25/2023	6.70	\$925.00	\$6,197.50	team call re renewed class certification subclasses motion, motion for summary judgment, and assigned tasks / strategy for completion draft Flores supporting declaration re new motion for certification of subclasses
Brian Umpierre Brian Umpierre	9/26/2023 9/26/2023	0.50	\$925.00 \$925.00	\$462.50 \$462.50	emails to experts (Flores (staffing), Kennedy (damages)) re further supporting declarations in support of new moion for certification of subclasses 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 Umpierre	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 Umpierre Brian Umpierre	9/26/2023 9/26/2023	3.30 5.70	\$925.00 \$925.00	\$3,052.50 \$5,272.50	Revised draft Flores class certification declaration on subclasses theory Revised draft Flores class certification declaration on subclasses theory Revised draft Schrower class certification declaration on subclasses theory
Brian Umpierre Brian Umpierre	9/27/2023 9/27/2023	3.90 6.80	\$925.00 \$925.00	\$3,607.50 \$6,290.00	Revised draft Flores class certification declaration on subclasses theory Revised draft Schrover class certification declaration on subclasses theory
Brian Umpierre	9/28/2023	0.40	\$925.00	\$370.00	emails with D. Marks and J. Thornyon re Dr Flores' resident disability profiles
Brian Umpierre Brian Umpierre	9/29/2023 9/29/2023	2.50	\$925.00 \$925.00	\$2,312.50 \$1,202.50	legial research re Supreme Court's decision in Geraghty and ability to pursue injunctive relief by way of sublicasses after prior denial of certification; discussion with G. Wallace re same team Zoom re strategy and status of tasks on renewed motion for certification of subclasses
Brian Umpierre	9/29/2023	2.10	\$925.00	\$1,942.50	draft Flores expert declaration supporting new motion for certification of subclasses
Brian Umpierre Brian Umpierre	9/29/2023 9/29/2023	1.00 0.50	\$925.00 \$925.00	\$925.00 \$462.50	team call - cases status and strategy, move in fees review team correspondence re edits/thoughts to draft class certification outline and count/counter point re same
Brian Umpierre Brian Umpierre	9/30/2023 9/30/2023	3.00 4.50	\$925.00 \$925.00	\$2,775.00 \$4,162.50	draft Flores expert declaration in support of new motion for certification of subclasses legal research re Supreme Court's decision in Geraghty and ability to pursue injunctive relief by way of sublicasses after prior denial of certification
Brian Umpierre	10/1/2023	4.50	\$925.00	\$4,162.50	Geraghty-related legal research re class certification, subclasses, and mootness
Kathryn Stebner Brian Umpierre	10/2/2023 10/2/2023	2.00 8.50	\$1,300.00 \$925.00	\$2,600.00 \$7,862.50	review draft supplemental expert declarations supporting renewed subclasses motion (Flores, Schroyer, Kennedy) Geraghty-related legal research and draft insert re motion for leave for certification subclasses
Brian Umpierre Brian Umpierre	10/3/2023 10/3/2023	5.30 2.90	\$925.00 \$925.00	\$4,902.50 \$2,682.50	edits to expert declaration of P. Kennedy in support of new motion for certification of subclasses edits to Flores expert declaration in support of new motion for certification of subclasses
Brian Umpierre	10/3/2023	0.20	\$925.00	\$185.00	discussion with G. Grunfeld re Plaintiff Schmidt/H. Fisher and willingness to proceed
Brian Umpierre Brian Umpierre	10/4/2023 10/4/2023	3.10 0.40	\$925.00 \$925.00	\$2,867.50 \$370.00	edits to Flores expert declaration in suppot of new motion for certification of subclasses team email correspondence re remixed class certification motion - permission to file and styling of same
Brian Umpierre Brian Umpierre	10/4/2023 10/5/2023	0.30 6.40	\$925.00 \$925.00	\$277.50 \$5,920.00	email correspondence with G. Wallace, D. Marks, and J. Thornton re numerosity of disabled residents finalize edits to revised Flores expert declaration and forward to G. Wallace for review and comment
Brian Umpierre	10/5/2023	0.40	\$925.00	\$370.00	discussion with G. Wallace re application of Geraghty and request for subclasses, mootness
Brian Umpierre Brian Umpierre	10/5/2023 10/6/2023	2.40 1.50	\$925.00 \$925.00	\$2,220.00 \$1,387.50	further edits to expert Kennedy declaration; forward to G. Wallace for review and comment 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 Umpierre	10/6/2023 10/6/2023	0.60	\$925.00 \$925.00	\$555.00 \$370.00	phone calls with G. Wallace re elder abuse claim and meaning of funds of an elder
Brian Umpierre Brian Umpierre	10/6/2023	0.40 0.80	\$925.00	\$740.00	further edits to reised Flores expert declaration re assisted living background facts further edits to Kennedy expert declaration re community fee evidence; forward same to P. Kennedy for review and comment
Brian Umpierre Brian Umpierre	10/6/2023 10/6/2023	0.60 1.00	\$925.00 \$925.00	\$555.00 \$925.00	further edits to Schroyer expert declaration team call - status of assignments re motion for certification of subclasses and further strategy
Brian Umpierre	10/6/2023	1.60	\$925.00	\$1,480.00	phone call with J. Thornton re Flores expert declaration edits, support, and additional requirements
Brian Umpierre Brian Umpierre	10/6/2023 10/6/2023	0.70 2.30	\$925.00 \$925.00	\$647.50 \$2,127.50	discussion with counsel re financial elder abuse claim with non-elder payors; review Cork case further edits to Flores expert declaration based on call with J. Thornton
Brian Umpierre Kathryn Stebner	10/6/2023 10/7/2023	1.20 0.30	\$925.00 \$1,300.00	\$1,110.00 \$390.00	Shepherdize Geraghty Supreme Court case and find similar authorities discuss with B. Umpierre elder abuse claim based on other payors
Brian Umpierre	10/7/2023	0.30	\$925.00	\$277.50	phone call with G. Wallace re Flores and Schroyer expert declaration status and non-elder payors research re elder abuse class claim
Brian Umpierre Brian Umpierre	10/7/2023 10/9/2023	7.50 8.20	\$925.00 \$925.00	\$6,937.50 \$7,585.00	further edits to Schroyer expert declaration Flores expert declaration edits, forward to J. Thornton and G. Wallace for review and comment
Brian Umpierre Brian Umpierre	10/9/2023	0.70 5.50	\$925.00 \$925.00	\$647.50 \$5.087.50	legal research re regulations requiring records of community fees and email to G. Wallace re same, re motion for certification of subclasses edits to draft Geraghty insert for motion for leave for subclasses based on phone call with G. Wallace re same
Brian Umpierre	10/10/2023	1.20	\$925.00	\$1,110.00	further edits to Kennedy expert declaration and forward same to P. Kennedy and G. Wallace for review and comment
Brian Umpierre Brian Umpierre	10/10/2023 10/11/2023	0.40 1.00	\$925.00 \$925.00	\$370.00 \$925.00	review administratore motion to exceed page limitation and email to M. Johnson re same team call re status and update on assignments re motion for certification of subclasses
Brian Umpierre Brian Umpierre	10/11/2023 10/11/2023	1.80 5.90	\$925.00 \$925.00	\$1,665.00 \$5,457.50	review and comment on operative draft of motion for leave for subclasses edit and revise previous Jones declaration in support of class certification to conform to motion for certification of subclasses
Kathryn Stebner	10/12/2023	0.50	\$1,300.00	\$650.00	review operative draft of motion for leave for subclasses
Brian Umpierre Brian Umpierre	10/12/2023 10/12/2023	4.70 0.70	\$925.00 \$925.00	\$4,347.50 \$647.50	edit and revise previous Belson declaration in support of class certification to conform to motion for certification of subclasses email correspondence with G. Wallace re declarant testimony that they would not have paid had they been given complete information
Brian Umpierre Brian Umpierre	10/13/2023 10/13/2023	1.00	\$925.00 \$925.00	\$925.00 \$925.00	Call with G. Wallace, M. Johnson, J. Thornton, D. Marks re staffling expert declarations in support of motion for leave to file motion for certification of subclasses team call re status and update on assignments re motion for leave to file motion for certification of subclasses
Brian Umpierre Brian Umpierre	10/13/2023	5.30	\$925.00	\$4,902.50	team cast restants and update on assignments re motion for leave to the motion for cremication of subclasses Belson and Jones expert declaration edits to conform to motion for leaves to file motion for certification of subclasses
Brian Umpierre Brian Umpierre	10/14/2023 10/14/2023	0.50 1.70	\$925.00 \$925.00	\$462.50 \$1,572.50	phone call with J. Thornton re Flores expert declaration edits and resident disability profile 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 Umpierre	10/15/2023	0.50	\$925.00	\$462.50 \$555.00	phone call with G. Wallace re update on status of staffing-related expert declarations (Flores, Schroyer, Belson, Jones)
Brian Umpierre Brian Umpierre	10/16/2023 10/16/2023	0.60 2.20	\$925.00 \$925.00	\$2,035.00	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 further Belson expert declaration edits re motion for leave to file motion for certification of subclasses
Brian Umpierre Brian Umpierre	10/16/2023 10/16/2023	1.50 2.50	\$925.00 \$925.00	\$1,387.50 \$2,312.50	further Jones expert declaration edits re motion for leave to file motion for certification of subclasses further edits to 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 Umpierre	10/16/2023	1.10	\$925.00	\$1,017.50	review and comment on operative draft of brief in support of motion for leave to file motion for certification of subclasses; forward to G. Wallace
Brian Umpierre Brian Umpierre	10/16/2023 10/17/2023	1.70 0.30	\$925.00 \$925.00	\$1,572.50 \$277.50	discussion with G. Wallace re damaeges expert Kennedy's analysis and testimony re community fee - reviewand compare with testimony proffered in similar understaffing litigation and email to G. Wallace re same 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 Umpierre Brian Umpierre	10/17/2023 10/17/2023	0.30 5.30	\$925.00 \$925.00	\$277.50 \$4,902.50	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 review operative draft of motion for leave to file motion for certification of subclasses, insert Riores'Schroyer/Jones/Belson expert declaration citations
Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023	0.30 5.30 0.20 1.10	\$925.00 \$925.00 \$925.00 \$925.00	\$277.50 \$4,902.50 \$185.00 \$1,017.50	email to B. Ellen-Cathon r DSS citations as support to Dr. Florier opertropinose in discussion supporting motions for laws to file motion for craffication of subclasses review operative duri of motion for in term let be mission from critications of subclasses, sensor Florieroschicheryor/lamos-ellison oper discussion critications email to P. Exemedy as status check on draft declaration in support of motion for leave to file motion for certification of subclasses review and desits to all reductionation of Del exercisions are support of motion for leave the life motion for certification of subclasses
Brian Umpierre Brian Umpierre Brian Umpierre	10/17/2023 10/17/2023 10/17/2023	0.30 5.30 0.20	\$925.00 \$925.00 \$925.00	\$277.50 \$4,902.50 \$185.00	email to B. Blem Lish in EDSC states as support for ID. Places' epert opinions in declaration supporting motion for leave to Bile motion for certification of subclasses review operative dat of motion for leave to Bile motion for certification at subclasses, inview operative dat of motion for leave to Bile motion for certification or subclasses. Inview Toward School provides the certification or subclasses motion for certification or subclasses. Many of the motion for certification or subclasses are subclasses and the subclasses are subclasses.
Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Kathryn Stebner	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00	\$277.50 \$4,902.50 \$185.00 \$1,017.50 \$370.00 \$925.00 \$520.00	email to B. Eller-Chain v DSS citations as support for Dr. First's opent opinions in declaration supporting motion for lawns to Be motion for confliction of subclasses review operative during of motion for interes the form oble for certification obstaclases, terms Firety-Bridgery/Interval-Bridger per-declaration citations email to P. Kennedy in status clean on draft declaration in support of motion for lawns to bits motion for certification of status cleans and the status of the status o
Brian Umpierre Kathryn Stebner Kathryn Stebner Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023 10/18/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 13.00	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00	\$277.50 \$4,902.50 \$185.00 \$1,017.50 \$370.00 \$925.00 \$520.00 \$390.00 \$12,025.00	email to B. Blee Cabin e DSS citations as support for Dr. First opent opinions in declaration supporting motions for laws to file motion for certification of subclasses review operative during of motions for its error for incombine recreations on subclasses, serview operations during or motion for its error for subclasses, serview operations of subclasses are recreated in the subclasses of subclasses are recreated in the subclasses of subclasses are recreated in the subclasses of subclasses are review and dest to a distributional subclasses are recreated in the subclasses of subclasses phones certified in the subclasses of subclasses are recreated in the subclasses are recreated in the subclasses are recreated in the subclasses of subclasses of subclasses are recreated in the subclasses of subclasses of subclasses are recreated in the subclasses of subclasses of subclasses are recreated in the subclasses of subclasses of subclasses of subclasses are recreated in the subclasses of sub
Brian Umpierre Kathryn Stebner Kathryn Stebner Brian Umpierre Brian Umpierre Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$1,300.00	\$277.50 \$4,902.50 \$185.00 \$1,017.50 \$370.00 \$925.00 \$520.00 \$390.00	email to B. Eller-Cathor PDSS citations as support for ID. Filter's epert opinions in discardants supporting motions for laws to file motion for certification of subclasses review operative dud in from loth for its term filter in motion for certification of subclasses, seen Filter's purplement of support discardants on statistications of subclasses and the PDSS filter's purplement of subclasses and the PDSS filter's purplement of subclasses and the PDSS filter's purplement of subclasses review and desits to disclassation for like or consumer survey in support of motion for learn found for restriction of subclasses phone call with O. Williace re dark filted declarations re consumer survey in support of motion for learn found for restriction of subclasses phone call with one post Defen and PL Remedy (Williace, R. Hanner). Check, P. Pettier et druft Bed and Remedy declarations support motion for certification of subclasses review open the did not disclassion in support of motion for subclasses (PDSS filter's expense). The properties of the disclass filter in support of motion for subclasses (PDSS filter's expense) and the control of the subclasses (PDSS filter's expense). The properties of the disclass filter's expense of the subclasses (PDSS filter's expense) and the subclasses (PDSS filter's expense).
Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Kathryn Stebner Kathryn Stebner Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023 10/18/2023 10/19/2023 10/20/2023 10/20/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 13.00 9.00 0.40 0.20	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00	\$277.50 \$4,902.50 \$1,902.50 \$1,017.50 \$370.00 \$925.00 \$520.00 \$390.00 \$12,025.00 \$370.00 \$370.00	email to 8. Blen chain ve DSS citations as support for Dr. First's opent opinion in declaration supporting motion for lawns to the motion for certification of subclasses review operative during of motions for lawns to the motion for certification or subclasses, seen Firety-open declaration citations are motion of the production of the subclasses of the
Brian Umpierre Kathryn Stebner Kathryn Stebner Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 13.00 9.00 0.40 0.20 0.90 0.90	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$277.50 \$4,902.50 \$185.00 \$1,017.50 \$370.00 \$925.00 \$380.00 \$380.00 \$2,025.00 \$370.00 \$12,025.00 \$370.00 \$185.00 \$482.50	email to 8. Bites chain re DSS citations as support for Dr. Firet's open reprise one indexation supporting motion for lown to file motion for certification of subclasses review operative during of motions for its resist for motion for certification obstinates and to 19. Kennedy in status cheen on dark declaration is support of motion for less the less file motion for certification of status classes; services and early to exhibit exclusions of 19. Most excustors anyway in apport of motion for less and the file motion for certification of status for services and certification of status classes and the services and certification of status for exemptions and the services and certification of status for exemptions and the services and certification of status for services and the services of the services of the services of status for services of the
Brian Umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 13.00 9.00 0.40 0.20 0.50	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$277.50 \$4.902.50 \$185.00 \$1,017.50 \$370.00 \$925.00 \$390.00 \$12,025.00 \$3,225.00 \$370.00 \$185.00 \$185.00 \$185.00	email to B. Bies claim e DSS citations as support for Dr. First opent opinions in declaration supporting motion for laws to file motion for certification of subclasses review operated was did not motion for certification of subclasses, sens First-expection-purpose. All other provided countries of the control of the cont
Brian Umpierre Kothryn Stebner Kothryn Stebner Brian umpierre Kathryn Stebner Kathryn Stebner Kathryn Stebner Brian umpierre	10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/17/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/18/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023 10/20/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 13.00 9.00 0.40 0.20 0.50 1.30 0.50 1.30	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$925.00	\$277.50 \$1,902.50 \$1,902.50 \$1,017.50 \$370.00 \$925.00 \$390.00 \$390.00 \$390.00 \$370.00 \$370.00 \$38,225.00 \$3185.00 \$3185.00 \$325.00 \$325.00 \$325.00 \$325.00 \$325.00 \$325.00 \$325.00	email to B. Bien Cahn re DSS citations as support for ID. First open topinions in declaration supporting motion for laws to file motion for certification of subclasses review operated was for motion for in term for incoming to evaluations, seen proceedings of subclasses, seen processing or efficient processing or efficient processing or expension of subclasses review and delta to dat declaration in support and processing or expension of subclasses phone cell with One processing or expension of subclasses in the contract of subclasses phone cell with One processing or expension of subclasses in the contract of subclasses phone cell with one processing or delta of the form of the Certification of subclasses phone cell with one processing or delta of the form of the delta o
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Bana Umpierre Kathyn Bebeer Kathyn Bebeer Bana Umpierre	1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1018/2023 1018/2023 1018/2023 1018/2023 1018/2023 1019/2023	0.30 5.30 0.20 1.10 0.40 1.00 0.30 13.00 9.00 0.40 0.20 0.90 0.50 0.50 0.50 0.40 0.50 0.50 0.50 0.5	\$925.00 \$925.00	\$277.50 \$1,907.50 \$1,917.50 \$377.00 \$9275.00 \$3270.00 \$350.00 \$350.00 \$350.00 \$370.00	email to B. Billes chain re DSS citations as support for Dr. Piters' opertropinose in declaration supporting motion for laws to the immotion for certification of subclasses review operated was did not motion for its reside to subclasses, sens of Teverity organization of subclasses. The review operated was did not discussion of its description is support of motion for leave to the motion for certification of subclasses review and dest to did noticeations of the discussion of subclasses upon the control of the subclasses of the s
Bana Umpierre Kathyn Bebene Kathyn Bebene Bana Umpierre	1017/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 10117/70023 1017/70023	0.30 5.30 0.20 1.10 0.40 1.00 0.40 0.30 9.00 0.40 0.20 0.50 1.30 0.50 1.30 0.50 0.50 0.50 0.50 0.50 0.50 0.50 0	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$13,000.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$277.50 \$1,957.50 \$1,957.50 \$377.00 \$327.00 \$325.00 \$320.00 \$330.00 \$32,025.00 \$377.00 \$377.00 \$322.50 \$377.00 \$322.50 \$325.00	email to B. Billen Calahn et DSS citations as support for Dr. Peters depert opinions in declaration supporting motion for lawn to file motion for certification of subclassass review operated was due for motion for its en
Brain Umpierre	1017/70023 1017/70023	0.30 0.30 0.20 1.10 0.40 1.00 0.40 1.30 0.40 0.30 0.40 0.20 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$925.00 \$925.00	\$277.50 \$1,902.50 \$1,917.50 \$370.00 \$202.50 \$370.00 \$270.00 \$270.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$38.225.00 \$370.00 \$382.50 \$370.00 \$382.50 \$370.00 \$382.50 \$370.00 \$382.50 \$370.00	email to 8. Blen chain re DSS citations as support for Dr. Firster opert opinions in declaration supporting motion for lawns to file motion for the reside to first opert opinions in declaration supporting motion for lawns to file motion for schild to the collection of subclasses. **Review operative during of motion for lawns to file consistency or support of motion for lawns to file motion for certification of subclasses. **Review and set that of a discussation of Dest declarations in support of motion for lawns to file motion for certification of subclasses. **Review and set that of a discussation in operation of motion for subclasses. **Review and set that of a discussation is support of motion for lawns to file motion for subclasses. **Provide operation of and declaration in support of motion for subclasses. **Provide operation of and declaration in support of motion for subclasses. **Review operation during declaration of subclasses. **Review operation of subclass
Brian Umpierre Bran Umpierre	1017/70023 1017/70023	0.30 0.30 0.20 1.10 0.40 1.00 0.40 1.30 0.40 0.20 0.40 0.20 0.40 0.50 0.40 0.50 0.40 0.50 0.40 0.50 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40 0.70 0.40	\$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,200.00 \$1,200.00 \$925.00	\$277.50 \$310.50 \$310.50 \$310.50 \$31.017.30 \$370.00 \$52	email to B. Bien chain re DSS citations as support for Dr. Firet's open reprise open reprise contained and production of lawn to the motion for certification of subclasses review operative and of notion for intered to the motion for certification of subclasses, seen Firety-discrypt/sms-distioned provided carriages and contained to the control of subclasses phone. Certification of subclasses, phone. Certification of subclasses, phone. Certification of subclasses phone. Certification of subclasses, certification of subclasses phone. Certification of subclasses, certification of subclasses, certification of subclasses. In the control of the control of subclasses and certification of subclasses. In the control of subclasses are certification of subclasses, cuttoms. Feature and subclasses, certification of subclasses, cuttoms. Feature and subclasses and reductions and fereat declarations and reductions and fereat declarations and reductions and fereat declarations and fereat declarations and reductions and fereat declarations and reductions. Feature and subclasses are declarations and fereat
Brian Umpierre	1017/70023 1017/70023	0.30 0.30 0.20 1.10 0.40 1.00 0.40 0.30 1.30 0.40 0.30 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$972.00 \$972.00 \$972.5	\$277.50 \$4,902.50 \$115.50 \$370.00 \$370.00 \$925.50 \$570.00 \$570	email to B. Bien chain re DSS citations as support for Dr. Firet's open opinions in declaration supporting motion for laws to file motion for certification of subclasses review operative and of no motion for its reside in motion for certification of subclasses. In the property of the control of the contro
Brian Umpierre	1017/7023 1017/7023	0.30 0.30 0.30 0.20 1.10 0.40 1.00 0.40 0.30 1.30 0.40 0.20 0.50 0.40 0.20 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$925.00 \$925.00	\$277.50 \$4,902.30 \$110.50 \$110.75 \$270.00 \$20.50 \$20.50 \$3	email to 8. Blen chain re 055 citations as support for Dr. Firet's open opinion in declaration supporting motion for lawns to file motion for an inchain common for certification or busidesses. **review operative during of motion for lawns to file motion for certification or busidesses. **review operative during of motion for file the file consistence grows a page of an inchain control file and the control file of the con
Brian Umpierre Bran Umpierre	1017/70023 1017/70023	0.30 0.30 0.20 1.10 0.40 1.00 0.40 0.30 0.40 0.20 0.50 0.50 0.50 0.40 0.80 0.40 0.80 0.40 0.80 0.40 0.80 0.40 0.80 0.40 0.80 0.40 0.80 0.8	\$925.00 \$925.00	\$277.50 \$4,902.50 \$115.50 \$13.017.50 \$370.00 \$502.50 \$	email to 8. Bites chain re DSS citations as support for Dr. Firet's open reprise in declaration supporting motion for lawn to file motion for certification of subclasses. review operative during of motion for intered to the form color for certification of subclasses. mail to P. Kennedy's status check on dark declaration in support of motion for leave to file motion for certification of subclasses. review and cells to del reclarations of post of certification of subclasses. review and cells to del reclarations in post of certification of subclasses. review and cells to del reclarations in post of certification of subclasses. phone call with poper to Pike size of Pike size of the subclasses of the sub
Brian Umpierre Bran Umpierre B	1017/70023 1117/70023 1117/70023 1117/70023 1117/70023 1117/70023	0.30 0.30 0.30 0.20 1.10 0.40 1.00 0.40 0.30 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$9225.00 \$9225.00	\$277.50 \$45,002.30 \$110.00 \$110.00 \$110.00 \$110.00 \$110.00 \$10.00	email to B. Bien chain re DSS citations as support for Dr. Firet's open reprise open reprise contained and production of lawn to the motion for certification of subclasses. review operative dark of motion for its reside in motion for certification of subclasses, seen Firety-Recognized productions contained to the control of subclasses phone. Get with the control of the control of the control of the control of subclasses phone. Get with the control of subclasses phone. Get with the control of the
Brian Umpierre Bran Umpierre B	1017/70023 11/70023 11/70023 11/70023 11/70023 11/70023 11/70023 11/70023 11/70023	0.30 0.30 0.20 1.10 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$9225.00 \$9225.00	\$277.50 \$45,002.50 \$110.50 \$110.50 \$110.50 \$110.50 \$110.50 \$10.00	email to 8. Elect Adam to 805 citations as support for Dr. First's open opinion in declaration supporting motion for lawns to file motion for an exhibition of subdiscass. **Review operative during of motion for insteal to file motion for certification or subdiscass. **Review operative during of motion for file the file consistence and support of motion for lawn to file motion for certification of subdiscass. **Review and end to all of excessions of Dr. Bernard of the continues and the motion for the subdiscass. **Review and end to all of excessions of Dr. Bernard of the subdiscass of the subdisc
Brian Umpierre Bran Umpierre	1017/70023 1117/70023 1117/70023	0.30 0.30 0.20 1.10 0.40 0.40 0.40 0.50 1.30 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$922.5.00 \$922.5.00	\$277.50 \$4.802.50 \$110.75 \$1.07.75 \$1.0	email to 8. Bien chain re 055 citations as support for Ch. Firet's open reprise in declaration supporting motion for lawn to file motion for certification of subclasses. **review operative duri of motion for instead in the motion for certification of subclasses, seen Firet's open declaration citations are not supported on the property of the control of the contro
Brian Umpierre Bran Umpierre	1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1018/70023	0.30 0.30 0.20 1.10 0.00 0.00 0.00 0.00 0.00 0.0	9025.00 9025.00	\$277.50 \$45,002.50 \$110.00 \$20	email to 8. Bien chain re 055 citations as support for Ch. Firet's open reposition in diseased in the motor for leave to the immotor for certification of subclasses review operative dark of motor for interes the form office or feet interest on such as the control of the contr
Brian Umpierre Bran Umpierre B	1017/70023 1117/70023 1117/70023	0.30 0.30 0.20 1.10 0.40 0.40 0.30 1.30 0.40 0.30 1.30 0.40 0.30 1.30 0.40 0.50 0.30 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0.5	99725.00 90725.00	\$277.50 \$45,002.50 \$110.00 \$21	email to B. Bien chain re DSS citations as support for Dr. Firet's open opinion in declaration supporting motion for lawn to the motion for certification of subclasses. review operative during of an obstance in control in the lawn for motion for certification or subclasses, seen Firet's profit only with the control in the lawn for certification of subclasses review and deat so of ant declaration in support of motion for lawn for lifet motion for certification of subclasses phone. Get with The subclasses of the firet counters are vary in support of motion for lawn for the motion for certification of subclasses phone. Get with The State of the declaration in commerce survey in support of motion for lawn for the motion for certification of subclasses phone. Get with The State of the subclasses are survey only to the subclasses purport motion for lawn for lawn for the subclasses phone. Get with The State of the subclasses in the subclasses of the subclass
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Brian Umpierre Bran Umpierre	1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1018/70023 118/70023	0.30 0.30 0.20 1.10 0.00 0.00 0.00 0.00 0.00 0.0	9925.00 9925.00	\$277.50 \$45,002.50 \$115.00 \$15,007.50 \$15,00	email to 8. Bien chain re 055 citations as support for Ch. Firet's open reproduction moderates any extreme organization and of motion for interest to fire undoor for certification of subclasses. review or grant and and directations of 15 miles control and support of motion for leave to the film ordinary or certification of subclasses. review and end to so directations of 15 miles consumer saviny in apport of motion for leave to film motion for certification of subclasses review and end to so directations of 15 miles proper of motion for leave the film motion for certification of subclasses review and end to so directations of 15 miles or certification of subclasses and the property is film and a film or certification of subclasses and the property is film and a film or film of the film or film
Brian Umpierre Bran Umpierre B	1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1018/70023	0.30 0.30 0.20 1.10 0.00 0.00 0.00 0.00 0.00 0.0	9025.00 9025.00	\$277.50 \$45,002.50 \$110.00 \$20	email to 8. Bites chain re 055 citations as support for Ch. Firest open reposition in discass from the way to be itemated for a confliction of subclasses review operated was did not citations as support for confliction or be subclasses, seen Firest-Victing very large disclasses and categories are supported to the subclasses and the Pices of the subclasses are review and delta to districtionated or disclasses and the property of the subclasses and the property of the subclasses are review and delta to disclasses and of the subclasses are review and delta to disclasses and the disclasses are review and delta to disclasses and the disclasses are review and delta to disclasses and the subclasses are review and delta to disclasses are review and delta disclasses are review and the disclasses and review and the disclasses are disclasses and review and the disclasses are disclasses are review and the disclasses are disclasses are review and the disclasses are disclasses and review and the disclasses are disclasses and review and the disclasses are related to a review and the disclasses are revie
Brian Umpierre Bran Umpierre	1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1018/7023 118/7023	0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.30	9925.00 9925.00	\$277.50 \$4.802.50 \$110.70 \$10.	email to 8. Billers chain re DSS citations as support for Dr. Firetire oper-topinose in declaration supporting motion for leven to the motion for certification of valuebases. review operative during of motion for leven the form color for certification of subclassases, sent Firetires (Ching vary Intervallence of subclassases) review and end to so districtions of motion for certification of subclassases. review and end to so districtions of subclassases and support of motion for leve to the motion for certification of subclassases. phone call with capter 15 Relat and P. Kennedy, O. Wallace, N. Unitrose, T. Claras, L. Pettlers rel certification of subclassases and certification of subclassases. phone call with capter 15 Relat and P. Kennedy, O. Wallace, N. Unitrose, T. Claras, L. Pettlers rel cert thesis and formedly declarations support motion for certification of subclassases, review ways the district of certification of subclassases, cuttoms, floating field, Bloson, Jones support motion for certification of subclassases, cuttoms, floating floating, and the subclassases and certification of subclassases, cuttoms, floating floating, and the subclassases and received on the subclassases. Cuttoms floating floating,
Brian Umpierre Bran Umpierre B	1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1117/70023	0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.30	9925.00 9925.00	\$277.50 \$4,802.50 \$118.50 \$118.50 \$15,001 \$25,000 \$25,	email to 8. Bites chain re 055 citations as support for Ch. Firetri opertropinose in declaration payabring motion for lawn to file motion for rest the file motion for rest that for the motion for rest files and for restriction of valueties, cultimore, finally rest, scheme, feating files,
Brian Umpierre Bran Umpierre B	1017/70023 1117/70023 1117/70023	0.30 0.30 0.30 0.20 1.10 0.00 0.00 0.00 0.00 0.00 0.0	9025.00 9025.00	\$277.50 \$45,002.50 \$115.00 \$15,007.50 \$15,00	email to 8. Billen chain re 055 citations as support for Ch. Firetire operations in declaration projecting motion for leave to file motion for result can be received and early out discussation of the control many and project of motion for leave to file motion for certification of subclasses reviews and edits to discussations of the control many and project of motion for leave the file motion for certification of subclasses reviews and edits to discussations and of the control many and the project of motion for leave the file motion for certification of subclasses and the projects for leave the file motion for certification of subclasses, provided and the projects for leave the file motion for results for motion for such that motion for motion for leave the file motion for results for motions, cultimore, finally motion for leave to file motion for results for motions, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for certification of subclasses, cultimore, finally motion for leave the file motion for subclasses and result of the file motion for certification of subclasses and provided to motion for subclasses and result of the file motion for subclasses and result of the file motion for subclasses and result of s
Brian Umpierre Bran Umpierre B	1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1017/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 1007/70023 11/70023	0.30 0.30 0.30 0.30 0.30 0.30 0.40 0.40	9925.00 99225.00	\$277.50 \$45,002.50 \$110.00 \$110.00 \$1	email to 8. Bies chain ve DSS citations as support for Dr. Firet's open opinion in declaration supporting motion for lawn to the motion for certification of subdiscasses review operative during of motions for lawn to the motion for certification of subdiscasses review operations and of motions for lawn to the consistency of the control of the contro
Brian Umpierre Bran Umpierre B	1017/70023 11/70023 11/70023	0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.30	9925.00 9925.00	\$277.50 \$4,802.50 \$118.50 \$118.50 \$15,071.50	email to 8. Billen chain re DSS citations as support for Dr. Firet's open reportance in declaration supporting motion for leven to the motion for certification of valuebases. **Review operative during of motion for incent to firet control processing and the processing of the control procesing of the control processing of the control processing of the co
Brian Umpierre Bran Umpierre B	1017/70023 1117/70023 1117/70023	0.30 0.30 0.30 0.20 1.10 0.00 0.00 0.00 0.00 0.00 0.0	9925.00 9925.00	\$277.50 \$4,802.50 \$115.00 \$115.00 \$25	email to 8. Billen chain re 055 citations as support for Ch. Firet's open reposition in discastion supporting motion for leave to the motion for certification of valuebases. review operative dark of motion for insteal to the immotion for certification of subclassases. review and end to so discharacterisation of Section and declaration in support of motion for leave to the immotion for certification of subclassases review and end to so discharacterisation of Section (Control of Section 1) and the subclassases and the property of the subclassases and the property of the subclassases and the property of the subclassases and subclassa
Brian Umpierre Bran Umpierre B	1017/70023 11/70023 11/70023	0.30 0.30 0.30 0.30 0.30 0.30 0.40 0.40	9925.00 9925.00	\$277.50 \$48,002.50 \$110.00 \$21,002.50 \$10.00 \$21,003.50 \$21,003.50 \$20,003 \$20	email to 8. Elen-Cahn vo 255 citations as support for Ch. First open opinion in decaration supporting motion for leave to file motion for trace the file motion for including the motion for certification of substances. **Review operation during discussation of the decisionation is support of motion for leave to file motion for certification of substances. **Review and set that of a discussation of the decisionation is support of motion for leave to file motion for certification of substances. **Review and set that of a discussation in 250 decisionation is support of motion for leave the file motion for certification of substances. **Provided on the control of the support of the support of motion for substances. **Provided on the control of the substance is support motion for such certification of substances. **Provided on the control of the substance is substance. **Provided on the control of the subst
Brian Umpierre Bran Umpierre B	1017/70023 1117/70023 1117/70023	0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.30	9925.00 9925.00	\$277.50 \$4,802.50 \$110.70 \$110.70 \$10	email to 8. Biles chain re 055 citations as support for Ch. Firest opert opinions in declaration supporting motion for leave to file motion for include the form oblore of certification of substaces, seen Firest-Operationary includes and the certification of substaces and to P. Kennedy in status cheen on dath declaration in support of motion for leave to file motion for certification of studies. The certification of substaces are considered to the certification of substaces and the certification of substaces and the certification of substaces and certification of substaces, certification of subst
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Brian Umpierre Bran Umpierre B	1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1017/7023 1018/7023 1018/7023 1018/7023 1018/7023 1018/7023 1018/7023 1018/7023 1007/7023 1007/7023 1007/7023 1007/7023 1007/7023 1007/7023 1007/7023 11/7023	0.30 0.30 0.30 0.30 0.30 0.30 0.30 0.30	9925.00 9925.00	\$277.50 \$4,802.50 \$110.70 \$10.	email to 8. Biles chain ve 855 citations as support for Ch. Firest opert opinions in declaration supporting motion for leave to file motion for travel to file motion for certification of substaces, seen Firest-George Vincesting and the control of
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Brian Umpierre	1/17/2024	0.30	\$925.00	\$277.50	review correspondence re supplemental discovery responses and tasks
Brian Umpierre Brian Umpierre	1/24/2024 1/26/2024	0.50 0.50	\$925.00 \$925.00	\$462.50 \$462.50	phone call with G. Wallace re assessment and related data necessary for statifing analysis data in hand; email to J. Thornton and D. Marks requesting meeting re same Zoom with MJ. Johnson, G. Wallace, and J. Thornton re staffing analysis data on hand
Kathryn Stebner Brian Umpierre	1/30/2024 1/30/2024	0.30 6.80	\$1,300.00 \$925.00	\$390.00 \$6,290.00	discussion with 8. Umpiere re subclasses certification hearing and preparation for same draft discovery letter brief and supporting declaration re production of missing assessment and other staffing-related data; emails with M. Johnson re same
Brian Umpierre	1/30/2024	1.50	\$925.00	\$1,387.50	moot session by Zoom in preparation for subclasses certification hearing
Kathryn Stebner Brian Umpierre	1/31/2024 1/31/2024	0.20 3.40	\$1,300.00 \$925.00	\$260.00 \$3,145.00	email correspondence with 8. Umpierre re staffing-related data; sufficiency 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 Umpierre Brian Umpierre	1/31/2024 2/1/2024	0.30	\$925.00 \$925.00	\$277.50 \$2,775.00	email correspondence with G. Wallace re number of disabled residents per facility re numerosity analysis attend bearing on motion for leave to file motion for subclassers and to strike attorney declaration. ND Cal. Caldand
Kathryn Stebner	2/2/2024	0.40	\$1,300.00	\$520.00	attend nearing on motion for leave to file motion for subclasses and to strike attorney declaration - NO Lat, Casisand meet with B. Umplerre re results of hearing on motion for leave to file motion for subclasses and to strike attorney declarations
Brian Umpierre Brian Umpierre	2/2/2024 2/2/2024	0.70	\$925.00 \$925.00	\$647.50 \$370.00	Team strategy meeting re-outstanding and potential further motions to compel Meeting with K. Stebner re-results of hearing on motion for leave to file motion for subclasses and to strike attorney declarations
Brian Umpierre	2/2/2024 2/7/2024	1.00	\$925.00	\$925.00 \$520.00	Meeting with M. Johnson and J. Thomton re missing data needed for staffing analysis, benchmark formula
Kathryn Stebner Brian Umpierre	2/7/2024	0.40 4.00	\$1,300.00 \$925.00	\$3,700.00	Phone call with B. Umpierre re plan for renewing motion for certification of subclasses, scope of case/claims Call with M. Johnson re benchmark staffing formula motion to compel/letter brief and edits re same
Brian Umpierre Brian Umpierre	2/7/2024 2/8/2024	0.40	\$925.00 \$925.00	\$370.00 \$277.50	Phone call with K. Stebner re plan for renewing motion for certification of subclasses, scope of case/claims Email correspondence with Dr. Kennedy re status of class certification and resubmission of Kennedy declaration in support of same
Brian Umpierre	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 Umpierre Brian Umpierre	2/8/2024 2/8/2024	0.20	\$925.00 \$925.00	\$185.00 \$370.00	Forward revised draft of Plaintiffs' expert Kennedy subclasses declaration to Dr. Kennedy for review Phone call with M. Johnson re Plaintiffs expert Schroyer's materials and analysis, as regards discovery motion for staffing formula
Brian Umpierre Brian Umpierre	2/9/2024 2/9/2024	0.20	\$925.00 \$925.00	\$185.00 \$92.50	Email correspondence with 1. Yellin re Plaintiffs' expert Kennedy's subclasses declaration Email proposed/draft claim form to Dr. Kennedy
Brian Umpierre	2/9/2024	0.90	\$925.00	\$832.50	Emails and phone calls and Zoom with G. Wallace on Kennedy subclasses declaration; bring to final
Kathryn Stebner Brian Umpierre	2/26/2024 2/26/2024	0.50 0.60	\$1,300.00 \$925.00	\$650.00 \$555.00	Discuss staffing analysis results with 8. Umplerre in connection with motion for subclasses and plan for moving to compel additional data Zoom among G. Wallace, M. Johnson, D. Marks, and J. Thornton re staffing analysis
Brian Umpierre Kathryn Stebner	3/1/2024 3/9/2024	1.50 0.20	\$925.00 \$1,300.00	\$1,387.50 \$260.00	Draft email/letter to delense addressing Brookdate's failure to produce remaining assessment data; circulate to team for review and comment Discuss with B. Umpierre demented witness testimony considerations
Brian Umpierre	3/9/2024	0.40	\$925.00	\$370.00	Emails among team regarding ability/competency of witness with dementia diagnosis to testify
Brian Umpierre Brian Umpierre	3/15/2024 3/19/2024	0.30 2.20	\$925.00 \$925.00	\$277.50 \$2,035.00	Phone call with G. Wallace re meet and confer letter proposing compromise position on production of assessment/staffing data Draft letter to counsel proposing approach to deal with assessment data issues; foewed to G. Wallace, M. Johnson for comment
Brian Umpierre Brian Umpierre	3/19/2024 3/20/2024	0.10	\$925.00 \$925.00	\$92.50 \$277.50	Finalize assessment data proposal letter and send to defense Review Defendants' motion for sanctions for unnoticed "inspection"; email to M. Johnson re same
Brian Umpierre	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 Umpierre Brian Umpierre	3/23/2024 3/23/2024	0.80	\$925.00 \$925.00	\$740.00 \$370.00	Email to G. Wallace re high-level thoughts on substance of Flores Rule 26 expert report Email to GW re Flores Rule 26 expert report / contents.
Kathryn Stebner Brian Umpierre	3/24/2024 3/25/2024	0.30	\$1,300.00 \$925.00	\$390.00 \$277.50	Review B. Limpierre memo high-level thoughts on staffing expert Rule 26 report contents Email to G. Wallace, J. Thronton, D. Marks, M. Johnson re coordinating on staffing related expert reports and scheduling call re same
Brian Umpierre	4/2/2024	0.40	\$925.00	\$370.00	Phone call with J. Thornton re Flores Rule 26 expert report contents and materials needed for review
Brian Umpierre Brian Umpierre	4/2/2024 4/4/2024	0.20	\$925.00 \$925.00	\$185.00 \$370.00	Emails with G. Wallace re Flores Rule 26 report and compilation of same Email to R. Steyer re compiling materials for Dr. Flores to review in connection with her Rule 26 expert report
Brian Umpierre Brian Umpierre	4/4/2024 4/5/2024	0.30	\$925.00 \$925.00	\$277.50 \$277.50	Emails with G. Wallace and R. Steyer re materials needed for review regarding Flores Rule 26 report Email correspondence with G. Wallace and M. Johnson re newly produced contract labor data
Brian Umpierre	4/5/2024	2.50	\$925.00	\$2,312.50	Conference call with M. Johnson, G. Wallace, J. Thornon re contract labor data
Brian Umpierre Brian Umpierre	4/5/2024 4/5/2024	0.50 1.30	\$925.00 \$925.00	\$462.50 \$1.202.50	Emails and phone call with J. Thornton re time periods for staffing analysis, by facility Emails and phone calls with M. Johnson and J. Thornton re accounting for contract labor in staffing analysis
Brian Umpierre Brian Umpierre	4/5/2024 4/8/2024	1.50 5.50	\$925.00 \$925.00	\$1,387.50 \$5,087.50	Zoom with J. Thorton, G. Wallace, and M. Johnson re record evidence of contract labor, LDRs
Brian Umpierre	4/8/2024	0.20	\$925.00	\$185.00	Draft outlines of Flores and Schroyer Rule 26 expert reports; forward same to J Thornton for review and comment Forward to J. Thornton materials compiled by R. Steyer re anecdotal evidence of long wait times / pendant responses, re Flores Rule 26 report
Kathryn Stebner Brian Umpierre	4/9/2024 4/9/2024	0.50 5.00	\$1,300.00 \$925.00	\$650.00 \$4,625.00	Review correspondence re contract labor data issue and impact on staffing analysis, status of staffing-related Rule 26 expert reports Outline of draft Jones Rule 26 expert report and draft report; forward same to J. Thornton for review and comment
Brian Umpierre	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 Umpierre Brian Umpierre	4/9/2024 4/9/2024	0.40 1.00	\$925.00 \$925.00	\$370.00 \$925.00	Phone calls with G. Wallace re Flores and Schroyer draft Rule 26 expert reports Phone calls with J. Thornton re Flores and Schroyer draft Rule 26 expert reports
Brian Umpierre Brian Umpierre	4/10/2024 4/15/2024	0.30 2.00	\$925.00 \$925.00	\$277.50 \$1,850.00	Forward Brookdale's "personal rights acknowledgment" form to G. Wallace Draft supplemental interrogatory response re damages/barriers for Plaintiff Schmidt
Brian Umpierre	4/15/2024	4.50	\$925.00	\$4,162.50	Email correspondence and telephone calls with G. Wallace and J. Thornton recontract labor productions and relevance to staffing analaysis connclusions; research re same
Brian Umpierre Brian Umpierre	4/15/2024 4/15/2024	5.00 5.00	\$925.00 \$925.00	\$4,625.00 \$4,625.00	Draft Schroye Rule 26 report; forward to J. Thornton for review and comment Further edits to Flores Rule 26 expert report; forward to J. Thornton for review and comment
Brian Umpierre Brian Umpierre	4/16/2024 4/17/2024	3.90 0.50	\$925.00 \$925.00	\$3,607.50 \$462.50	Further edits to staffing related expert reports and research re questions from G. Wallace related thereo Zoom with G. Wallace, P. Kennedy, L. Petitie re Kennedy Rule 26 expert report
Brian Umpierre	4/17/2024	6.00	\$925.00	\$5,550.00	Edits / citations to staffing-related expert reports; emails and phone calls with 1. Thornton re same
Brian Umpierre Brian Umpierre	4/18/2024 4/18/2024	1.50 0.50	\$925.00 \$925.00	\$1,387.50 \$462.50	Call with J. Thornton re Flores, Schroyer, Belson Rule 26 report drafts and pro hac vice application in ND Cal Call with G. Wallace re use of care logs and reference(s) in Flores' Rule 26 report re same and upcoming pretrial/trial tasks
Brian Umpierre Brian Umpierre	4/18/2024 4/18/2024	0.60 4.50	\$925.00 \$925.00	\$555.00 \$4,162.50	Legal research re caregiver training regulations/Title 22 and email to G. Wallace re same Further edits to Flores Rule 26 expert report
Brian Umpierre	4/18/2024	2.00	\$925.00	\$1,850.00	Review ADL documentation requirements, care logs/shift logs, re Flores rebuttal opinions on staffing
Kathryn Stebner Brian Umpierre	4/19/2024 4/19/2024	0.40	\$1,300.00 \$925.00	\$520.00 \$370.00	Meet with B. Umpierre re status of staffing expert Rule 26 reports, Title 22 caregiver training regulations, and ADL documentation requirements Meeting with K. Stebner re status of staffing expert Rule 26 reports, Title 22 caregiver training regulations, and ADL documentation requirements
Brian Umpierre	4/19/2024 4/19/2024	0.50	\$925.00 \$925.00	\$462.50 \$925.00	Zoom with P. Kennedy, L. Pettite, G. Wallace, and R. Steyer re Kennedy Rule 26 report Team zoom - status on discovery negotiations, depositions/schedule, and Plaintiffs' motion for summary judgment on fleet safety policy
Brian Umpierre Brian Umpierre	4/22/2024	0.30	\$925.00	\$277.50	Emails with B. Bien-Khan re Flores support for understaffing referenced in Rule 26 report and DSS citations
Brian Umpierre Brian Umpierre	4/22/2024 4/24/2024	0.40	\$925.00 \$925.00	\$370.00 \$462.50	Discussion with G. Wallace re Jones Rule 26 report contents Email correspondencewith B. Blen-Khan and J. Thornton re Flores Rule 26 report re DSS citations
Brian Umpierre Brian Umpierre	4/24/2024 4/26/2024	0.40 3.40	\$925.00 \$925.00	\$370.00 \$3.145.00	Review revised Jones Rule 26 report; emails and phone call with J. Thornton re same Compile list of all Plaintiffs' staffing expert materials and production dates for same re expert production/discovery cutoff
Brian Umpierre	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 theron and work with R. Bonner and J. Thornton on data appendices compilation
Brian Umpierre Brian Umpierre	4/29/2024 4/29/2024	0.60 1.70	\$925.00 \$925.00	\$555.00 \$1,572.50	Correspondence with R. Bonner re Ps' experts' data appendices Phone calls with G. Wallace and J. Thornton re Flores Rule 26 expert report and further edits to same based thereon
Brian Umpierre	4/29/2024	0.60	\$925.00	\$555.00	Correspondence with R. Bonner re data for staffing expert report appendices
Brian Umpierre Brian Umpierre	4/29/2024 4/29/2024	2.00 0.30	\$925.00 \$925.00	\$1,850.00 \$277.50	Email and telephone communications with G. Wallace and J. Thornton re Flores Rule 26 expert report and further edits to same Forward defense experts Saad and Allen expert reports to J. Thornton
Brian Umpierre Brian Umpierre	4/30/2024	0.70	\$925.00	\$647.50 \$5,550.00	Correspondence with H. Fisher (Schmidt conservator) re supplemental ROG response and verification and highlight pertinent paragraphs Draft staffing expert Rule 26 reports and data appendices; email and telephone communications with G. Wallace and J. Thornton and R. Bonner re same
	4/30/2024	6.00	\$925.00		
Brian Umpierre	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
Brian Umpierre Kathryn Stebner Brian Umpierre	4/30/2024 5/1/2024 5/1/2024	0.40 1.50 4.00	\$925.00 \$1,300.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00	Review and comments re draft Flores, Schroyer, and Kennedy Rule 26 expert reports Finalize and serve staffing experts' (Flores, Schroyer, Belson, Jones) Rule 26 reports; communications with JT. Thornton, G. Wallace, and M. Johnson re same
Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre	4/30/2024 5/1/2024 5/1/2024	0.40 1.50 4.00 0.80	\$925.00 \$1,300.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00	Review and comments re draft Flores, Schroyer, and Kennedy Rule 26 expert reports Finalize and serve staffing experts (Flores, Schroyer, Beston, Jones) Rule 26 reports, communications with JT. Thornton, G. Wallace, and M. Johnson re same Finalize and serve staffing experts (Flores, Schroyer, Beston, Jones) and Defendants Finalize and serve shared Schrodins Schrodins Schrodins (Flores) and Finalize and serve shared Schrodins Schrodins (Flores) and Finalize and and F
Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/3/2024 5/7/2024	0.40 1.50 4.00 0.80 1.00 0.70	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$647.50	Review and comments reduct flows, Schroyer, and Kennedy Mult 28 expert reports Finalize and some staffing experts (Finers, Schroyer, Belson, Nones) Radu 28 Ferparts, communications with IT. Thornton, G. Wollace, and M. Johnson re same Finalize and sever Plaintiff Schmidts Furfirm Spaplemental interruptory response on Defendants Finalize and sever Plaintiff Schmidts Spatie Spaplemental interruptory response on Defendants Finalize and sever Plaintiff Schmidts Spatie Sp
Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre Brian Umpierre	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/3/2024	0.40 1.50 4.00 0.80 1.00	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00	Review and comments in dual filess. Schroyer, and Kannedy files & Export report. Finalize and serve filesting export if filess. Schroyer, Betoon, Joseph (Saz Erports; communications with Jf. fibernton, G. Wallace, and M. Johnson re-same Finalize and serve Plasindt Schnifts Further Spaplemental interrugatory response on Defendants Farm zonn er document open orders, case schools, failed reposalizor, our desired to be summer to the summer of the school of the summer orders of school orders orders. As schools, failed preparation, and entire for summary judgment
Brian Umplerre Kathryn Stebner Brian Umplerre Kathryn Stebner	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/3/2024 5/7/2024 5/7/2024 5/7/2024 5/8/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$647.50 \$1,202.50 \$832.50 \$1,040.00	Review and comments in dual files Schooly, and Kannedy Mulk 28 export reports Finaliza and serve Hailing exports (Fines Z-kroye, Beloon, June) Bull 28 figurests, communications with JT. Thornton, G. Wallace, and M. Johnson re same Finaliza and serve Plasinist Schniefs Further Spaplemental Interrugatory response on Defendants Faram zonner descurey orders, cas schooling, Lind preparation, and ention for summany judgment Telephone call with J. Thombon, or defense expert Saad export report contract labor column, rebutful, and expert deposition schedule Telephone call with J. Homone, O. Willace, J. Almoson re defense expert sada deport report and contract labor rebutful Review defense expert Saad export report and notice is same Review defense expert Saad export report and notice is same
Brian Um pierre Kathryn Stebner Brian Um pierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Brian Umpierre Kathryn Stebner Brian Umpierre Kathryn Stebner Brian Umpierre Brian Umpierre	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/7/2024 5/7/2024 5/7/2024 5/8/2024 5/8/2024 5/8/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80 0.50	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$647.50 \$1,202.50 \$832.50 \$1,040.00 \$462.50 \$370.00	Review and comments in dual files, Schroye, and Kannedy Muk 28 expert reports Finaliza and serve Hailing expert (Files, 24 krywa, Beton), Level (34 EV Beyert Revort). Finaliza and serve Plaintiff Schrider's Further Supplemental Interrugatory response on Defendants Finaliza and serve Plaintiff Schrider's Further Supplemental Interrugatory response on Defendants False norm one discovery orders, case scholing, but also present post of the properties of the prop
Brian Umplerre Kathryn Stebner Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Kathryn Stebner Brian Umplerre	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/3/2024 5/7/2024 5/7/2024 5/7/2024 5/8/2024 5/8/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$647.50 \$1,202.50 \$832.50 \$1,040.00 \$462.50	Review and comments or dual Flores, Schroper, and Konnecky Blue 2 export reports Finalize and one relified poetry (Flores, Schroper, and Konnecky Blue). Even Export reports Finalize and some Planting Schmidter Further Supplemental Interruptory response on Defendants Finalize and some Planting Schmidter Further Supplemental Interruptory response on Defendants Finalize and some Planting Schmidter Further Supplemental Interruptory response on Defendants Finalized Control of Planting Schmidter Further Schmidter Sch
Brian Umplerre Kathryn Stebner Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Kathryn Stebner Kathryn Stebner Kathryn Stebner	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80 0.50 0.40 1.00	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$647.50 \$1,202.50 \$482.50 \$370.00 \$925.00 \$1,950.00 \$370.00	Review and comments in dual filters, Schroper, and Kannendy Mile Sile opent reports Finalizar and serve filterili opentry (Fines, Schroper, and Kannendy Mile Sile opents (sports) Finalizar and serve filterili opentry (Fines, Schroper, Bedon, Jones, Bild Sile properts, communications with Jr. Thermton, G. Wallace, and M. Johnson re same Finalizar and serve filtrandis Schroder Supplemental Interruptory response on Defendants Finalizar and serve filtrandis Schroder (Schroder) Finalizar (Sch
Brian Umpierre Kathryn Stebner Brian Umpierre	4/30/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024 5/1/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80 0.50 0.40 1.00 1.50 0.40 2.50	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,990.00 \$3,700.00 \$740.00 \$925.00 \$447.50 \$1,202.50 \$832.50 \$1,040.00 \$462.50 \$370.00 \$925.00 \$1,980.00 \$2,370.00 \$2,370.00 \$2,370.00 \$2,370.00	Review and comments in dual files, Schrope, and Kannedy Miles Se expert epoint. Finalizar and serve Hailing openty (Files, Schrope, Bedon, Junes) (Bull 28 reports, communications with Jf. Thereton, G. Wallace, and M. Johnson re same Finalizar and serve Plasint Schmidts' Further Supplemental Interrugatory response on Defendants Faran zonner de Scorey orders, case scholing, but als reparation, or antiento for summany jurigiment. Telephone call with J. Thombins or defense sepert Saad eport report, contract labor claim, rebutst, and expert deposition schedule Telephone call with J. Thombins, C. Willace, A. Volusions re defense sepert Saad eport report and contract Labor rebutst Review defines eport Saad report report and contract Labor rebutst. Review and E. Disperse in dazus Defendance Strating-resisted eport reports. Review and Comment in Alloward or description of the Saad report report and contract tabor rebutst. Review and Comment in Alloward or Saad reformation of the Saad report
Brian Umplerre Kathryn Slebner Brian Umplerre Kathryn Slebner Brian Umplerre Kathryn Slebner Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre Brian Umplerre	410/2024 511/2024 511/2024 511/2024 511/2024 517/2024 517/2024 517/2024 518/2024 518/2024 518/2024 518/2024 518/2024 518/2024 518/2024 518/2024 518/2024	0.40 1.50 0.80 1.00 0.70 1.30 0.50 0.40 1.00 1.50	\$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$1,300.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00	\$370.00 \$1,950.00 \$740.00 \$275.00 \$647.50 \$1,202.50 \$822.50 \$1,040.00 \$462.50 \$370.00 \$925.00 \$1,950.00 \$1,950.00 \$2,312.50	Review and comments or dust Flores, Schroper, and Konnecky Blue S expert reports Finalize and one relified property Flores, Schroper, and Konnecky Blue S reports communications with Jr. Thornton, G. Wallace, and M. Johnson ne same Finalize and serve Planind Schmidts Further Supplemental Interrugatory response on Detendants Team zonner discovery orders, case schedule, vial represention, and entire to be senting schedule Team zonner discovery orders, case schedule Team planes or and the Schroper orders, case schedule Team planes call with J. Thornton, G. Wallace, M. Johnson or defense expert Saud expert report and contract labor rebutts Review of these expert Saud expert report and ontolers exame Meet with S. Unrepiers to discover Defendants' staffing existence operate reports Review and comments or 1. Thornton or defense expert Saud reports or operate source of the Saud Schroper or operated source of the Saud Schroper orders or operated by the Saud Schroper orders orders or operated source or
Brand Umpleter Kathyn Sebener Brand Umpletere Brand Umpletere	4/10/2024 5/11/2024 5/11/2024 5/11/2024 5/17/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80 0.50 0.40 1.00 2.50 0.40 2.50 0.30 1.00	\$925.00 \$1,300.00 \$925	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$447.50 \$1,202.50 \$31,240.00 \$462.50 \$370.00 \$925.00 \$1,950.00 \$2,312.50 \$300.00 \$1,202.50 \$370.00 \$2,312.50 \$300.00 \$1,202.50 \$370.00 \$2,712.50 \$300.00 \$1,202.50	Review and comments to dust filters, Schroper, and Kannerly Miles 28 expert reports Finalizar and serve filtering operaty (Fires, Schroper, and Kannerly Miles). 262 reports, communications with Jr. Thereton, G. Wallace, and M. Johnson re-same Finalizar and serve Fluiding Schmidts Supplemental Interrugatory response on Defendants Tears zonn en Schwerey orders, case schedule, but appreadure, on an elevation for summany jurgiment Telephone call with J. Thereton in reference expert Said expert report. Continuct lainer claims, rebuts, and expert report and continuct lainer claims and the schwarz of the s
Brand Umpletre Kathryn Stebher Brian Umpletre	43070024 511,00024 511,00024 511,00024 517,00024 517,00024 517,00024 517,00024 517,00024 518,000	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.50 0.40 1.00 1.50 0.40 2.50 0.30 1.00 1.30 0.30 0.30 0.30 0.30	\$925.00 \$925.0	\$370.00 \$1,950.00 \$3,700.00 \$740.00 \$925.00 \$447.50 \$1,202.50 \$832.50 \$1,202.50 \$462.50 \$370.00 \$2,370.00 \$2,312.50 \$370.00 \$2,312.50 \$370.00 \$2,312.50 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00	Review and comments to dust filescope, and Kannendy Blue Sile spent reports Finalizar and serve Bridge operty (Filesco, Schrope, and Kannendy Blue Sile spent reports Finalizar and serve Brained Schmidt's Further Supplemental Interrugatory response on Detendants Finalizar and serve Brained Schmidt's Further Supplemental Interrugatory response on Detendants Filescoper call with J. Bromber in effective spent Saud expent report control tables claims, rebutst, and expert deported deported on schedule Filescoper call with J. Bromber in Medicare Schmidt Section (Saud Section Schmidt Section
Brand Umpleter Kathnyn Stebener Brand Umpletere Brand Umpletere	43070024 5112004 5112004 5112004 5112004 5112004 51170004	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.90 0.80 0.50 0.40 1.00 1.50 0.40 2.50 0.30 1.00	\$925.00 \$1,300.00 \$925.00	\$3.70.00 \$1.980.00 \$7.40.00 \$27.40.00 \$27.50.00 \$12.50.00 \$12.50.00 \$12.20.00 \$12.20.00 \$12.20.00 \$2.370.00 \$2.370.00 \$2.370.00 \$2.370.00 \$1.200.50 \$370.00 \$2.370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$400.00	Review and comments or dual files, Schroper, and Kannerly Mills 28 expert sports Finalize and serve fileding expert (Files, 2-forey, Bedon, Jones) filed 28 reports, communications with Jr. Thereton, G. Wallace, and M. Johnson re-same Finalize and serve Fluiding Schmidt's Further Supplemental Interregiony response on Defendants Fanan zonner descury orders, case scholing, but gregaration, and entire fileding filedin
Brand Umpleter Earlan Umpleter Brand	43070024 5112024 5112024 5112024 5112024 5172024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.50 0.40 1.50 0.40 1.50 0.40 1.50 0.40 1.50 0.40 0.50 0.50 0.50 0.50 0.50 0.50 0	\$925.00 \$1,200.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$1,200.00	\$3770.00 \$3,700.00 \$3,700.00 \$740.00 \$925.00 \$447.50 \$1,202.50 \$322.50 \$10,40.00 \$462.50 \$3770.00 \$2,712.50 \$395.00 \$1,300.00	Review and comments or durit from Company, and Komenoly fluid 28 expert reports Finalizar and one relified poetry (Fines, Scriege, March, Joseph (242 Feports; communications with Jr. Thorston, G. Wallace, and M. Johnson ne same Finalizar and serve Planniel Schmidts Further Supplemental Interrugatory response on Detendants Faran zonne re Scriege opportung order, seat schedule, vial representation, and control to summany significant for the seat of
Brand Umpleter Lathryn Bebener Brand Umpleter Brand Umpleter	43070024 517,0004 517,0004 517,0004 517,0004 517,0004 517,0004 517,0004 517,0004 517,0004 518	0.40 1.50 4.00 0.80 1.00 0.77 1.30 0.80 0.80 0.50 0.40 1.00 1.30 0.80 0.40 0.30 0.40 0.80 0.40 0.80 0.40 0.80 0.40 0.80 0.8	9925.00 \$13,000.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9275.00 \$9255.00	\$370.00 \$3,700.00 \$3,700.00 \$370.00 \$370.00 \$370.00 \$367.50 \$3,202.50 \$3,000.00 \$3,000.00 \$3,202.50 \$3,000.00 \$3,000.00 \$3,000.00 \$3,000.00 \$3,000.00 \$3,000.00 \$3,000.00 \$4,000	Review and comments to dust filters, Schroper, and Kannerly Miles 28 expert reports Finishize and serve filtering expert (Filters, Schroper, and Kannerly Miles). 28 expert reports Finishize and serve filtering expert (Filters, Schroper, alleon, Johns (Sale Zierpents, communications with Jr. Thereton, G. Wallace, and M. Johnson re same Finishize and serve filtering expert filters. 24 Expert in the Communication of the Communic
Brand Umpletere Land Umpletere Brand Langerere	43070024 5112004 5112004 5112004 5112004 512004	0.40 1.50 4.00 0.50 0.50 0.70 1.30 0.50 0.50 0.40 1.50 0.40 1.50 0.40 1.50 0.40 1.50 0.40 0.50 0.50 0.40 0.50 0.50 0.40 0.50 0.5	\$925.00 \$12,000.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$925.00 \$12,000.00 \$925.00	\$370.00 \$1,950.00 \$170.00 \$170.00 \$170.00 \$170.00 \$170.00 \$1,000	Review and comments to dutal fivors, Schroper, and Kannendy Milus 28 expert reports Finalizar and serve filted reports (Finalizar and serve filted poetry). Effects, Schroper, Bendon, Jones (Julia 29 reports, communications with Jr. Thorston, G. Wallace, and M. Johnson re-same Finalizar and serve Fluidint Schmidt's Further Supplemental Interrugatory response on Defendants Team zonn et Schroper orders. case scholize in September (Julia 19 reportation), and despert of programs (Finalizar and September 20 reports). Thorston, G. Wallace, A. Holmson te feltense expert saud expert sport contains labor claims, rebuts, and expert deport deposition schedule Telephone call with J. Thorston, G. Wallace, A. Holmson te feltense expert saud expert reports and contact labor rebuts in Medical Will. L. Thorston, G. Wallace, A. Holmson te feltense expert saud expert reports Review and comments or I. Thorston, and the second contact basiner (Seath and Seath Anne Seath and Seath and Seath and Seath and Seath and Seath and
Brand Umpleter Lathnyn Bebene Brian Umpleter	43070024 511,0004 511,0004 511,0004 517	0.40 1.50 4.00 0.80 1.00 0.80 0.80 0.80 0.80 0.40 1.00 0.80 0.40 0.40 0.80 0.80 0.40 0.80 0.8	\$925.00 \$925.00	\$370.00 \$3,700.00 \$3,700.00 \$270.00 \$270.00 \$270.00 \$270.00 \$3,700	Review and comments or during Forces, Schroper, and Komenoly Blue 28 expert reports Finalizar and one realizing operary (Fines, Schroper, and Komenoly Blue 28 expert reports Finalizar and one Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finalizar and one Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finalizar and one Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finalizar and Commental Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finalizar and Fi
Brand Umpletre Lathryn Stebener Bland Umpletre Bland Umpletre Brand Umpletre Bran	43070024 51170024 51170024 51170024 51170024 51170024 51770024 51770024 51770024 51770024 51770024 51770024 5170024	0.40 1.50 4.00 0.80 1.00 0.70 1.30 0.80 0.80 0.80 0.40 1.00 0.40 1.00 0.40 1.10 0.40 1.10 0.40 0.50 0.40 0.50 0.40 0.50 0.40 0.50 0.40 0.50 0.5	\$925.00 \$925.00	\$370.00 \$1,950.00 \$170.00 \$12,00 \$12,00 \$12,00 \$12,00 \$12,00 \$12,00 \$12,00 \$12,00 \$12,00 \$13,00 \$10,	Review and comments or durit filters, Schrönger, and Komenoly films 28 expert reports Finishize and serve Plasting Schmidter's Further Supplemental Interrugatory response on Detendants Finishize and serve Plasting Schmidter's Further Supplemental Interrugatory response on Detendants Finishize and serve Plasting Schmidter's Further Supplemental Interrugatory response on Detendants Finishize and serve Plasting Schmidter's Further Supplemental Interrugatory response on Detendants Finishize Commental Interview Commental Inte
Brand Umpleter Edition Debender Brand Umpleter	43070024 51170024	0.46 1.50 4.00 0.80 1.00 0.70 1.30 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$925.00 \$925.0	\$370.00 \$1,950.00 \$1,700.00 \$1740.00 \$120.50 \$120.50 \$120.50 \$120.50 \$120.50 \$120.50 \$120.50 \$1370.00 \$1070.00	Review and comments or durif from, Schroper, and Kennerly Mills 28 reports reports Finishize and serve Flaintife Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Flaintife Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Flaintife Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Flaintife Schmidt's Further Supplemental Interrugatory response on Defendants Flaintife Commental Interrugatory or Schmidt Schmidt's Further Supplemental Interrugatory response on Defendants Flaintife Commental Interrugatory of Schmidt's Flaintife Schmidt S
Brand Umpleter Land by Bebene Brand Langiere Brand	43070024 5112024	0.40 1.50 4.00 0.80 1.00 0.70 0.70 0.80 0.80 0.80 0.80 0.80 0	\$925.00 \$925.00	\$370.00 \$3,700.00 \$3,700.00 \$170.00 \$120.00 \$120.00 \$120.00 \$120.00 \$13,000 \$1	Review and comments or dual Flores, Schroper, and Kennecky Blue 2 Report reports Finaliza and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finaliza and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finaliza and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finaliza and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finalizatory of the Schmidts' Further Supplemental Interrugatory response on Defendants Finalizatory of the Schmidts' Further Supplemental Interrugatory response on Defendants Finalizatory of the Schmidts' Further Sch
Brand Umpletere Karlo Umpletere Brand Umpletere	4:30/2024 5:11/2024	0.40 1.50 4.00 0.80 1.00 0.70 1.00 0.50 0.50 0.50 0.50 0.50 0.50 0.5	\$925.00 \$925.00	\$370.00 \$1,950.00 \$370.00 \$1,900.00 \$1,000.00	Review and comments or during Fourty Flores, Schroper, and Konnecky Black September (2014). The Finalizar and one serving deposition of processing and server Planning Schmidts's Further Supplemental Interrugatory response on Detendants Finalizar and serve Planning Schmidts's Further Supplemental Interrugatory response on Detendants Flores and server Planning Schmidts's Further Supplemental Interrugatory response on Detendants Flores and Schmidts's Further Supplemental Interrugatory response on Detendants Flores and Schmidts's Further Supplemental Interrugatory response on Detendants Flores and Schmidts's Further Schmidts's Further Supplemental Interrugatory Further Schmidts's Further Schm
Bana Umpierre Kathryn Bebere Bisa Umpierre	43070024 51170024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$925.00 \$925.0	\$370.00 \$1,000.00 \$17,00.00 \$17,00.00 \$17,00.00 \$17,00.00 \$12,00.00 \$12,00.00 \$12,00.00 \$12,00.00 \$12,00.00 \$12,00.00 \$12,00.00 \$13,00.0	Review and comments or during Fourty Filters, Schroper, and Komenoly Blue 28 expert reports Finalizar and serve Plasmid Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and serve Plasmid Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and serve Plasmid Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and serve Plasmid Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and Schmidts Further Supplemental Interrugatory response on Detendants Finalizar All Schmidts Further Supplemental Interrugatory Review Further Schmidts
Brand Umpleter Edita Umpleter Brand	43070024 511,0004	0.40 1.50 4.00 0.80 0.80 1.00 0.90 0.90 0.90 0.90 0.90 0.90 0.9	9975.00 9875.00	\$370.00 \$1,900.00 \$170.00 \$120	Review and comments or dual fricos, Schroper, and Kennerly fluid 28 equent report Finishiz and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishiz and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishiz and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishizatory orders, case schedule, and greatering and interrugatory response on Defendants Finishizatory orders, and schedule Finishizato
Brand Umpletere Karloyn Bebeher Brian Umpletere Brian Umpleter	43070024 51120024 51120024 51120024 51120024 51120024 51120024 51120024 51720024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$923.00	\$370.00 \$1,950.00 \$370.00 \$1,950.00	Review and comments or during Fourty Flores, Schroper, and Konnecky Black Separate reports Finalizar and one realizing deposity Flores, Schroper, and Konnecky Black Separate (Separate Planting Schmidts) Further Supplemental Interrugatory response on Detendants Finalizar and one Planting Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and one provided of the Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and Schmidts Further Supplemental Interrugatory response on Detendants Finalizar and Further Schmidts Further Supplemental Interrugatory Review (Separate Planting Schmidts) Finalizar II. I Interrugatory of the Schmidts Further Schmidts Further Schmidts Further Schmidts Finalizar II. I Interrugatory of the Schmidts operation of the Schmidts Further Schmidts Further Schmidts Finalizar II. Interrugatory of the Schmidts Further Schmidts Further Schmidts Finalizar II. Interrugatory of the Schmidts Further Schmidts Further Schmidts Finalizar II. Interrugatory of the Schmidts Further Schmidts Finalizar III. Interrugatory of the Schmidts Finalizaria III. Interrugatory of t
Bana Umpierre Kathyn Bebere Bida Umpierre Bi	4:30/2024 5:17/2024	0.40 1.50 4.00 0.80 1.00 0.80 0.90 0.90 0.90 0.90 0.90 0.90 0	\$922.00 \$922.00	\$370.00 \$1,900.00 \$170.00 \$170.00 \$140.00 \$140.00 \$140.00 \$140.00 \$140.00 \$1,000.00 \$1	Review and comments or dual fricon, Schroper, and Kannerly Miles 28 expert sports Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and Schmidts Further Supplemental Interrugatory response on Detendants Finishize All Plasines Further Schmidts Further Supplemental Interrugatory Review (Schmidts Further Supplemental Interrugatory Review (Schmidts Further Schmidts Further Schm
Brand Umpletere Land Umpletere Brand Langerere	43070024 51170024	0.40 1.50 4.00 0.80 0.80 0.80 0.80 0.80 0.80 0.8	\$925.00 \$925.00	\$370.00 \$3,700.00 \$3,700.00 \$740.00 \$22,00 \$22,00 \$22,00 \$22,00 \$22,00 \$22,00 \$23,00	Review and comments or during Flores, Schroper, and Komenoly Blue 20 expert reports Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and serve Plasined Schmidts Further Supplemental Interrugatory response on Detendants Finishize and Schmidts Further Supplemental Interrugatory response on Detendants Finishize All Plasines Further Schmidts Further Supplemental Interrugatory Review Plasines Further Schmidts Further Schm
Bana Umpierre Kathyn Bebere Bidan Umpierre Bidan Um	43070024 5112024	0.40 1.50 4.00 0.80 0.80 0.80 0.80 0.80 0.80 0.8	\$925.00 \$925.0	\$370.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$25,800.00 \$25,800.00 \$25,800.00 \$25,800.00 \$25,800.00 \$3,	Review and comments or during Fourty Flores, Schroper, and Kennerly Flue See opent reports Finalizar and one realized geometric Flores, Schroper, and Kennerly Flue See open reports Finalizar and one realized geometric Flores See open seed in the property of the property
Brand Umpleter Edition Debender Bland Umpleter Blan	4:30/2024 5:17/2024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$1,950.00 \$170.00 \$1,000.00	Review and comments or during forces, Schroper, and Kennerly Fluid 24 opents report Finalizar and one religite opents (Finalizar, Schroper, Beston, Joseph (242) Reports (communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalizar and one Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finalizar and one provision of the Communication of t
Bana Umpierre Karloy Miseber Bida Umpierre B	43070024 51170024 51170024 51170024 51170024 51170024 5170024	0.40 1.50 4.00 0.80 0.80 1.00 0.80 0.80 0.80 0.80 0	\$922.00 \$12,000,00 \$222.00	\$370.00 \$1,000.00 \$740.00 \$270.00 \$270.00 \$270.00 \$12.00 \$10.00 \$	Review and comments or dual Flores, Schroper, and Kennerly Flue 2 report report Finalizar and one relifier georety (Flores, Schroper, Bedon, Jones) Flue 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalizar and care Plantiff Schmidtr Further Expipelmental Interrugatory response to Defendant Flores and care Plantiff Schmidtr Further Expipelmental Interrugatory response to Defendant Flores and care Plantiff Schmidtr Further Expipelmental Interrugatory response to Defendant Flores and Care Schmidtr Further Expipelmental Interrugatory response to Defendant Flores and Care Schmidtr Further Expipelmental Interrugatory response to Defendant Flores and Schmidtr Further Expipelmental Interrugatory Flores and Expipelmental Interrugatory Flores and Expipelmental Interrugatory Flores and Care Schmidter Schmidtr Flores and Care Schmidter Schmidtr Flores and Care Schmidter Interrugatory Flores Inter
Brand Umpletere Land Umpletere Brand Langierere Brand Lan	43070024 51170024	0.40 1.50 4.00 0.80 0.80 1.00 0.80 0.80 0.80 0.80 0	907.5 00 \$027.5 00 \$	\$370.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$470.00 \$22,00 \$42,00 \$42,00 \$42,00 \$440.20 \$4	Review and comments or dual fricos, Schroper, and Kennerly Blue 2 expert report Finishize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory Further Schmidts' Furth
Brand Umplerer Edition Debender Brand Umplerer Bran	4:30/2024 5:17/2024 6:17/2024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$3,70.00 \$3,70.00 \$3,70.00 \$4,7	Review and comments or due filt cover, and comments of the Review, and the Review of t
Bana Umpierre Brian Umpierre	43070024 51170024	0.46 1.50 4.00 0.80 0.80 0.80 0.80 0.80 0.80 0.8	\$925.00 \$925.00	\$370.00 \$3,700.00 \$3,700.00 \$740.00 \$22,00 \$22,00 \$402.50	Review and comments or dual Flores, Schroper, and Kennerly Flue 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and some Plantiffe Schmidth's Further Supplemental Interrugatory response on Defendants Finalize and some Plantiff Schmidth's Further Supplemental Interrugatory response on Defendants Finalize and some Plantiff Schmidth's Further Supplemental Interrugatory response on Defendants Finalize and Schmidth's Further Supplemental Interrugatory response on Defendants Finalize and Schmidth's Further Supplemental Interrugatory response on Defendants Finalized Comments of the Schmidth's Further Supplemental Interrugatory Response on Plantiff Schmidth's Further Schmidth
Brand Umpletere Edita Impletere Brand Lampierere Brand La	43070024 51170024	0.40 1.50 4.00 0.50 0.50 0.50 0.50 0.50 0.50 0	997.5.00 \$027.5.00	\$370.00 \$370.00 \$370.00 \$370.00 \$370.00 \$470.0	Review and comments or dual Flores, Schroper, and Kennerly Flue 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Further Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and Schmidts' Further Supplemental Interrugatory response on Defendants Finalized Further Schmidts' Further Supplemental Interrugatory Further Schmidts' Further
Bana Umpierre Brian Umpierre	43070024 51120024 51120024 51120024 51120024 51120024 51120024 51120024 51120024 51720024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$3,700.0	Review and comments or dual fricos, Schroper, and Kennerly Jillus 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and serve Plantiff Schmidth's Further Supplemental Interrugatory response on Detendants Finalize and serve Plantiff Schmidth's Further Supplemental Interrugatory response on Detendants Finalize and serve Plantiff Schmidth's Further Supplemental Interrugatory response on Detendants Finalize and Schmidth's Further Supplemental Interrugatory response on Detendants Finalize and Schmidth's Further Supplemental Interrugatory response on Detendants Finalize and Schmidth's Further Schmidth
Bana Umpierre Brian U	43070024 51/10024	0.40 1.50 4.00 0.80 1.00 0.80 0.80 0.80 0.80 0.80 0	\$925.00 \$925.00	\$370.00 \$370.00 \$370.00 \$370.00 \$270.00 \$270.00 \$370.00 \$40.00	Review and comments or dual Flores, Schroper, and Kennerly Flue 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and some Plantife Schmidts' Further Expipelmental Interrugatory response to Defendant Fluence Supplemental Interrugatory Fluence Supplementation Interrugatory Fluence Supplementation Interrugatory Fluence Supplemental Interrugatory Fluence Supplementation Interrugatory Fluence Supplementation Interrugatory Fluence Supplementa
Bana Umpierre Brian U	43070024 51/10024 61/10024	0.46 1.50 4.00 0.80 0.80 0.80 0.80 0.80 0.80 0.8	\$925.00 \$925.00	\$370.00 \$3,700.05 \$740.00 \$740.00 \$822.00 \$12,00.00 \$822.00 \$12,00.00	Review and comments or dual Flores, Schroper, and Kennerly Flue 2 reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Further Schmidts' Further Supplemental Interrugatory response on Defendants Finalized Further Schmidts' Further Supplemental Interrugatory response on Defendants Finalized Further Schmidts' Fu
Brand Umplerer Edition Debender Brand Umplerer Bran	4:30/2024 5:17/2024 6:17/2024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$3,70.00 \$3,70.00 \$3,70.00 \$4,70.00 \$1,70.00 \$1,20.20 \$1,2	Review and comments or during from, Schroper, and Kennerly Finalizar and one relified geometry (Finalizar and one relified geometry (Finalizar and one relified geometry (Finalizar and one relified geometry) (Finalizar and one relimination of the second o
Bana Umpierre Ba	43070024 5170024 6170024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$370.00 \$370.00 \$370.00 \$200.00 \$200.00 \$200.00 \$312.00 \$31	Review and comments or dual Flores, Schroper, and Kennerly Miles 2 expert reports Finishize and serve Plantiff Schmidts Further Supplemental Interrugatory response to Defendant Finishize and serve Plantiff Schmidts Further Supplemental Interrugatory response to Defendant Finishize and serve Plantiff Schmidts Further Supplemental Interrugatory response to Defendant Finishize and serve Further Schmidts Further Supplemental Interrugatory response to Defendant Finishize and Schmidts Further Supplemental Interrugatory response to Defendant Finishize Call Will J. Thomson, C. Williace, M. Johnson or defense egent Said agent report and contract labor reductal Finishize Call Will J. Thomson, C. Williace, M. Johnson or defense egent Said agent report and contract labor reductal Finishize Call William Further Schmidts Further Schmidts Further Schmidts Further Schmidts Finishize Call William Further Schmidts Further Schmidts Finishize Call William Further Schmidts Further Schmidts Finishize Call William
Bana Umpierre Bran Umpierre Br	43070024 51/10024	0.46 1.50 4.00 0.80 1.00 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$370.00	Review and comments or dual Flores, Schroper, and Kennerly Miles 2 expert reports Finishize and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and some Planting Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory response on Defendants Finishize and Schmidts' Further Supplemental Interrugatory Further Schmidts' Further
Brand Umpletere Brand Umpleter	4:30/2024 5:17/2	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,700.00 \$3,100.0	Review and comments or during forces, Schroper, and Kennerly Fluid Sergents communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Detendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Detendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Detendants Finalize and Schmidts' Further Supplemental Interrugatory response on Detendants Finalize and Schmidts' Further Supplemental Interrugatory response on Detendants Finalized Further Schmidts' Further Supplemental Interrugatory Further Schmidts' Fu
Bana Umpierre Ba	4:30/2024 5:17/2024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$12.00.00 \$10.0	\$370.00 \$3,7	Review and comments or during from, Schroper, and Komenoly fluid 20 exports report Finishize and serve Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finishize and serve Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finishize and serve Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finishize and serve Planting Schmidts' Further Supplemental Interrugatory response on Detendants Finishize and Schmidts' Further Supplemental Interrugatory response on Detendants Finishize and Schmidts' Further Supplemental Interrugatory Further Schmidts' Further Schm
Bana Umpierre Brian U	4:30/2024 5:17/2024 6:17/2024	0.40 1.50 4.00 0.80 1.00 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$370.00 \$370.00 \$370.00 \$240.00 \$240.00 \$320.00 \$440.00 \$440.00 \$31,00 \$440.00 \$31,	Review and comments or dual Prices, Schroper, and Cennops (Paul 24) reports communications with Jr. Thorston, G. Wallace, and M. Johnson re same Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and serve Plantiff Schmidts' Further Supplemental Interrugatory response on Defendants Finalize and Schmidts' Comments Finalize and Schmidts' Schmidts' Schmidts' Comments Finalize and Schmidts' Schmidts' Schmidts' Schmidts' Comments Finalize and Schmidts' Schmidts' Schmidts' Comments Finalize and Schmidts' Comments Finalize and Schmidts' Schmidts' Comments Finalize and Schmidts' Comments
Brand Umplerer Edition Debend Brand Umplerer Brand	4:30/2024 5:17/2024 6:17/2024	0.40 1.50 4.00 0.80 1.50 0.80 0.80 0.80 0.80 0.80 0.80 0.80 0	\$922.00 \$922.00	\$370.00 \$3,700.0	Review and comments or dual fricose, Schroper, and Kennery Jimes 2 expert reports Finishize and serve Plantiff Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and serve Plantiff Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and Schmidt's Further Supplemental Interrugatory response on Defendants Finishize and Schmidt's Further Schmidt of Schmidt's Further Schmidt's Further Schmidt of Schmidt's Further

Brian Umpierre	7/11/2024	2.50	\$925.00	\$2,312.50	Review key staffing related Brookdale documents for selection for Fiores deposition preparation; email to M. Johnson, J. Thornton, G. Wallace re same
Brian Umpierre Brian Umpierre	7/11/2024 7/12/2024	0.30	\$925.00 \$925.00	\$277.50 \$555.00	Email communications with N. Johnson and 1. Thomton re Fibres drop prep document confidation Review letter bride re categories or cutstanding discovery, entail to N. Johnson or determining abstraction status and defense expert Satar's testimony re same
Brian Umpierre Brian Umpierre	7/12/2024 7/12/2024	0.20	\$925.00 \$925.00	\$185.00 \$277.50	Emails with J. Thornton, M. Johnson, G. Wallace re supplemental Schroyer declaration or report
Brian Umpierre	7/13/2024	6.50	\$925.00	\$6,012.50	Forward proposed edit to M. Johnson re discovery letter seeking to compet production of Brookdale's staffing formula In-person Rores deposition preparation with J. Thornton, C. Piores
Brian Umpierre Kathryn Stebner	7/14/2024 7/15/2024	8.00 2.00	\$925.00 \$1,300.00	\$7,400.00 \$2,600.00	In person Rores deposition preparation with J. Bronton, C. Rores Meet with B. Uniperior, C. Rores, and J. Bronton to, 21 Bronton, 22 Bront
Brian Umpierre Kathryn Stebner	7/15/2024 7/16/2024	9.00	\$925.00 \$1.300.00	\$8,325.00 \$780.00	In person Rores deposition preparation with 1. Bronton, C. Rores, including Zoom with 0. Wallace re same Meet with 0. Unprience restiffing penetr floors deposition preparation
Brian Umpierre	7/16/2024	0.40	\$925.00	\$370.00	Review text of supplemental Flores expert opinions; emails with J. Thornton re same
Brian Umpierre Kathryn Stebner	7/16/2024 7/17/2024	8.00 0.50	\$925.00 \$1,300.00	\$7,400.00 \$650.00	In person Rivers deposition preparation with J. Thornton, C. Flores, including Zoom with G. Wallace. Meet with B. Uniperier re staffing separal Plores depo prep of the Company of the Com
Brian Umpierre Brian Umpierre	7/17/2024 7/17/2024	0.30	\$925.00 \$925.00	\$277.50 \$92.50	Emails to M. Johnson, G. Wallace, J. Thomton re Schroyer supplemental report and production
Brian Umpierre Brian Umpierre	7/17/2024	0.20	\$925.00	\$185.00	Email correspondence with counsel re Zoom link for Flores deposition Email to M. Jahannon re Flores deposition and contract labor and recent production of invoices
Brian Umpierre Brian Umpierre	7/17/2024 7/17/2024	0.20	\$925.00 \$925.00	\$185.00 \$92.50	Serve Schroyer supplemental expert report and link to related production Email correspondence with counsel in Flores deposition that time Final correspondence with counsel in Flores deposition that time
Brian Umpierre	7/17/2024	5.50	\$925.00	\$5,087.50	In-person Flores depodition preparation with J. Thornton, C. Flores
Brian Umpierre Brian Umpierre	7/17/2024 7/18/2024	0.30 9.00	\$925.00 \$925.00	\$277.50 \$8,325.00	Email correspondence will G. Wallace re Piores testimony on numerosity Deposition of Cristina Rose, RN, PND Deposition of Cristina Rose, RN, PND
Kathryn Stebner Brian Umpierre	7/19/2024 7/19/2024	1.20 0.20	\$1,300.00 \$925.00	\$1,560.00 \$185.00	Meet with 8. Umplerer en outcome of staffling expert Rores depo and next steps Email to 1. Thomaton protential deposition of Plantiffer seperts hones and Belson
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 Umpierre Brian Umpierre	7/22/2024 7/22/2024	2.00	\$925.00 \$925.00	\$1,850.00 \$277.50	Review order granting in part and denying in part motion for certification of subclasses Email Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and team re-subclasses order Final Correspondence with J. Thornton and Thornton
Brian Umpierre	7/22/2024	0.30	\$925.00	\$277.50	Email to K. Stebner summarizing important points in subclasses certification order
Brian Umpierre Brian Umpierre	7/22/2024 7/22/2024	1.30 0.20	\$925.00 \$925.00	\$1,202.50 \$185.00	Summary highlights of Rores deposition testimony, forward with rough transcript to team Email to N. Honknown with available dates for deposition of defense expert to Ahlen
Brian Umpierre Kathryn Stebner	7/22/2024 7/23/2024	0.30	\$925.00 \$1,300.00	\$277.50 \$910.00	Forward named plaintiff depo transcripts to 1. Thormton re Rubbin deposition preparation Meet with 8. Universitient re subclassors certification order
Brian Umpierre	7/23/2024	2.00	\$925.00	\$1,850.00	Email to J. Thornton listing documents produced in discovery relevant to the Rubin deposition / preparation
Brian Umpierre Kathryn Stebner	7/23/2024 7/25/2024	0.70 0.50	\$925.00 \$1,300.00	\$647.50 \$650.00	Meeting with K. Stebner re certification of subclasses order Meet with B. Uniperior re defense open Affilian deposition preparation - strategy
Brian Umpierre Brian Umpierre	7/25/2024 7/26/2024	1.70 0.40	\$925.00 \$925.00	\$1,572.50 \$370.00	Compile and email to J. Thombon including link to service alignment production Email correspondence with J. Thombon en service alignment production and document production and document production and document production and document production and documents relevant to Rubin deposition preparation
Brian Umpierre	7/29/2024	1.00	\$925.00	\$925.00	Background research reservice alignment terms used in Brookdate documents; email to J. Thornton resame - Rubin deposition preparation
Brian Umpierre Brian Umpierre	7/29/2024 7/31/2024	0.20	\$925.00 \$925.00	\$185.00 \$277.50	Email correspondence with team ne Resident Service Detail Sheets - Rubin deposition preparation Forward to Hs. Absomb briefing is nilmay understaffing (injudyon or educations or pulsarly class remained in this case
Brian Umpierre	7/31/2024 8/5/2024	0.20 2.50	\$925.00 \$925.00	\$185.00	Review email summary of Rubin deposition; email to J. Thrornton re same
Brian Umpierre Brian Umpierre	8/6/2024	1.50	\$925.00	\$2,312.50 \$1,387.50	Review Sand, Schroyer, and Floores export reports and declarations re numerosity and proof of same; email and phone call with G. Wallace re same Email correspondence with G. Wallace re defense expert Sand opinions to be addressed by Plaintiffs' experts on rebuttal
Brian Umpierre Kathryn Stebner	8/7/2024 8/8/2024	4.20 0.30	\$925.00 \$1.300.00	\$3,885.00 \$390.00	Compile spreadshee of Executive Director humanes in relation to average % variance from benchmark, re Plaintiffs' expert rebuttal reports Discussion with M. Unimier ne Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro one centrel five 102 class and Discussion with M. Unimier net Deformative micro of the M. Unimier ne
Brian Umpierre	8/8/2024	0.30	\$925.00	\$277.50	Email to M. Johnson re Plaintiffs' experts rebuttal points to defense experts Saad and Allen
Brian Umpierre Brian Umpierre	8/8/2024 8/9/2024	1.00 5.70	\$925.00 \$925.00	\$925.00 \$5,272.50	Review Defendants' motion to describly (p)(2) class That Flores upplemental rebuilt along point, forward to 1. Thorston for review and comment. That Flores upplemental rebuilt along point, forward to 1. Thorston for review and comment.
Brian Umpierre Brian Umpierre	8/12/2024 8/12/2024	2.30 1.50	\$925.00 \$925.00	\$2,127.50 \$1,387.50	Telephone call and emails with 1. Thombon re defense expert Saud opinions/criticisms re Executive Directors and contract labor time considerations in Paintiffer operts' analysis Email Correspondence with 1. Thombor re periods of residently of ear chan and position of the opinion of the opi
Brian Umpierre	8/12/2024	0.40	\$925.00	\$370.00	Review J. Thornton draft of Flores supplemental rebuttal report; further edits and resend for comments
Brian Umpierre Brian Umpierre	8/12/2024 8/13/2024	0.40	\$925.00 \$925.00	\$370.00 \$277.50	Forward draft Flores suppliebetal expert rebutal report to G. Wollace for review and comment, telephone call re same Emails with G. Wallace er Flores suppliebemental expert rebutal report and labor benchmarks
Brian Umpierre	8/13/2024 8/14/2024	0.20	\$925.00 \$925.00	\$185.00	Email to C. Wallace with final version of Flores supplemental expert relutal report and document production related to same Email correspondence with G. Wallace re Flores supplemental power technical response to the release of the relation of the relatio
Brian Umpierre Brian Umpierre	8/15/2024	0.10 3.50	\$925.00	\$92.50 \$3,237.50	Analysis of contract labor data, including LDR reports and newly produced invoices - re rebuttal to defense expert Saad criticisms
Brian Umpierre Brian Umpierre	8/15/2024 8/15/2024	0.30	\$925.00 \$925.00	\$277.50 \$277.50	Email and telphone conversations with G. Wallisce and J. Thornton re analysis of contract tabor data produced by Brookdale Serve Flores supplemental expert related report on Defendants
Brian Umpierre	8/21/2024	0.10	\$925.00	\$92.50	Email correspondence with G. Walace, M. Johnson re expert depositions and schedule
Brian Umpierre Brian Umpierre	8/23/2024 8/23/2024	0.30	\$925.00 \$925.00	\$277.50 \$370.00	Arrange court reporter for deposition of defense appert Josh Allem Draft deposition notice to defense separt Josh Allem Draft deposition notice to defense separt Josh Allem
Brian Umpierre Brian Umpierre	8/23/2024 8/27/2024	0.20	\$925.00 \$925.00	\$185.00 \$277.50	Email correspondence with C. Flores, G. Wallace re meeting to discuss nature of a satisfied living and sensices provided therein Email correspondence with M. Johnson e Zoom with experts. Flores to discuss represent for
Brian Umpierre	8/28/2024	0.30	\$925.00	\$277.50	Serve Josh Allen deposition notice
Brian Umpierre Brian Umpierre	8/28/2024 8/28/2024	1.20 8.80	\$925.00 \$925.00	\$1,110.00 \$8,140.00	Zoom with G. Wallace, M. Johnson, T. Bhomson re prepare for deposition of defense expert Joh Allen John Allen deposition preparation - compile perferent registations are provision of medical type care, restricted/therespecutic health conditions and incorporate into deposition outline
Kathryn Stebner	8/29/2024 8/29/2024	0.80	\$1,300.00	\$1,040.00	Discussion with B. Umpierre re strategy for deposition of Josh Allen (RN)
Brian Umpierre Brian Umpierre	8/29/2024 8/29/2024	8.50 0.10	\$925.00 \$925.00	\$7,862.50 \$92.50	Josh Allen deposition preparation - compile/dartin dutiline and prepare enhibits Email to beam expert deposition correage for deference spert Baird
Brian Umpierre Brian Umpierre	8/30/2024 8/31/2024	0.40 6.70	\$925.00 \$925.00	\$370.00 \$6,197.50	Email correspondence with J.Johnson ne defense expert Saad opinions mischaracterizing Plaintiffs' expert Plores' testimony John Allen despotion preparation - complicial net utilize and presper exhibits John Allen despotion preparation - complicial network and presper exhibits
Brian Umpierre	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 Kathryn Stebner	9/2/2024 9/2/2024	0.50 1.10	\$1,300.00 \$1,300.00	\$650.00 \$1,430.00	Review darf Allin deposition outlies, discuss same with 8. Umpierre Discuss latest darf at Allin deposition outlies with 8. Umpierre Discuss latest darf at Allin deposition outlies with 8. Umpierre
Brian Umpierre Brian Umpierre	9/2/2024 9/2/2024	0.50 3.70	\$925.00 \$925.00	\$462.50 \$3.422.50	Phone call with 0. Wallace re Allen deposition outline Further edits to Man deposition outline and compile exhibits and potential exhibits, based on conversation with 6. Wallace re same
Brian Umpierre	9/2/2024	2.50	\$925.00	\$2,312.50	Draft B. Umpierre declaration in support of opposition to motion to decertify refacts concerning Defendants' claim that upwards 70% of the subclasses are former residents; forward same to J. Thornton for comment
Kathryn Stebner Kathryn Stebner	9/3/2024 9/3/2024	0.50 1.00	\$1,300.00 \$1,300.00	\$650.00 \$1,300.00	Review revised draft Allien deposition outline Discuss revised Allien deposition outline Discuss revised Allien deposition outline and deposition strategy with B. Umpierre, KG
Brian Umpierre Brian Umpierre	9/3/2024 9/3/2024	0.70 0.40	\$925.00 \$925.00	\$647.50 \$370.00	Further cetts to B. Umpierre dectaration in support of apposition to motion to decently, forward to G. Wallace, J. hormton for review and comment Email to J. Thornton ne defense upent Pada's numerously supplys and supporting days
Brian Umpierre	9/3/2024	2.00	\$925.00	\$1,850.00	Review defense expert Saad's datasets used for numerosity analysis
Brian Umpierre Brian Umpierre	9/3/2024 9/3/2024	0.50 6.50	\$925.00 \$925.00	\$462.50 \$6,012.50	Citations to docket no opposition to motion to decentify, forward to co-counsed to obtain the common to continue the common to continue the common to continue the common to common the common the common to common the common to common the common to common the c
Brian Umpierre	9/3/2024	0.40	\$925.00	\$370.00	Review Allen contract and discussion with K. Craven re same
Brian Umpierre Brian Umpierre	9/3/2024 9/3/2024	1.20 0.60	\$925.00 \$925.00	\$1,110.00 \$555.00	Futher edits to B. Umpierre dectaration in support of opposition to motion to decertify,based on G. Wallace comments and resend to G. Wallace
Brian Umpierre Brian Umpierre	9/4/2024 9/4/2024	5.50 0.60	\$925.00 \$925.00	\$5,087.50 \$555.00	Deposition of defense eaper Losh Allam Summarrison to supply the Control of the
Brian Umpierre	9/4/2024	0.40	\$925.00	\$370.00	Phone call with G. Wallace re Josh Allen deposition
Kathryn Stebner Brian Umpierre	9/5/2024 9/5/2024	1.70 0.20	\$1,300.00 \$925.00	\$2,210.00 \$185.00	Discussion with El. Unipierre re Allen depo on 9/4 Email Correspondence with M. Johnson to defense sepert Baird deposition coverage
Brian Umpierre Kathryn Stehner	9/6/2024 9/7/2024	1.50	\$925.00 \$1,300.00	\$1,387.50 \$390.00	Email to M. Johnson re defense expert Saad deposition and potential questions for same Discussion with M. Unprienze re coverage of Julie Balar (19(N) (490 pc)
Brian Umpierre	9/7/2024	1.70	\$1,300.00	\$390.00	LISCLESSON WITH B. LIMPETER COVERAge of LILLUE BASING (1940) depo Email Correspondence with M. Johnson re additional potential questions for defense expert Saad deposition re residents without assessed needs
Brian Umpierre Brian Umpierre	9/8/2024 9/9/2024	0.30	\$925.00 \$925.00	\$277.50 \$277.50	Email correspondence with N. Johnson and G. Walkzer en defentue expert Saud deposition topics Review invoices re most-recent deposition of Dr. Fores and an email to G. Curticide it is same
Kathryn Stebner	9/10/2024	1.10	\$1,300.00	\$1,430.00	Meet with B. Umpierre re Baird deposition strategy post-Allen deposition
Brian Umpierre Brian Umpierre	9/10/2024 9/10/2024	0.20 0.80	\$925.00 \$925.00	\$185.00 \$740.00	Email with M. Johnson er defentre expert Baird deposition schedule/date Review Sand deposition outlies and earni and N. Johnson with comments re same
Kathryn Stebner Brian Umpierre	9/11/2024 9/11/2024	0.70 6.00	\$1,300.00 \$925.00	\$910.00 \$5,550.00	Review draft Barid deposition outline Review draft Barid deposition outline Review draft Barid deposition outline Review deposition of defense expent Saud including emails to M, Johnson with possible follow up questions
Brian Umpierre	9/11/2024	0.40	\$925.00	\$370.00	Review draft of reply in support of request for order certying issue for appeal and comments to G. Wallace re same
Brian Umpierre Brian Umpierre	9/13/2024 9/13/2024	0.80 2.50	\$925.00 \$925.00	\$740.00 \$2,312.50	Decentification / summany judgment hearing preparation - email correspondence with G. Wallace, R. Bonner re list of potential class members (ie, non-arb residents) Decentification / summany judgment hearing preparation - emails and phone culcils with T. Thornton and B. Peters re does used its and data sufficient entermine class members status
Brian Umpierre	9/14/2024	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 Umpierre Brian Umpierre	9/17/2024 9/17/2024	0.60 0.20	\$925.00 \$925.00	\$555.00 \$185.00	Draft deposition notice for defense expert Blard and work with S. Green to obtain court reporter Serve deposition notice for defense expert Blard
Brian Umpierre Brian Umpierre	9/17/2024 9/17/2024	0.40 2.00	\$925.00 \$925.00	\$370.00 \$1.850.00	Emails O. Wallace re resident ID issues contained in Rutner declaration supporting Defendant's motion to decentify. Diret memore be grounded set fails in recorded information necessary to match the producer storage of the resident's from the 6 subject facilities whose claims are not subject to arbitration.
Brian Umpierre	9/18/2024 9/18/2024	7.20 1.50	\$925.00 \$925.00	\$6,660.00 \$1,387.50	Review discovery file and expert materials, including class lists and Flores materials, regarding numerosity critiques in preparation for Decertification hearing tomorrow, calls and emails with G. Wallace and J. Thornton re same
Brian Umpierre Brian Umpierre	9/18/2024	0.90	\$925.00	\$832.50	Emails with R. Stoyer to previous productions of resident information in terrol Pulmer descriffication declaration claims or numerously-related data Descriffication 2 manumary judgmentioning preparation - emails with 1. Thornton no production of early consumed and FPP claims its st
Brian Umpierre Brian Umpierre	9/18/2024 9/18/2024	2.90 1.60	\$925.00 \$925.00	\$2,682.50 \$1,480.00	Decertification / summany judgmentheating preparation - emails and phone calls with G. Wallace re production of daily census data re numerosity and FSP class list Decertification / summany judgment hearing preparation - work with R. Bonner to determine time periods for which BKD produced assessment data, per facility
Brian Umpierre	9/18/2024	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 Brian Umpierre	9/19/2024 9/19/2024	0.80	\$1,300.00 \$925.00	\$1,040.00 \$277.50	Meet with 8. Limpeirer ne class decertification hearing Decertification or
Brian Umpierre Brian Umpierre	9/19/2024 9/19/2024	0.30	\$925.00 \$925.00	\$277.50 \$555.00	Decemification / summary judgment hearing preparation - telephone call with G. Wallace re numerously evidence Travel to decertification hearing (INC Q. Odashard)
Brian Umpierre	9/19/2024	0.30	\$925.00	\$277.50	Decertification hearing preparation with G. Wallace
Brian Umpierre Brian Umpierre	9/19/2024 9/19/2024	0.50	\$925.00 \$925.00	\$462.50 \$370.00	Decentification bearing (ND Cod., Judge Gilliam) Meet/discuss with G. Williace, G. Gurlindi, J. Yellin post-decertification hearing restatus, schedule, Dauberts
Brian Umpierre Kathryn Stebner	9/20/2024 9/23/2024	1.00 0.40	\$925.00 \$1,300.00	\$925.00 \$520.00	Team call - re post-hearing tasks and strategy Review reviews Basin dego outline
Kathryn Stebner	9/23/2024	0.60	\$1,300.00	\$780.00	Discussion with B. Umpierre, K. Guadagni re revised Baird deposition outline
Brian Umpierre Brian Umpierre	9/23/2024 9/23/2024	0.80	\$925.00 \$925.00	\$740.00 \$277.50	Email to Palantiffs' expert Reviews re defense expert Bland export report and deposition Discussion with K. Sobber re defense expert Bland deposition and preparation for same
Brian Umpierre	9/23/2024 9/23/2024	0.30 8.60	\$925.00 \$925.00	\$277.50 \$7,955.00	Phone call with J. Thornton re defense expert Baird deposition
Brian Umpierre Brian Umpierre	9/23/2024	0.30	\$925.00	\$277.50	Bard deposition preparation - draft questions and outline; prepare civilibits Email correspondence with expert. Civiler se potential questions for deposition for defense expert Baild
Brian Umpierre Brian Umpierre	9/23/2024 9/23/2024	0.10 0.30	\$925.00 \$925.00	\$92.50 \$277.50	Forward E. Feet's responses to questions are Bailed deposition to K. Stebner and K. Gaudagaji for comment Telphone call With C. Walkser or defines expert Bailed deposition preparation
Kathryn Stebner Brian Umpierre	9/24/2024 9/24/2024	0.80	\$1,300.00 \$925.00	\$1,040.00 \$925.00	Neet with B. Umplerer Baird depo on 9/24 Baird deposition encouration reduction (soft and outline
Brian Umpierre	9/24/2024	4.70	\$925.00	\$4,347.50	Draft / outline defense expert Allen Daubert motion / motion to exclude testimony
Brian Umpierre Brian Umpierre	9/24/2024 9/24/2024	6.00 0.30	\$925.00 \$925.00	\$5,550.00 \$277.50	Deposition of defense eapert, Julie Baint Email summany of Baint deposition highlights to G. Waltace
Brian Umpierre	9/25/2024	0.50	\$925.00	\$462.50	Yearn call re deposition / discovery update; updates on motions to exclude
Brian Umpierre Brian Umpierre	9/25/2024 9/25/2024	9.50 0.40	\$925.00 \$925.00	\$8,787.50 \$370.00	Drift defense expert Allen Daubert motion / motion to seclude testimony Email to 0. Visibles re defense expert Allen Daubert motion / motion to seclude testimony Email to 0. Visibles re defense expert Allen knowledge/pergenience re classification of barriers
Brian Umpierre	9/25/2024	7.80	\$925.00	\$7,215.00	Draft motion to exclude certain testimony of defense expert Allen
Kathryn Stebner Kathryn Stebner	9/26/2024 9/26/2024	1.60 0.40	\$1,300.00 \$1,300.00	\$2,080.00 \$520.00	Review draft motion to exclude Allen testimony Heet with 8. Livingeriere et draft motion to exclude Allen expert testimony
Brian Umpierre Brian Umpierre	9/26/2024 9/26/2024	6.50 1.00	\$925.00 \$925.00	\$6,012.50 \$925.00	Complete motion to exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits: Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert Allor, drift 8. Uniquiere declaration in support of same and prepare exhibits Ellie motion be exclude certain testimony of defense expert and exhibits Ellie motion be exclude certain testimony of declaration in support of same and exhibits Ellie motion be excluded and exhibits Ellie motion be exhib
Brian Umpierre	9/26/2024	1.00	\$925.00	\$925.00	Further edits to motion to exclude Allen testimony based on G. Wallace comments
Brian Umpierre Brian Umpierre	9/27/2024 9/27/2024	3.70 1.00	\$925.00 \$925.00	\$3,422.50 \$925.00	Administrative motion to file under seal portions of motion to exclude Allem testimony Team call or summary judgment arguments
Brian Umpierre	9/27/2024	0.30	\$925.00	\$277.50	Telephone call with G. Wallace re oppositions to Defendants' motions to exclude Plaintiffs' experts' testimony
Brian Umpierre Brian Umpierre	9/27/2024 9/30/2024	4.50 0.80	\$925.00 \$925.00	\$4,162.50 \$740.00	Correspondence with Court clark refiling of motion to exclude Allen testimony - under seal/correct filing, work with J. Yellin and other staff to complete Draft (proposed) order and review papers for refiling motion to exclude Allen testimony per this morning's Order
Brian Umpierre Brian Umpierre	9/30/2024 10/1/2024	1.00 5.50	\$925.00 \$925.00	\$925.00 \$5,087.50	Work with co-coursed to refile motion to sectuale Allen testimony Legal research the septret statismory on inside questions of standstart and conclusions
Brian Umpierre	10/1/2024	2.50	\$925.00	\$2,312.50	Legal research re legal standard to exclude expert opinion as legal conclusion; email to G. Wallace re same re Intervention911 v. City of Palm Springs
Brian Umpierre Brian Umpierre	10/1/2024 10/1/2024	4.30 0.50	\$925.00 \$925.00	\$3,977.50 \$462.50	Drift opposition to Deferficiation's motions to exclude testimony from Plaintiff's experts Feam meeting re-positions to Deferdants motions to exclude Feam meeting re-positions to Defermants motions to exclude
Kathryn Stebner	10/2/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre re coverage for motions to exclude and oppositions to same

Brian Umpierre	10/2/2024	4.60	\$925.00	\$4,255.00	Legal research re motions to exclude/Dauberts Team call status of assignments on motions to exclude
Brian Umpierre	10/4/2024	1.00	\$925.00	\$925.00	
Brian Umpierre	10/5/2024	5.20	\$925.00	\$4,810.00	Draft insert re oppositoin to motion in limine/exclude re experts' references to standards, legal research re same Review expert deposition transcripts for confidential designations
Brian Umpierre	10/10/2024	0.40	\$925.00	\$370.00	
Brian Umpierre	10/10/2024	0.10	\$925.00	\$92.50	Emails with G. Wallace re confidential designations in/of expert deposition transcripts Review motion to exclude defense expert Anderson opinions
Brian Umpierre	10/10/2024	0.50	\$925.00	\$462.50	
Brian Umpierre	10/10/2024	0.30	\$925.00	\$277.50	
Brian Umpierre Brian Umpierre Brian Umpierre	10/14/2024 10/14/2024 10/16/2024	3.50 6.80	\$925.00 \$925.00 \$925.00	\$3,237.50 \$6,290.00	Email to G. Wallace re comments on draft motion to seclude options of defense expert Anderson Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Draft reply in support of motion to exclude testimony of defense expert Allen Dr
Kathryn Stebner Kathryn Stebner	10/17/2024 10/17/2024 10/17/2024	0.50 0.40	\$1,300.00 \$1,300.00	\$650.00 \$520.00	Chair (epy) in Support on Indicate December examining or General Expert vision, or Wallact for review and Comment. Review operative draft of motion to exclude Allen testimony Discuss operative draft of motion to exclude Allen testimony Discuss operative draft of motion to exclude Allen expert testimony
Brian Umpierre Brian Umpierre	10/17/2024 10/17/2024 10/17/2024	3.50 2.50	\$925.00 \$925.00	\$3,237.50 \$2,312.50	uss.co. uperaure usin or introduce accurate values report reasoning of defense expert Allen Edits and revisions to reply in support of motion to exclude tetimony of defense expert Allen Review comments and edits from G. Wallace, et al. and finalize reply in support of motion to exclude testimony of defense expert Allen; forward for to co-counsel for filing
Kathryn Stebner Brian Umpierre	10/18/2024 10/18/2024	1.00	\$1,300.00 \$925.00	\$1,300.00 \$1,572.50	Discussion with 0. Umpliers or trial responsibilities Team call - trial preparation task/assignments
Brian Umpierre Brian Umpierre	10/18/2024 10/21/2024	1.00	\$925.00 \$925.00	\$925.00 \$1.572.50	Meeting with Schemer retrial and intereporabilities Review motion to exclude Plaintiffs' expert Kennedy's testimony and Defendants' reply in support of its motion on all Plaintiffs' experts
Brian Umpierre	10/22/2024	6.50	\$925.00	\$6,012.50	Legal research re modions in limitime for evidence tending to prejudice / cause confusion Discussion with K. Guadagni re use of "day in the life" video at trial and use of video at trial generally - trial preparation
Brian Umpierre	10/24/2024	0.30	\$925.00	\$277.50	
Brian Umpierre Brian Umpierre	10/25/2024 10/30/2024	1.50	\$925.00 \$925.00	\$1,387.50 \$185.00	Team call - trial preparation tasked assignments Feam call - frial preparation tasked assignments Email to G. Grunfeld, G. Wallace re Heather Fisher's (consensator) ability to testify on behalf of Plaintiff Schmidt
Brian Umpierre	11/1/2024	1.50	\$925.00	\$1,387.50	Team call - trial preparation tasks/assignments Review Heather Fisher (Schmidt conservator) deposition transcript re trial testimony preview
Brian Umpierre	11/4/2024	3.50	\$925.00	\$3,237.50	
Brian Umpierre	11/5/2024	5.70	\$925.00	\$5,272.50	Review H. Fisher discovery responses re potential trial testimony and compile Ralph Schmidt's encountered barriers and all evidence in record pertaining to him regarding access - trial preparation Compile Plaintiff Schmidt's encountered barriers and all evidence in record pertaining to him regarding access including testimony re same - trial preparation
Brian Umpierre	11/7/2024	6.50	\$925.00	\$6,012.50	
Brian Umpierre Kathryn Stebner	11/7/2024 11/8/2024	0.30	\$925.00 \$1,300.00	\$277.50 \$1,040.00	Telephone call with G. Wallace re Plaintiff Schmidt damages Meet with B. Umpierre re status of pretrial activities / trial testimony
Brian Umpierre	11/8/2024	1.30	\$925.00	\$1,202.50	Team call - trial preparation tasks/assignments Compile Plaintiff Schmidt's encountered barriers and all evidence in record pertaining to him regarding access including testimony re-same - trial preparation
Brian Umpierre	11/8/2024	4.80	\$925.00	\$4,440.00	
Brian Umpierre	11/11/2024	0.30	\$925.00	\$277.50	Email to G. Wallace re conservator testimony / hearsay Conference call with J. Yellin, G. Grunfeld, G. Wallace, M. Johnson - trial preparation / strategy
Brian Umpierre	11/11/2024	1.30	\$925.00	\$1,202.50	
Brian Umpierre	11/11/2024	0.50	\$925.00	\$462.50	Telephone call with G. Wallace re damages for intentional discrimination Legal research re valuing damages for intentional discrimination
Brian Umpierre	11/11/2024	5.00	\$925.00	\$4,625.00	
Brian Umpierre Kathryn Stebner	11/11/2024 11/12/2024	0.30	\$925.00 \$1,300.00	\$277.50 \$520.00	Email to H. Fisher (Schmidt conservator) re trial schedule, expectations Review notes of 11/12 CMC
Kathryn Stebner	11/12/2024	0.50	\$1,300.00	\$650.00	Meet with B. Umpierre re CMC and motions in limine and other pretrial filings Compile evidence of requests for accommodation in pretrial documents
Brian Umpierre	11/12/2024	6.00	\$925.00	\$5,550.00	
Brian Umpierre	11/12/2024	0.40	\$925.00	\$370.00	Review J. Yellin's email notes of case management conference Edit list of potential motions in limine in light of case management conference outcome
Brian Umpierre	11/13/2024	0.30	\$925.00	\$277.50	
Brian Umpierre	11/13/2024	1.00	\$925.00	\$925.00	Team call - next steps following case management conference Draft motion in limine seeking to exclude evidence of class member conduct as excuse
Brian Umpierre	11/13/2024	5.70	\$925.00	\$5,272.50	
Brian Umpierre	11/14/2024	6.70	\$925.00	\$6,197.50	Draft motion in limine seeking to exclude evidence of class member conduct as excuse Edits to Plaintiff expert Kennedy's supplemental expert report
Brian Umpierre	11/14/2024	0.40	\$925.00	\$370.00	
Brian Umpierre	11/15/2024	4.00	\$925.00	\$3,700.00	Draft motion in limine seeking to exclude evidence of class member conduct as excuse Team call re exchange and timing of pretrial submissions
Brian Umpierre	11/15/2024	1.00	\$925.00	\$925.00	
Brian Umpierre Brian Umpierre	11/15/2024 11/15/2024	0.50	\$925.00 \$925.00	\$462.50 \$3,700.00	Telephone call with G. Grunfield re H. Fisher (Schmidt conservator) and trial, anticipated testimony Compile materials relating to Plaintiffs' expert Dr. Flores for 11/19 exchange with defense, including exhibit list
Brian Umpierre Brian Umpierre	11/15/2024 11/17/2024	0.30	\$925.00 \$925.00	\$277.50 \$1,850.00	Telephone call with H. Fisher (Schmidt conservator) re trial Send J. Yellin list of documents to be added to exhibit list relevant to testimony from Dr Flores
Brian Umpierre Brian Umpierre Brian Umpierre	11/17/2024 11/18/2024 11/18/2024	1.40 1.00	\$925.00 \$925.00 \$925.00	\$1,850.00 \$1,295.00 \$925.00	Sens J. Yeulin us of occuments so de adoes to element us relevant to estimony from Ur Hories Compille Flores documents appearing on exhibit list and orinard to D. Edmunson Call with counsel re status of pretrial fillings and stipulated facts
Kathryn Stebner Brian Umpierre	11/18/2024 11/19/2024 11/19/2024	0.40 0.40	\$925.00 \$1,300.00 \$925.00	\$520.00 \$520.00	Call wan counted restances or prema image and explanate facts Meet with B. Umplerer e call with defense re pretrial fillings, stipulated facts Legal research re documentation required of successors to deceased class members in settlement context.
Brian Umpierre Brian Umpierre	11/19/2024 11/19/2024	0.30	\$925.00 \$925.00	\$277.50 \$3,515.00	Engli research re viaibility of defense argament that providing assistance to overcome barriers defeats ADA liability
Kathryn Stebner Brian Umpierre	11/20/2024 11/20/2024	0.80	\$1,300.00 \$925.00	\$1,040.00 \$277.50	Review draft motions in limine re classramenber conduct, providing assistance Email correspondence with G. Wallace re relevance of anticipated Saad testimony to disabilities, scoping
Brian Umpierre Brian Umpierre	11/20/2024 11/20/2024 11/20/2024	1.00	\$925.00 \$925.00	\$925.00 \$462.50	Emaccon exponence win G. Wallact et eteratic or amicipamia assau teamining or disabilities, scoping Team call – motions in limine, depo designations, exhibit and witness lists Review and edit Plaintiffs' list of motions in limine in amicipation of meet and confer with defense tomorrow
Kathryn Stebner Brian Umpierre	11/21/2024 11/21/2024	1.30	\$1,300.00 \$925.00	\$1,690.00 \$647.50	Meet with 8. Umplerer e motions in limine and neglections with counsel re same Edits to motion in limine to exclude evidence of class member conduct as excuse - add section on customizations
Brian Umpierre Brian Umpierre	11/21/2024 11/24/2024	1.30	\$925.00 \$925.00	\$1,202.50 \$925.00	Meeting with K. Stebner re motions in limine and negotiablons with coursel are scarce. 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 Umpierre Kathryn Stebner	11/24/2024 11/24/2024 11/25/2024	0.60 0.40	\$925.00 \$925.00 \$1,300.00	\$555.00 \$520.00	Principle data to district in motion in minimize to extract encounter of class intended conduct as extracts; roward to distribute for review and comment. Telephone cas with G. Wallacce re jury se bench trial Discussion with B. Umpierre re jury se bench trial
Brian Umpierre Brian Umpierre	11/25/2024 11/25/2024 11/25/2024	1.00	\$925.00 \$925.00	\$925.00 \$5,180.00	uss.com with defense ne motions in limine, time estimates Finalize motion in limine seeking to exclude evidence of class member conduct as excuse incorporating G. Wallace edits
Brian Umpierre Brian Umpierre	11/25/2024 11/25/2024 11/26/2024	0.30	\$925.00 \$925.00	\$277.50 \$1,942.50	rinianze monton in with its exemiting to include evidence or class silentine conduct as excise incorporating or variable equits. Telephone condition is with its Stebare re july viz. bench trial. Review defendants' objections, counterdesignations, and exhibits
Kathryn Stebner	11/25/2024 11/27/2024 11/27/2024	1.10	\$1,300.00	\$1,942.50 \$1,430.00 \$1,040.00	Review Defendants' motions in limine
Kathryn Stebner Brian Umpierre Brian Umpierre	11/27/2024 11/27/2024 11/27/2024	0.80 0.50 5.50	\$1,300.00 \$925.00 \$925.00	\$462.50 \$5,087.50	Discuss Detendants' motions in limine and proposed responses with B. Umpierre Teach Toom - status of pretrial projects and assignments Review Detendants' motions in limine; notes/coldline responses to 1 and 2
Kathryn Stebner	11/29/2024	0.70	\$1,300.00	\$5,087.50 \$910.00 \$650.00	Phone calls with B. Umpierre re jury vs bench trial
Kathryn Stebner Brian Umpierre	11/29/2024 11/29/2024	0.50 0.70	\$1,300.00 \$925.00	\$647.50	Zoom with B. Umpierre, Grunfeld, Yellin, Wallace, Johnson re jury vs bench trial Phone calls with K. Stebner re jury vs bench trial
Brian Umpierre	11/29/2024	0.50	\$925.00	\$462.50	Zoom among J. Yellin, G. Grunfeld, K. Stebner. G. Wallace, M. Johnson re bench vs. jury trial Draft opposition to Defendants' motion in limine re Mastin/Waters supplemental expert reports
Brian Umpierre	12/1/2024	10.00	\$925.00	\$9,250.00	
Brian Umpierre	12/2/2024	12.50	\$925.00	\$11,562.50	Draft opposition to Defendants' motion in limine re 2017 letters from Plaintiffs' counsel Review final drafts of Plaintiffs' oppositions to Defendants' motions in limine
Kathryn Stebner	12/3/2024	0.60	\$1,300.00	\$780.00	
Kathryn Stebner	12/3/2024	0.30	\$1,300.00	\$390.00	Discuss final drafts of Plaintiffs' oppositions to Defendants' motions in limine with 8. Umpierre Finalize opposition to Defendants' motion in limine re 2017 leters, including exhibits, and forward to co-counsel for filing
Brian Umpierre	12/3/2024	3.00	\$925.00	\$2,775.00	
Brian Umpierre	12/3/2024	7.50	\$925.00	\$6,937.50	Finalize opposition to Defendants' motion in limine re Mastin and Waters supplemental expert reports, including exhibits and forward to co-counsel for filing Review Defendants' oppositions to Plaintiffs' motions in limine
Brian Umpierre	12/4/2024	2.00	\$925.00	\$1,850.00	
Kathryn Stebner	12/5/2024	0.50	\$1,300.00	\$650.00	Meet with 8. Umpierre re results of meet and confer with Defendants re pretrial issues Meet and confer with Defendants re pretrial issues
Brian Umpierre	12/5/2024	1.00	\$925.00	\$925.00	
Brian Umpierre	12/5/2024	0.50	\$925.00	\$462.50	Team after-call to discuss results of meet and confer with Defendants repretrial issues Review latest iteration of jury instructions and case authorities re intentional discrimination
Brian Umpierre	12/5/2024	2.90	\$925.00	\$2,682.50	
Brian Umpierre	12/6/2024	0.50	\$925.00	\$462.50	Team call - pretrial matters including mock trial and jury vs. bench Review Rores expert reports re numerosity figures
Brian Umpierre	12/12/2024	0.40	\$925.00	\$370.00	
Brian Umpierre	12/12/2024	0.10	\$925.00	\$92.50	Email to G. Wallace re Flores testimony on numerosity Telephone call with G. Wallace re pretrial issues
Brian Umpierre	12/12/2024	0.40	\$925.00	\$370.00	
Brian Umpierre	12/12/2024	2.80	\$925.00	\$2,590.00	Review defense expert Allen's deposition transcript and putil 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 summany judgment
Kathryn Stebner	12/13/2024	0.70	\$1,300.00	\$910.00	Review B. Umpletre email re orders on motions for summary judgment and discuss import for case going floward Review orders on motions for summary judgment; email to K. Stebner summarizing same and re import for case going forward
Brian Umpierre	12/13/2024	2.00	\$925.00	\$1,850.00	
Brian Umpierre	12/13/2024	0.70	\$925.00	\$647.50	Meet with K. Stebner re orders on motions for summary judgment and impact on case Mock trial
Brian Umpierre	12/14/2024	9.00	\$925.00	\$8,325.00	
Brian Umpierre	12/14/2024	0.40	\$925.00	\$370.00	Email to G. Wallace re summany thoughts on mock trial Discuss mock trial results with B. Umpierre - trial strategy
Kathryn Stebner	12/16/2024	1.50	\$1,300.00	\$1,950.00	
Brian Umpierre	12/16/2024	5.70	\$925.00	\$5,272.50	Prepare for pretrial conference - compile and review pretrial statements, tirial brief; prepare to argue motions in limine
Brian Umpierre	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 update from 8. Umplerre on results of 12/17 pretrial conference Pretrial conference - N.D. Cal., Judge Gilliam
Brian Umpierre	12/17/2024	3.00	\$925.00	\$2,775.00	
Brian Umpierre	12/18/2024	2.00	\$925.00	\$1,850.00	Review draft injunction; edit to include staffing/monitoring terms Review email correspondence re Plaintiff Algarme (confidential)
Brian Umpierre	12/19/2024	0.40	\$925.00	\$370.00	
Brian Umpierre	12/19/2024	6.50	\$925.00	\$6,012.50	Review development of Mastin and Waters opinions vis a vis Defendants' experts and summary judgment arguments Meet with B. Umpierre re staffing elements of draft injunction, pretrial statemnt, revised motions in limine
Kathryn Stebner	12/20/2024	1.50	\$1,300.00	\$1,950.00	
Brian Umpierre	12/20/2024	1.30	\$925.00	\$1,202.50	Review list of newbrevised motions in limine and revised witness list in advance of team meeting
Brian Umpierre	12/20/2024	1.00	\$925.00	\$925.00	Team call - revised motions in limine, revised witness list, further pretrial projects
Brian Umpierre	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 ROFEs Meeting with K. Stebner re staffing elements of draft injunction, pretrial statement, revised motions in limine
Brian Umpierre	12/20/2024	1.50	\$925.00	\$1,387.50	
Brian Umpierre Brian Umpierre	12/23/2024 12/29/2024 12/29/2024	0.60 1.00 4.50	\$925.00 \$925.00 \$925.00	\$555.00 \$925.00 \$4.162.50	Pretrial meet and confer with defense- motions in limine, issues for trial, jury vs. bench, resident / class list Team call re case schedule, needed discovery, and strategimotions Draft resident from in limine seeding the sculde autiguments class member conduct as an excuse and circulate to team
Brian Umpierre Brian Umpierre	12/30/2024	1.10	\$925.00	\$1,017.50	Incorporate G. Wallace edits and fill cities to motion in timine seeking to exclude arguments re class member conduct as an excuse; recirculate to team
Brian Umpierre	12/30/2024	0.30	\$925.00	\$277.50	Telephone call with G. Wallace re pretial filings and Court's expectations about meet and confer/issues for trial. Review pretrial conference transcript and forward excerpt to G. Wallace re Court's expectations about meet and confer/issues for trial.
Brian Umpierre	12/30/2024	0.50	\$925.00	\$462.50	
Brian Umpierre	12/30/2024	0.30	\$925.00	\$277.50	Review edits to revised motion in limine re class member conduct and email to J. Yellin re same
Brian Umpierre	12/30/2024	0.50	\$925.00	\$462.50	Review exhibit list and proposed objections; email to J. Yellin re same.
Brian Umpierre	12/30/2024	0.30	\$925.00	\$277.50	Review G. Wallace edits to verdict form re physical or medical treatment or care Email with G. Wallace edits to verdict form re physical or medical treatment or care
Brian Umpierre	12/30/2024	0.20	\$925.00	\$185.00	
Brian Umpierre	12/31/2024	0.20	\$925.00	\$185.00	Email correspondence with co-counset re Algarme visit to facility Review Defendants' motions in limine and proposed responses
Kathryn Stebner	1/2/2025	1.80	\$1,300.00	\$2,340.00	
Kathryn Stebner	1/2/2025	1.30	\$1,300.00	\$1,690.00	Review draft motion for bench trial. Review Defendants' motions in limine; outline responses/oppositions
Brian Umpierre	1/2/2025	3.00	\$925.00	\$2,775.00	
Brian Umpierre	1/2/2025	0.40	\$925.00	\$370.00	Review motion for bench trial Emails with G. Wallace re motion for bench trial
Brian Umpierre	1/2/2025	0.20	\$925.00	\$185.00	
Brian Umpierre	1/2/2025	0.40	\$925.00	\$370.00	Review opposition to motion for Algarme's medical records Review Settlement Conference papers / party statements
Brian Umpierre	1/2/2025	1.30	\$925.00	\$1,202.50	
Brian Umpierre	1/3/2025	1.10	\$925.00	\$1,017.50	Team zoom - trial preparation and discussion of outstanding drafts of various pretrial filings Review and comment on neutral statement and pretrial statement
Brian Umpierre	1/3/2025	0.60	\$925.00	\$555.00	
Brian Umpierre	1/5/2025	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 Draft opposition to Defendants' motion in limine #2 seeking to exclude 2017 letters
Brian Umpierre	1/5/2025	2.00	\$925.00	\$1,850.00	
Brian Umpierre	1/6/2025	0.20	\$925.00	\$185.00	Email to C. Flores re trial date and availability Draft opposition to Defendants' motion in limine seeking to exclude testimony from Plaintiffs' experts Mastin and Waters
Brian Umpierre	1/6/2025	4.50	\$925.00	\$4,162.50	
Brian Umpierre	1/6/2025	1.70	\$925.00	\$1,572.50	Draft opposition to Defendants' motion in limine #2 seeking to exclude 2017 letters Team zoom re status of motions in limine/oppositions and other pretrial filings
Brian Umpierre	1/6/2025	0.70	\$925.00	\$647.50	
Brian Umpierre	1/6/2025	1.50	\$925.00	\$1,387.50	Pretrial meet and confer with defense via Zoom Review settlement deal sheets and related correspondence
Brian Umpierre	1/7/2025	0.60	\$925.00	\$555.00	
Brian Umpierre	1/7/2025	0.80	\$925.00	\$740.00	Edits to draft opposition to Defendants' motion in limine seeking to exclude testimony from Plaintiffs' experts Mastin and Waters
Brian Umpierre	1/7/2025	7.50	\$925.00	\$6,937.50	Settlement Conference (Zoom, Judge Spero)
Kathryn Stebner	1/8/2025	0.80	\$1,300.00	\$1,040.00	Meet with 8. Umplerre re 01/07 Settlement Conference Review draft pretrial statement
Kathryn Stebner	1/8/2025	0.90	\$1,300.00	\$1,170.00	
Kathryn Stebner	1/8/2025	0.40	\$1,300.00	\$520.00	Discuss draft pretrial statement with B. Umpierre Meeting with K. Stebner re 1/7 Settlement Conference
Brian Umpierre	1/8/2025	0.80	\$925.00	\$740.00	
Brian Umpierre	1/8/2025	2.00	\$925.00	\$1,850.00	Finalize oppositions to motions in limine re 2017 letters and Matin/Waters testimany and supporting declarations/exhibits; forward to co-counsel for filing Review/edits to pretrial statement, jury instructions
Brian Umpierre	1/8/2025	1.50	\$925.00	\$1,387.50	
Brian Umpierre	1/8/2025	0.40	\$925.00	\$370.00	Phone call with A. Spiegel re opposition to motion in limine seeking to exclude testimony from Plaintiffs' experts Mastin and Waters and standing order on expert rebuttal reports
Brian Umpierre	1/8/2025	0.30	\$925.00	\$277.50	Discuss draft pretrial statement with K. Stebner
Brian Umpierre	1/9/2025	0.40	\$925.00	\$370.00	Phone call with G. Wallace re Leisure deposition and use of "care" in Brookdale residency agreements Review Brookdale residency agreements and analyze use of word "care," re Leisure deposition preparation
Brian Umpierre	1/9/2025	1.10	\$925.00	\$1,017.50	
Kathryn Stebner	1/10/2025	0.70	\$1,300.00	\$910.00	Discussion with 8. Umpierre dtaft injunction edits Team zoom - pretrial filings status and other trial preparation status
Brian Umpierre	1/10/2025	0.70	\$925.00	\$647.50	
Brian Umpierre	1/10/2025	0.50	\$925.00	\$462.50	Call with J. Yellin, G. Grunfeld, G. Wallace, and M. Johnson re injunction terms Meeting with K. Stebner re draft injunction edits
Brian Umpierre	1/10/2025	0.70	\$925.00	\$647.50	
Brian Umpierre	1/13/2025	1.50	\$925.00	\$1,387.50	Prepare to argue motions in limine at tomorrow's pretrial conference Phone call with G. Wallace re pretrial conference and motions in limine
Brian Umpierre	1/13/2025	0.30	\$925.00	\$277.50	

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Brian Umpierre	1/14/2025	0.40	\$925.00	\$370.00	Emails with R. Steyer re Christopher Gail (class declarant) deposition - preparation and background
Brian Umpierre	1/15/2025	0.30	\$925.00	\$277.50	Emails with J. Yellin, R. Steyer re Christopher Gail (class declarant) deposition scheduling
Brian Umpierre	1/15/2025	1.50	\$925.00	\$1,387.50	Draft insert for Settlement Term Sheet - staffing bullet points for reporting/monitoring requirements
Brian Umpierre	1/16/2025	0.30	\$925.00	\$277.50	Emails with J. Yellin and team re deposition scheduling, including Gail (class declarant) deposition
Brian Umpierre	1/16/2025	0.60	\$925.00	\$555.00	Zoom with J. Yellin, G. Grunfeld, G. Wallace, and M. Johnson re injunction terms
Brian Umpierre	1/16/2025	4.00	\$925.00	\$3,700.00	Christopher Gail (class declarant) deposition preparation session via Zoom
Brian Umpierre	1/16/2025	2.00	\$925.00	\$1,850.00	Further Settlement Conference with Judge Spero (via Zoom)
Brian Umpierre Kathryn Stebner	1/16/2025 1/17/2025	0.10 1.20	\$925.00 \$1,300.00	\$92.50 \$1.560.00	Email to C. Flores re trial date Discussion with B. Umpierre re 1/16 Settlement Conference and proposed settlement terms
Brian Umpierre	1/17/2025	1.20	\$925.00	\$1,110.00	Discuss 1/16 Settlement Conference with K. Stebner
Kathryn Stebner	1/30/2025	0.60	\$1,300.00	\$780.00	Review edits to injunction language re staffing compliance reporting requirements
Kathryn Stebner	1/30/2025	0.30	\$1,300.00	\$390.00	Discussion with B. Umpierre re injunction language re staffing compliance reporting requirements
Brian Umpierre	1/30/2025	0.50	\$925.00	\$462.50	Review and edits to stipulated injunction; forward same to G. Wallace for review and comment
Brian Umpierre	1/30/2025	0.60	\$925.00	\$555.00	Review and edits to settlement conference statement
Brian Umpierre	1/30/2025	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. Umpierre
Brian Umpierre	1/31/2025	0.30	\$925.00	\$277.50	Review revised settlement statement to Judge Spero; email comments to G. Wallace re same
Brian Umpierre	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. Umpierre
Brian Umpierre	2/4/2025	0.40	\$925.00	\$370.00	Review further draft of settlement injunction re staffing requirements
Brian Umpierre	2/4/2025	6.50	\$925.00	\$6,012.50	Further Settlement Conference with Judge Spero (via Zoom)
Brian Umpierre	2/4/2025	0.40	\$925.00	\$370.00	Discussion with K. Stebner re 2/4 Settlement Conference
Kathryn Stebner	2/5/2025	0.60	\$1,300.00	\$780.00	Meet with B. Umpierre re proposed settlement / injunction terms
Brian Umpierre	2/5/2025	0.50	\$925.00	\$462.50	Team Zoom re injunction, settlement terms
Brian Umpierre	2/5/2025	0.60	\$925.00	\$555.00	Meeting with K. Stebner re proposed settlement terms
Brian Umpierre	2/10/2025	08.0	\$925.00	\$740.00	Review internal team correspondence and cases cited therein re notice and (b)(2) classes
Brian Umpierre Kathryn Stebner	2/12/2025 2/13/2025	0.20 1.50	\$925.00 \$1,300.00	\$185.00 \$1,950.00	Emails with J. Yellin, G. Grunfeld, G. Wallace, and M. Johnson re preliminary approval motion Review motion for bench trial and opposition
Kathryn Stebner	2/13/2025	0.40	\$1,300.00	\$520.00	Meet with B. Umpierre re motion for bench trial and opposition and strategy re same
Brian Umpierre	2/13/2025	0.50	\$925.00	\$462.50	Review motion for bench trial and opposition
Brian Umpierre	2/13/2025	0.40	\$925.00	\$370.00	Discuss motion for bench trial and opposition strategy with K. Stebner
Brian Umpierre	2/14/2025	0.40	\$925.00	\$370.00	Review team emails re settlement stiplation/injunction and attorneys fees language
Brian Umpierre	2/14/2025	0.50	\$925.00	\$462.50	Team zoom re settlement agreement
Brian Umpierre	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. Umpierre results of meeting with defense on terms of long-form settlement agreement
Brian Umpierre	2/18/2025	1.00	\$925.00	\$925.00	Zoom with defense re discussion of long form settlement agreement
Brian Umpierre	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 Umpierre	2/20/2025	0.50	\$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. Umpierre re proposed settlement terms including proposed injunctive relief
Brian Umpierre	2/21/2025	0.60	\$925.00	\$555.00	Discussion with K. Stebner re proposed settlement terms including proposed injunctive relief
Brian Umpierre	2/27/2025	0.40	\$925.00	\$370.00	Phone call with G. Wallace re class notice, final versions of settlement papers, signatures
Brian Umpierre	2/28/2025	0.10	\$925.00	\$92.50	Email to J. Yellin re participation in client meetings re settlement
Brian Umpierre	3/4/2025	0.20	\$925.00	\$185.00	Review final drafts of settlement papers
Brian Umpierre	3/5/2025	0.50	\$925.00	\$462.50	Zoom with H. Fisher (Schmidt conservaor), J. Yellin and G. Grunfeld re settlement terms, explanation, questions
Kathryn Stebner Brian Umpierre	3/6/2025 3/6/2025	0.80	\$1,300.00 \$925.00	\$1,040.00 \$740.00	Discussion with B. Umpierre re attorneys' fees and costs Discussion with K. Stebner re attorneys fees
Brian Umpierre	3/12/2025	0.70	\$925.00	\$647.50	Email to G. Wallace re summaries of settlement terms in similar understaffing litigatin re preliminary approval motion
Brian Umpierre	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 Umpierre	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. Umpierre re final approval
Brian Umpierre	4/2/2025	0.60	\$925.00	\$555.00	Meet with K. Stebner re final approval
Brian Umpierre	9/25/2025	0.50	\$925.00	\$462.50	Review Josh Allen deposition transcript re discussion of access barriers
Brian Umpierre	7/1/2025	4.50	\$925.00	\$4,162.50	Draft Stebner firm declaration in support of fee application
Brian Umpierre	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 appliation declaration with B. Umpierre
Brian Umpierre	7/10/2025	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	